



БЪЛГАРСКИ СЪВЕТ ЗА БЕЖАНЦИ И МИГРАНТИ

BULGARIAN COUNCIL ON REFUGEES AND MIGRANTS

MONITORING REPORT ON THE INTEGRATION OF BENEFICIARIES OF INTERNATIONAL PROTECTION IN THE REPUBLIC OF BULGARIA IN 2014



This Report was developed with the financial support of the United Nations High Commissioner for Refugees

Sofia
December 2014

The **Bulgarian Council on Refugees and Migrants** (BCRM) is a civil society association which operates in the area of asylum and migration in Bulgaria. It was founded in 2005 by the Bulgarian Helsinki Committee, the Bulgarian Red Cross and Caritas-Bulgaria; in 2007 it was joined by the Association for Integration of Refugees and Migrants. The Council is a platform for the activities of the member organizations related to refugee and migration policies. BCRM's mission is focused on facilitating and promoting the state policy and practice aimed at the protection of refugees' and migrants' rights, and on assisting in the development of a fair and efficient national policy in the area of asylum and migration.

Since 2009 the Bulgarian Council on Refugees and Migrants has conducted an independent audit of the implementation of the National Program for the Integration of Refugees in Bulgaria (2008-2010) and (2011-2013) under projects funded by UNHCR Representation in Bulgaria and in partnership with the State Agency for Refugees with the Council of Ministers (SAR).

In 2014 a National Program for the Integration of Refugees in Bulgaria was not approved and, hence, was not implemented. This is why, unlike the monitoring reports for previous years which assessed the implementation of the National Program, this report makes an analysis of the state of affairs in 2014 and the situation of beneficiaries of international protection in the absence of a national integration program, and puts forward recommendations regarding the measures needed to ensure the implementation of the 2014-2020 National Strategy on the Integration of Refugees in the Republic of Bulgaria approved in July 2014.

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This Report has been commissioned by the Bulgarian Council on Refugees and Migrants.

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List of abbreviations:

AMIF – Asylum, Migration and Integration Fund of the EU
APN – Alien's Personal Number
ASA – Agency for Social Assistance
BCRM – Bulgarian Council on Refugees and Migrants
BRC – Bulgarian Red Cross
BHC – Bulgarian Helsinki Committee
CBPs – Common Basic Principles for Immigrant Integration Policy in the EU
CPD – Commission for Protection against Discrimination
DCIM with MOI – Detention Centres for Irregular Migrants with the Ministry of Interior
EA – Employment Agency
EPA – Employment Promotion Act
ERF – European Refugee Fund
ESF – European Social Fund
ICC – Information-and-Consultation Centres
IC with SAR – Integration Centre with the State Agency for Refugees
IFS – Institute of Foreign Students
IPDA – Integration of People with Disabilities Act
LAR – Law on Asylum and Refugees
MES – Ministry of Education and Science
MLSP – Ministry of Labour and Social Policy
NACID – National Centre for Information and Documentation
NAMRP – National Association of Municipalities in the Republic of Bulgaria
NAPI – National Action Plan for Integration
NCC – National Chamber of Crafts
NCMI – National Council on Migration and Integration
NGO – non-governmental organization
NHIF – National Health Insurance Fund
NPIRRP – National Program for the Integration of Refugees in the Republic of Bulgaria
NRA – National Revenue Agency
OSA – one-off social aid
RESD – Regional Employment Service Directorate
RIE – Regional Inspectorate of Education
RISAA – Regulation for the Implementation of the Social Assistance Act
RRC with SAR – Registration-and-Reception Centre with the State Agency for Refugees
SACP – State Agency for Child Protection
SAR – State Agency for Refugees
TC – Transit Centre
UCN – Unique Civil Number
UNHCR – UN High Commissioner for Refugees

Executive summary

The year 2014 can be defined as a “year of zero integration”, as it was for the first time ever since 2005 – when the first National Program for the Integration of Refugees in the Republic of Bulgaria (NPIRRP) was developed – that the beneficiaries of international protection in Bulgaria had been left on their own, without being provided with specific integration measures for initial integration, including access to targeted financial aid for covering costs related to health insurance and accommodation outside the Registration-and-Reception Centres with the State Agency for Refugees (RRCs with SAR). This resulted in an extremely difficult access to basic social, labour and health rights for these individuals in 2014, while their wish to permanently settle on the territory of Bulgaria was minimized, according to the feedback from the interviews.

In a situation where the number of asylum seekers exceeded 1,000 persons per year¹ – the first such peak since the introduction of the national refugee system – and continued rising throughout 2014, the government and the competent authorities opted for an approach which, instead of being instrumental in meeting the enhanced needs, brought about ceasing the provision of integration help and support and postponing its efficient restart for an indefinite period of time. The government, instead of ensuring the expeditious and adequate drafting of the new National Program for Integration in order to support the integration of a considerable number² of individuals granted refugee and humanitarian status in 2014, chose to take a step backward and approve a National Strategy for the Integration of Beneficiaries of International Protection in the Republic of Bulgaria (2014–2020) – a framework document to serve as a basis for drafting the annual program and future integration plans. While the adoption of a strategy itself is a positive initiative, inasmuch as it facilitates long-term planning, this decision proved to be counterproductive in the specific context, and the result therefrom was an absolute – either intentional or unintentional – denial of any integration support. Thus, throughout 2014, the beneficiaries of international protection in Bulgaria were put in a situation where they had to ensure their initial and subsequent integration in the Bulgarian society by means of their own efforts, funds and capacity, and the limited assistance from non-governmental and volunteer organizations and initiatives.

As for the Strategy drafted in 2014, it sets forth ambitious goals and objectives providing for municipalities to be involved in the process of integration, as the latter had never played a specific role in the implementation of these policies. The major issue with this approach is that municipalities would be willing to

¹ Over the period 1 Jan. 2014 – 31 Oct. 2014, 8,205 persons sought protection in Bulgaria (source: SAR).

² Over the period 1 Jan. 2014 – 31 Oct. 2014, refugee status was granted to 4,073 persons, and humanitarian status to 1,766 persons (source: SAR).

take up a role only if their participation has a financial back-up; as of the period monitored, however, neither had financial estimates been made, nor did the state budget include specific measures to be financed. This situation poses the risk for the “year of zero integration” to be carried over into 2015; moreover, the government has not yet developed an Integration Plan for 2015 or, if such a draft does exist, it has not been duly submitted for approval and financing³.

In 2014 the stakeholders continued their traditional activities and measures in support of the integration of refugee and humanitarian status holders; however, as the data in the Report show, the beneficiaries of these services were few due to the lack of information and the absence of motivation for settling in the country.

I. Institutional framework for the integration of refugees in Bulgaria

- Institutional framework for the integration of refugees in Bulgarian from 2005 till December 2013

Over the period 2005-2013, the process of refugees’ integration in Bulgaria was conducted by the State Agency for Refugees on the basis of a three-year National Program for the Integration of Refugees in the Republic of Bulgaria (NPIRRP). The Program included a number of measures aimed at ensuring conditions and facilitating the integration of refugees in the Bulgarian society, as well as the actions to be taken by the relevant institutions and non-governmental organizations involved in the integration process. The Program covered an average of 100 persons per year, and in the last two years this number stood at about 60.

Under the NPIRRPs, any refugee or humanitarian status holder in Bulgaria was entitled, for a period of up to one year after receiving the status, to financial support for housing, social assistance, health insurance, Bulgarian language training, social counselling and cultural adaptation, vocational training, translation/interpretation services, and assistance in the exercise of basic rights and opportunities. The former SAR’s management shortened this period to 6 months based on their restrictive interpretation of Art. 32 (3) of the Law on Asylum and Refugees (LAR). LAR stipulates that refugee or humanitarian status holders are entitled to financial support for housing for a period of up to 6 months as from the date of coming into effect of the status-granting decision

³ As of early December 2014.

(Art. 32 (3)), which implies an obligation for the state to ensure such support for at least 6 months.

The institution directly in charge of the execution of the Program was the Integration Centre with SAR (IC). The IC determined the eligibility criteria, designed the package of integration measures, including the ones for refugees with special needs, the norms for their delivery, and ensured the arrangements for applying the package of integration measures. Non-governmental and other organizations acted as partners in the implementation of the measures for the integration of newly recognized refugees. According to the *Internal Regulation on the Application of the Measures for the Integration of Newly Recognized Refugees set out in the National Program for the Integration of Refugees in the Republic of Bulgaria (2011-2013)*⁴, humanitarian or refugee status holders who wished to apply were entitled to file an application for enrollment in the Program *within 2 months* after being served the status-granting decision under the Law on Asylum and Refugees (LAR). A social interview was conducted with the applicants; an individual integration plan was drafted; and, given the approval by the Integration Committee⁵, a contract for participation in the Program was signed between the participant and SAR's Chairperson.

The participants in the National Program were provided with the following integration measures and social aid:

- 600 classes of Bulgarian language training, which ended with a final examination;
- 198 classes of vocational training in the areas of hairdressing, cosmetics, tailoring and computer skills, which ended with a final examination;
- Consultations and support in relation to enrolment in vocational training and employment programs;
- Activities under the NPIRRB in relation to the integration of aliens granted a status under LAR;
- Translation/Interpretation services in relation to the exercise of basic rights and opportunities, and other integration-related activities;
- One-off social aid (OSA)⁶ paid out in the fourth month after enrolment in the Program;
- Targeted assistance for the issuance of an identity card up to the amount of the issuing costs, not exceeding the minimum guaranteed income;

⁴ Amended by an Order of SAR's Chairperson No 03-350/25.06.2013.

⁵ The Integration Committee was chaired by SAR's Deputy Chairperson, and consisted of representatives of the IC, the Administrative, Legal, Information Services and Financial Activities and Logistics Directorate, SAR's specialized administration, and representative of the partner non-governmental organizations. Its powers included: approval of the annual plan for the implementation of NPIRRB, updating, if needed, the eligibility criteria and the package of integration measures, examination of the application for participation in NPIRRB within a term of up to 2 months, integration plans, drafts of contracts, etc.

⁶ Under the terms and procedure and in the amount laid down in the Regulation for the Implementation of the Social Assistance Act.

- A stipend for the period of the Bulgarian language training, social orientation and cultural adaptation, and vocational training⁷;
- Monthly financial support for rental expenses of the individuals enrolled in the Program;
- Monthly social insurance for the participants⁸;
- Weekly transport cards or tickets for the public transport over the duration of the Bulgarian language training, social orientation and cultural adaptation, and vocational training, including for the children attending courses at the IC⁹;
- Payment of kindergarten fees for 10 children / year: 60 BGN / child.

A Regulation on the Implementation of the Social Protection Measures for Asylum-seekers or Status holders with Special Needs was adopted in 2011. This Regulation lays down the terms and conditions for the assistance provided to this group of aliens, the measures for their social protection and integration in the Bulgarian society. The Regulation defines as vulnerable groups: unaccompanied minors, pregnant women, persons aged over 65, single parents accompanied by their minor or underage children, families with three and more children, mothers with children aged up to three, persons with disabilities, victims of serious forms of mental, physical or sexual violence, persons with chronic diseases.

A National Strategy on Migration, Asylum and Integration (2011–2020 ã.) was endorsed in 2011, which includes amongst the target groups asylum seekers, refugee and humanitarian status holders. SAR is one of the institutions involved in the implementation of the Strategy on the basis of annual action plans¹⁰.

- Institutional framework for the integration of refugees in Bulgaria in January 2014

After the completion of the NPIRRB in late December 2013, a new Program for the next programming period (2014–2016) was to be drafted, the deadline for that purpose being March 2014¹¹. In late 2013 an interagency working group was set up by an order of the Prime Minister; its members were representatives of SAR, all the stakeholder ministries and agencies, UNHCR, the National Association of Municipalities in the Republic of Bulgaria (NAMRP) and NGOs. The working

⁷ The amount of the stipend was determined in conformity with the Action Plan to the Employment Promotion Act (EPA) at BGN 8/day. In reality, however, the participants received BGN 4/day of class attendance.

⁸ The health insurance contribution is determined in conformity with the NHIF Budget Act on the basis of 50 % of the minimum insurance income for self-employed persons.

⁹ The cards/tickets were provided only for working days on which classes were held; children were not provided with cards/tickets.

¹⁰ National Strategy on Migration, Asylum and Integration (2011–2020).

¹¹ According to the 2014 Goals of the State Agency for Refugees with the Council of Ministers – http://www.aref.government.bg/docs/CHELI_DAB_2014.doc

group drafted the new Program which was submitted to the Council of Ministers (COM); however, the draft was not put to the vote within the above time limit.

An operational meeting of COM took a decision about changing the approach to the refugee integration policies, and the competence for the management of the NPIRRB was transferred from SAR to the Ministry of Labor and Social Policy (MLSP). MLSP indicated as a precondition for a new National Program for Integration the drafting and adoption of a National Strategy on Integration, which resulted in additional delays in the adoption of the new NPIRRB¹².

On 2 Febr. 2014 a National Strategy on the Integration of Beneficiaries of International Protection in the Republic of Bulgaria (2014–2020) was adopted. The drafting of the Strategy was not preceded by a publicly available assessment of either the NPIRRBs implemented till the end of 2013 and the outcomes therefrom or of the arguments for introducing the new approach quoted as an example of successful integration in the region. The only observation in the Strategy is that the previous NPIRRBs were operational in a situation with a small number of asylum seekers or refugee/humanitarian status holders, thus covering an average of 60 beneficiaries per year, which is indicative of the scope of these Programs but not of their efficiency; the emerging situation, however, requires a different approach. According to the state experts interviewed, the need to apply a new approach stemmed from: the changes in the refugee situation and the need for the integration issue to be addressed “at a higher level of political responsibility”; the shortened time limit for the status determination procedure of 1 up to 3 months and the need to provide for initial adaptation during this period; and the development of a Strategy defining the obligations of all stakeholders.

In addition to the successful integration in the Bulgarian society of refugee or humanitarian status holders, the National Strategy pursues a more efficient use of the potential of these individuals to the benefit of the country’s social and economic development. The Strategy sets out integration measures and identifies the stakeholder institutions which will jointly contribute to the delivery of these measures by means of annual National Action Plans for Integration across the territory of the country.

A new element in the integration policy with respect to refugees in Bulgaria is the modified coordination mechanism. The new Strategy determines MLSP as the authority in charge of the overall coordination of the implementation of the Strategy via the National Council on Migration and Integration¹³. The

¹² Legal Protection of Refugees and Migrants Program (2014): Annual Report on the Monitoring of the Status Determination Procedure in Bulgaria, p. 13 –

http://www.bghelsinki.org/media/uploads/documents/reports/special/2014-bhc-annual-rsd-monitoring-report_bg.pdf

¹³ The amendments to MLSP’s Rules of Procedure regulating the Ministry’s new role in terms of refugees’ integration have not yet been adopted.

amendments to SAR's Rules of Procedure limit the Agency's integration role to measures for the applicants' adaptation only during the status determination procedure, consisting of initial Bulgarian language training for applicants who are accommodated at a Registration-and-Reception Centre of SAR¹⁴.

The Strategy provides for a key role to be played by municipalities which are the authorities responsible for the delivery of integration policies at the local level, such an approach being in line with one of the Common Basic Principles for Immigrant Integration Policies in the EU: *"Integration policies and measures shall be part of all the relevant governance policies and levels."*¹⁵

The municipalities that are willing to receive on their territory a certain number of beneficiaries of international protection – depending on the state of the labor market, the persons' qualifications, the demographic trends, the development prospects for the municipality, etc. – join in the implementation of the National Action Plan for Integration (NAPI).

The new Strategy defines the integration agreement as the basic integration tool: the agreement is signed on an individual basis for a 1-year term with each adult member of the family who has been granted protection and an empowered representative of the municipality. In conformity with the NPIRRB model, a 1-

¹⁴ Adopted by a Decree of COM No 59 of 21 March 2008, amended SG issue 36 of 25 April 2014.

¹⁵ On 19 November 2004 the Justice and Home Affairs Council adopted 11 Common Basic Principles for Immigrant Integration Policies in the European Union (Common Basic Principles on Integration – CBPs). The purpose of these non-binding basic principles is to assist member states in determining and assessing their integration policies. The eleven basic principles are: 1. Integration is a dynamic, two-way process of mutual accommodation by all immigrants and residents of Member States; 2. Integration implies respect for the basic values of the European Union; 3. Employment is a key part of the integration process and is central to the participation of immigrants, to the contributions immigrants make to the host society, and to making such contributions visible; 4. Basic knowledge of the host society's language, history, and institutions is indispensable to integration; enabling immigrants to acquire this basic knowledge is essential to successful integration; 5. Efforts in education are critical to preparing immigrants, and particularly their descendants, to be more successful and more active participants in society; 6. Access for immigrants to institutions, as well as to public and private goods and services, on a basis equal to national citizens and in a non-discriminatory way is a critical foundation for better integration; 7. Frequent interaction between immigrants and Member State citizens is a fundamental mechanism for integration. Shared forums, intercultural dialogue, education about immigrants and immigrant cultures, and stimulating living conditions in urban environments enhance the interactions between immigrants and Member State citizens; 8. The practice of diverse cultures and religions is guaranteed under the Charter of Fundamental Rights and must be safeguarded, unless practices conflict with other inviolable European rights or with national law; 9. The participation of immigrants in the democratic process and in the formulation of integration policies and measures, especially at the local level, supports their integration; 10. Mainstreaming integration policies and measures in all relevant policy portfolios and levels of government and public services is an important consideration in public policy formation and implementation; 11. Developing clear goals, indicators and evaluation mechanisms are necessary to adjust policy, evaluate progress on integration and to make the exchange of information more effective.

year individual integration plan is drawn up after an individual social needs assessment; the plan identifies the integration steps, the package of integration measures and the expected outcomes.

The package of integration measures follows the NPIRRB model:

- Involvement in a 6-month Bulgarian language course – 600 classes for reaching A2 or A1 level under the Common European Framework of Reference for Languages, depending on the trainee's educational background;
- Social orientation classes aimed at acquiring knowledge about Bulgaria's social system political structure, cultural traditions and customs, etc., conducted within framework of the Bulgarian language training;
- Monthly rental support for the period of the integration agreement with the beneficiaries of international protection;
- Upon successful completion of the Bulgarian language course, referral to vocational training and retraining;
- Ensuring access to education for children;
- Right to health insurance and access to social services provided by the EODs for the period of participation in the NAPI, etc.

Measures have been identified to meet the needs of the growing number of unaccompanied children seeking international protection. Professional support and specialized intercultural trainings are offered to the staff working with these children.

II. Methodology

The Monitoring Report is based on a multi-disciplinary approach and applies qualitative sociological methods and analyses of policies and the legal framework.

Stratification of the sample

The objective of the monitoring survey is to encompass as many categories from the target group as possible on the basis of the maximum variety model, as follows:

Origin -> Syria, stateless persons, Iran, Iraq, Ethiopia, Lebanon;

Reception Centre -> the in RRC Sofia (covers the beneficiaries accommodated at SAR's facilities in Sofia: the neighbourhoods of Ovcha kupel, Voenna rampa, Vrajdebna, and in the village of Kovachevtzi¹⁶), the RRC in the town of Harmanli,

¹⁶ The Centre ceased to operate in late October 2014.

TC in the village of Pastrogor, the RRC in the village of Banya (Nova Zagora municipality), and the beneficiaries with accommodation outside SAR's facilities;

Status -> refugee and humanitarian status

Gender-> men, women

Age -> underage (minor), adult (18–54), elderly (over);

Family status -> single, family with children, family without children, single parent with children, others

Vulnerable groups-> people with disabilities, unaccompanied minors, pregnant women, elderly people.

174 interviews have been conducted with refugee or humanitarian status holders. 90 of these are adult men, 66 adult women, and 18 minors. The adult interviewees come from the following countries of origin (citizenship):

Syria	146
Stateless	3
Iran	3
Ethiopia	1
Afghanistan	1
Iraq	1
Lebanon	1

The reason for the imbalance related to the Syrian nationals reflects the ratios within the whole group of refugee and humanitarian status holders involved in the NPIRRB. In 2015 the highest number of applications for international protection were lodged by Syrian citizens, followed by citizens of Afghanistan and Iraq.

1	Syria	4,800 (58 % of the total No)
2	Afghanistan	2,000 (24 %)
3	Iraq	353 (4.3 %)
4	Stateless	240 (2.9 %)
5	Algeria	150 (2.4 %)

Top 5 countries of origin in terms of the number of applications lodged over the period 1 Jan. 2014 – 31 Oct. 2014, Data: SAR, November 2014¹⁷

18 interviews have been conducted with experts from the IC of SAR, MLSP, other state agencies and NGOs in Sofia and other cities involved in the integration process.

¹⁷ Official website of SAR: <http://www.aref.government.bg/?cat=8>

Methodology of the sample

The team of the survey reached the respondents both by organizing its own interviews and by taking part in the annual Age, Gender and Diversity Participatory Assessment (AGD) conducted by UNHCR in 2014¹⁸.

Method of registration and on-site tools

The semi-structured problem-oriented interview was the main method used for information gathering. A standard questionnaire developed for the purpose of the AGD interviews of UNHCR was used for interviewing refugee and humanitarian status holders. An additional specialized questionnaire was designed for experts from SAR, MLSP, and others from the state administration and NGOs (stakeholder ministries, state and executive agencies, local authorities, independent bodies, non-governmental organizations, refugee organizations). **The method of direct observation** was applied and **informal interviews** were held by means of the team's participation in working meetings with the state administration and NGOs.

In addition to the interviews, reports of UNHCR, BHC, and other information provided by experts from state institutions interviewed for the purpose of the Monitoring Report were used as additional sources of information.

III. Findings from the monitoring

1. „Year of zero integration”

According to the official statistical data of SAR for 1 Jan. 2014 – 31 Oct. 2014, 8,205 persons sought international protection in Bulgaria compared to 7,144 for the whole year 2013, which shows a trend of gradual rise in the number of asylum seekers (12 % against the whole year 2013).

Humanitarian status has been granted to 4,073 persons, and humanitarian status to 1,766 persons. Refugee status has been refused to 407 persons¹⁹.

In spite of the growing refugee inflow since late 2013 and the adoption of the National Strategy for the Integration of Beneficiaries of International Protection

¹⁸ UNHCR conducts an annual survey by age, gender and belonging to a particular social group (Age, Gender and Diversity Participatory Assessment) within which governmental and non-governmental institutions organize focus groups with refugees and asylum seekers accommodated both at SAR's accommodation facilities and outside them.

¹⁹ Official statistical data of SAR for the period 1 Jan. 2014 – 31 Oct. 2014 published on SAR's website: <http://www.aref.government.bg/?cat=8>

in the Republic of Bulgaria (2014–2020), **in 2014 the state did not approve a National Action Plan for the Integration of Refugees and did not implement targeted measures for the initial integration of beneficiaries of international protection in Bulgaria.** As of the time of drafting the Monitoring Report²⁰ there were ongoing discussions on the 2014 National Action Plan for Integration and the Annual Financial Estimates for the application of the measures laid down in the Strategy. A National Plan for 2015 had not been drawn up and discussed.

In addition to the complicated political situation in the country and the three consecutive governments in one year, the failure to put in place integration programs and measures in 2014 can be attributed mostly to the lack of political will for broadening the scope and ensuring nationwide implementation of the integration programs effective till 2013. The substantial delay in starting up discussions on the new programming period; the shift to a new Strategy without prior public consultations and discussions on the need to change the approach; and justifying the suspension integration policies with the lack of public funds for the implementation of such policies resulted in a year of “zero integration”. This happened in a situation where Bulgaria was facing a manifold increase in refugee inflows, in the numbers of status-granting decisions and persons in need of integration support.

2. Analysis and evaluation of the measures planned by priority areas

As the National Action Plan for 2014 had not been adopted by early December 2014, the experts interviewed shared that the next step would most probably be the development of a new Plan for 2015.

The Strategy approved in 2014 and the draft of the National action Plan²¹ are structured in eight priorities and two specific areas of measures which will be analyzed in this Monitoring Report with a view to facilitating the development of the new Action Plan in 2015.

2.1. Analysis of the proposed “General coordination measures”
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Measures planned

²⁰ As of early December 2014.

²¹ As of the time of drafting the Report, the National Action Plan had not been approved. Hence, the version from early November 2014 was used for the purpose of the Report.

The draft version of the National Action Plan contains three measures in relation to the setting up of the National Council on Migration and Integration.

Measure 1. Transforming the National Council on Labor Migration with the Minister of Labor and Social Policy into a National Council on Migration and Integration (NCMI). Defining NCMI's functions in the area of third-country nationals' integration, and the institutions and organizations represented in the Council.

Measure 2. Issuing an order on the composition of NCMI, and convening the first meeting which will:

2.1 adopt the Regulation on the Organization and Activity of the Council;

2.2 set up a Committee on Integration and will discuss its mode of operation. The Committee on Integration will design standard forms and agreements.

Measure 3. Ensuring the effectively start-up of the process of referring beneficiaries of international protection to the relevant municipalities for signing a bilateral Integration Agreement.

Issues identified

The adoption of the Strategy was followed by a Decree of the Council of Ministers on setting up and defining the functions of the National Council on Migration and Integration (NCMI) in the area of third-country nationals' integration, and the institutions and organizations represented in the Council, and a Regulation on NCMI's Organization and Activity, which had not been adopted by early December 2014. The members of the future National Council on Migration and Integration had been designated, but the initial meeting for the constitution of the Council had failed due to the change in government. This development is upcoming in the context of implementing the new Plan for 2015. According to an MLSP expert interviewed, each lead institution will contribute to the coordination of the measures for refugees' integration by ensuring the delivery of the measures in its line area.

As a result of the adoption of the Strategy, SAR ceased the delivery of Bulgarian language and vocational training course on the following two grounds: the Agency not being the responsible authority for integration and the lack of funds for integration. The amendments to SAR's Rules of Procedure adopted in

September 2014²² transformed the IC into an Adaptation Department within the newly established Social Activity and Adaptation Directorate whose only task is to facilitate the initial integration of asylum seekers. According to SAR's experts interviewed, as a result of the institutional changes in 2014 and the lack of an effective NPIRRB, no distinction is made in practice between newly recognized refugee and humanitarian status holders, on the one hand, and asylum seekers, on the other hand; hence, the departments of the above Directorate provide services to both categories. The activities carried out by the Directorate in 2014 related to facilitating the Bulgarian language courses conducted by Caritas-Bulgaria with the financial support of UNHCR; logistical support for the vocational training courses financed also by UNHCR; collecting and submitting information about persons who seek or have been granted protection to the other stakeholders; developing documents and registers pertaining to SAR's new role in the integration process; and counselling and support services for persons who seek or have been granted protection in relation to the access to the education system, labor market, etc.

In spite of the lack of an Integration Program in 2014, the other institutions whose competences are relevant to the policies for refugees' integration continued their regular activities and measures with a general focus on facilitating the integration process²³.

Recommendations and best practices

- *Implementing a coordination mechanism*

The setting up of such a coordination structure including amongst its members the deputy ministers of the stakeholder ministries and the executive directors of the stakeholder agencies is in line with the best integration practices in the EU²⁴. The Strategy envisages the functioning of a Secretariat with the Council. In addition to the Strategy and the Plan, a coordination mechanism for the implementation of the integration policy is needed, as the new approach provides for the involvement of many structures at the national, regional and local level. The coordination mechanism should regulate in details the activities

²² Approved by a Decree of COM No 59 of 21 March 2008, amended SG issue 78 of 19 Sept. 2014.

²³ See p. 11 of the Strategy for information regarding the stakeholder institutions implementing general measures in support of integration:

<http://www.mlsp.government.bg/bg/docs/Refugees%20Integration%20Strategy-FINAL-July2014.pdf>

²⁴ See for example: High Commission for Integration and Intercultural Dialogue (ACIDI) in Portugal:

<http://www.acidi.gov.pt/cfn/4d346c9b80687/live/Consulte+a+versão+da+Plano+2010-2013+em+Inglês>

of each institution, the procedures, the time limits, the responsible employees, etc.

- *Changing the form and structure of the National Action Plan*

The measures set out in the current draft Action Plan are not specific enough: many of them have a broad scope with several activities; some activities overlap; and there is no clear allocation of responsibilities among institutions and individuals – at the national level (the central administration) and at the local level. Furthermore, there are inconsistencies between the measures in the Strategy and the ones in the Plan.

Another issue concerns a gap in the Plan: the structure lacks an area with a detailed presentation of the measures included in the initial integration package to be provided by municipalities. NPIRRB contained such a package of well-defined measures which has to be implemented by municipalities on the basis of an individual integration plan. This package of measure should also include transportation to the municipality to which the beneficiary has been referred.

- *Involvement of additional key state institutions*

The draft Plan does not envisage the involvement of the Commission for Protection against Discrimination (CPD)²⁵ which can be instrumental in the implementation of the measures for providing refugee and humanitarian status holders with information about their rights in the area of protection against discrimination. The interviews held with representatives of CPD indicate that the Commission took part in the working group for the development of the National Action Plan and submitted a letter to SAR proposing its involvement in some measures; however, CPD's proposal has not been reflected in the second draft. CPD's members are willing to take part in the National Council on Migration and Integration with MLSP and in the implementation of measures in all priority areas via their regional representatives deployed in 17 regional cities. The staff interviewed confirmed their strong commitment to the issues at stake, and referred to the actions taken by CPD in relation to the incident in the village of Kalishte in September 2014 – the Commission acted ex officio and initiated proceedings for potential inadmissible discrimination. However, only two complaints concerning discrimination against refugees had been lodged since the beginning of the year and proceeding had been initiated in relation to them, which is indicative of the need to raise awareness regarding the entitlements under the Protection against Discrimination Act.

²⁵ It is included only in the composition of the NCMI.

Another key state institution which has not been included in the draft Plan is the national Ombudsman of the Republic of Bulgaria who can also contribute to the efficient delivery of the measures planned. Other important contributors who should be involved are the local Ombudsmen, and NGOs working with refugee communities or representing their interests.

- *Planning activities for the practical application of the indicators for assessing the efficiency of the integration process*

The Strategy contains indicators for evaluating the efficiency of the integration process by priority areas; these indicators have been designed on the basis of UNHCR's tool for integration evaluation: access to education, vocational training and qualification, access to employment, life-long learning, access to housing, access to healthcare, access to social assistance. This approach is in line with CBP 11: *"Developing clear goals, indicators and evaluation mechanisms are necessary to adjust policy, evaluate progress on integration and to make the exchange of information more effective."*

The information gathered under the indicators will be summarized by the relevant competent authorities, which requires defining both the responsibilities and the data to be collected by each institution during the year. As the Plan provides for the Secretariat with the National Council on Migration and Integration to develop methodological guidance for summarizing and analyzing the information, the Council and the responsible staff from the relevant ministries should be trained in the application of the indicators; such training can be jointly organized with UNHCR.

2.2 Analysis of the measures in Priority Area 1 "Provision of Information"

Measures planned

The draft National Action Plan lays down 6 measures aimed at providing information to both the beneficiaries of international protection and the local community.

Measure 1: Gathering and providing information about: the social and professional profile of the beneficiaries of international protection; their rights and obligations in a language they understand by means of brochures with information about health insurance, choosing a family doctor (a general practitioner, GP), terms and procedure for registering with the employment offices, eligibility conditions for

social assistance, procedures for enrollment in Bulgarian educational establishments and vocational training courses, the social services provided to vulnerable groups on the territory of the municipality and the terms and procedure for using them;

Measure 2: Publishing information about the rights and obligations of beneficiaries of international protection on the stakeholders' websites (description of the necessary steps in the relevant procedures; standard forms of applications and declarations);

Measure 3: Setting up Information-and-Consultation Centres (ICC) which will operate as local administrative services run by municipalities. Developing a register of volunteers and professional translators/interpreters, medical doctors, and other specialists who will collaborate with ICCs;

Measure 4: Organizing information meetings for representatives of the central and local authorities, NGOs and "opinion leaders" amongst the beneficiaries of international protection in order to discuss cooperation arrangements and the support provided in various social areas;

Measure 5: Informing the civil society about the integration of beneficiaries of international protections by releasing current information in the mass media – electronic and printed;

Measure 6: Conducting targeted communication campaigns in the municipalities designated for the integration of beneficiaries of international protection with a view to raising awareness on issues such as accepting foreign cultures, preventing aggression, distrust and prejudice.

Issues identified

Almost all the refugee and humanitarian status holders interviewed share that they are not aware of their rights and obligations and do not receive sufficient and accessible information in a language they understand. The respondents are mostly informed by means of short leaflets which they receive with the status-granting decision; leaflets only list their legal rights, which is far from being sufficient. They are not provided with oral explanations about these rights in a language understandable to them. A case of an illegible low-quality copy of the leaflet has been registered. Neither are the respondents provided with clarifications regarding the procedures and the authorities they can approach in order to exercise their rights or receive support. The situation is even more difficult for those who have accommodation outside SAR's facilities. These respondents share that their information channels are mostly friends and

compatriots who often charge fees in the amount of 30 up to 50 BGN for “the service”, volunteers at the RRCs, social workers, lawyers, and even Bulgarian language teachers who, being often insufficiently informed about the procedures, are a source of erroneous or incomplete information.

The lack of sufficient information is an issue occurring often at the point of lodging the asylum application which causes frustration and a sense of having no prospects or being doomed. According to the respondents, they are not informed about the rules and the restrictions imposed by EU member states in terms of free movement; neither are they aware of the steps to be taken after leaving SAR’s centres where they are accommodated.

On the other hand, the lack of information about refugees amongst the local community may cause an attitude of discrimination. Most of the interviewees do not report any problems with the local communities. Some of them tell stories about a positive attitude, about people helping them with donations: “*The Bulgarian people are very poor but compassionate.*” Many of the respondents have friends amongst the Bulgarians. Nonetheless, each annual monitoring registers several cases where women share having felt threatened for wearing the hijab²⁶.

Recommendations and best practices

The measures planned are in line with CBP 1: “*Integration is a dynamic, two-way process of mutual accommodation by all immigrants and residents of Member States.*”

- *Putting in place a common data base with integration profiles*

The interviews reveal that actions have already been taken on the first part of Measure 1. SAR and the Employment Agency (EA) develop electronic individual integration profiles which are the up-dated version of the integration plan introduced by the NPIRRB. SAR’s profile consists of personal data, family status, children attending school, material state, educational and professional background. Where documents certifying education/qualifications are available, the holders of such documents are assisted in ensuring translation and legalization. According to SAR’s experts, the information gathered will be made available to the municipality chosen by the beneficiary for integration after receiving the status. EA’s profile has a focus on education and professional qualifications and is submitted to the Employment Offices. In view of avoiding

²⁶ The reports are available on the website of the Bulgarian Council on Refugees and Migrants: <http://www.bcrm-bg.org>

duplication of efforts and improving inter-agency coordination, the information gathered should be part of a common data base which will be accessible to all stakeholder institutions involved in the application of integration measures.

- *Ensuring options for additional clarifications and subsequent provision of information to beneficiaries of international protection*

The issues identified in terms of the lack of sufficient information accessible in a language that beneficiaries understand is inherent to the NPIRRB. This stems from the fact that the development and dissemination of an information brochure in itself cannot substitute the provision of clarifications in a language that beneficiaries understand. Moreover, the serving of the status-granting decision and the accompanying brochure with initial information seems to be the first and last step, the beneficiaries being left without any practical options for clarifications regarding the guidance in the brochure. Therefore, while the first two measures are important, they will not be effective and efficient unless they are backed up with oral clarifications and consultations by the competent authorities.

Additional clarifications and follow-up information can be ensured within the framework of Measure 3: “Information-and-Consultation Centres (ICC)”. These Centres could employ refugees who speak the language of the main countries of origin from which asylum seekers in Bulgaria come. Such practice has been put in place, for instance, in Austria and Portugal. On the one hand, the Centres operating as “one-stop shops” help to address the deficit in providing information to newly recognized refugees, and, on the other hand, create jobs for status holders by making use of their specific skills. The staff of these centres are employees from the various stakeholder ministries – labour and social policy, education and science, health, interior, etc. – who render on-site administrative services. Amongst the services offered are training courses in the language of the receiving country, career counselling, legal aid, etc.

The staff and the collaborators of the Centres need specialized training in the specifics of working with the target group. As the National Plan does not set out specific arrangements for the structure and the financing of the Centres, the recommendations made by the High Commission for Migration and Intercultural Dialogue of the Republic of Portugal should be taken into consideration.

Best practices in area “Provision of information”

Portugal

An example of best practice in terms of the initial package of integration measures and successful inter-agency coordination is set by the High Commission for Migration and Intercultural Dialogue (ACIDI). The Commission has developed a handbook with seven underlying principles for the design and setting up of the centres on the basis of the one-stop shop approach in the provision of integration measures²⁷.

Germany

The services for the provision of consultation services to migrants (Migrationberatung) coordinated by the Federal Service for Migration and Refugees has an annual budget of approx. 26 mill. Euro. The service is instrumental in supporting many centres run by NGOs (e.g. the German Red Cross and Arbeiterwohlfahrt) across Germany, which offer counselling and assistance for drawing up individual “development plans”. The beneficiaries are consulted on a variety of matters, including accommodation, employment and education, the immigrants being required to fully participate and cooperate in the delivery of the development plan.

Initiatives of the city of Nurnberg aimed at coordinating the integration efforts: in 2012 the mayor of Nurnberg established a Committee on Integration consisting of representatives of all political parties, members of the Foreigners’ Advisory Council and the Repatriates’ Advisory Council. The Committee monitors any issues concerning the migrant population of Nurnberg. A coordination group ensures that the integration topic is on the agenda of all administrative departments, while a supervisory committee manages the Integration Program of the city of Nurnberg. The Integration Program is the outcome of a large-scale public debate with the stakeholders directly involved in integration, and provides integration guidelines, a review of the Nurnberg’s integration policies over recent decades, a definition of the target groups, analyses of the political framework, and a description of the state of affairs. It also contains an assessment of the statistical data, the latest ones being for 2013.

You can find more information about the numerous integration projects in Nurnberg covering a broad range of social, educational and children projects at: <http://goo.gl/wdFZ7o>.

The information in the brochures can also be edited in the form of handbooks with the basic information needed for refugees’ initial integration in a language understandable to their users. Such a tool would also be helpful to the staff of the central administration, the local authorities, and the ICC. In addition, video materials in various languages may be produced.

²⁷ The Handbook is available at: http://www.acidi.gov.pt/institucional_book.pdf. For more information about this best practice: http://ec.europa.eu/ewsi/en/practice/details.cfm?ID_ITEMS=26423

- *Raising the awareness of the receiving community*

In view of the situation with the growing number of xenophobia cases in late 2013 as a result of the increased refugee inflow, actions need to be taken to raise the awareness of the receiving community at the local level. In addition to the numerous international practices in this respect, a number of campaigns and projects have been implemented over recent years in Bulgaria. These initiatives should be subject to an impact assessment, and, depending on the results, replicated in the future. Similar projects have been financed by the European Integration Fund, a Program for the Support of NGOs in Bulgaria under the Financial Mechanism of the European Economic Area, etc. The reason for the lack of positive results in this respect is both the absence of long-term targeted measures and the weak inter-agency coordination. Awareness-raising efforts should not be based only on ad hoc campaigns organized under NGO projects or initiatives but rather on a holistic approach. Such an approach should be implemented at the lowest level, starting with kindergartens and schools, and should be integrated in the school curricula in order to promote tolerance and the acceptance of cultural differences at an early age. What is further needed is specialized and regular interaction with journalists whose knowledge of refugee-related matter is still rather limited. This process should also encompass institutions such as the national Ombudsman and CPD. Last but not least, representatives of the refugee communities and their organizations have to be actively involved in the awareness and sensibility raising campaigns on matters regarding refugees' reception and integration in Bulgaria. The participation of representatives of foreigners' communities in the decision-making process for policies concerning their interests is in line with CBP 9²⁸. In this respect Measure 4 is of particular relevance, in spite of its difficult implementation, as the NGOs of refugee communities in Bulgaria are still few and at an early stage of organizational development. Achieving a situation with "opinion leaders" amongst refugees requires close cooperation with Bulgarian NGOs and volunteers providing support to refugees whose everyday activity implies ongoing cooperation with refugee communities (their operations in the field).

Best practices in area "Awareness Raising among the Receiving Community"²⁹

Austria

²⁸ „The participation of immigrants in the democratic process and in the formulation of integration policies and measures, especially at the local level, supports their integration.”

²⁹ Identified by UNHCR within the framework of the project “Refugees’ Integration: Capacity and Evaluation”.

Together: Austria (Zusammen: Österreich) financed by the Austrian Integration Fund promotes a process whereby migrants who have been successfully integrated in Austria share experience by telling their success story in schools. The project is aimed at reducing prejudice and informing about positive models and success motivation.

Canada

The *Host Program* provides financing for the recruitment, training, setting up of pairs, and guiding volunteers (individuals and groups such as churches, groups from the community and families) in order to assist newcomers in their adaptation, settlement and integration in Canadian life. When the Host Program started in 1984, it had a focus on refugees. In 1990 its scope was broadened to cover all newly arriving immigrants. According to the program evaluation, it has helped its beneficiaries to better understand the Canadian society; lower their stress levels as a result of the transformation; boost their self-confidence and raise their awareness of services and resources that might facilitate their independence. For more information: <http://goo.gl/HnbgAR>.

Welcoming Communities Initiative: The focus of this initiative is on creating relations between newly arriving immigrants and Canadian nationals in view of overcoming the barriers to integration by promoting hospitable local communities and educating on racism-related topics. In addition, the project supports awareness-raising activities, field work, the development of methods, resources and direct services targeting newly arriving immigrants, young people and communities. For more information: <http://goo.gl/wk6HJV>.

Later on these programs were replaced by the *Community Connections* component which is part of the Settlement Program.

France

Association for Republican Financing of Persons Seeking Asylum and Protection (Association de Parrainage Républicain des Demandeurs d'Asile et de Protection, APARDAP) in Grenoble: asylum seekers can be accommodated in a close circle with French families, which facilitates the process of settling in France and provides support during the status determination procedure. The support received is both administrative and in a purely human aspect. The Association pursues promoting closer interaction between asylum seekers/refugees and French nationals. The *Centre for the Reception of Asylum Seekers* (Centre d'accueil de demandeurs d'asile, CADA) run by ADOMA in Gargenville organized focus groups with the participation of asylum seeking and refugee women and women living in the same neighbourhood. This is a way to enable the two groups of women to get to know each other.

Germany

Cultural “Neighbourhood Shops” in Nurnberg: The initiative started up in 1975 as a social experiment; the “cultural shops” concept is about a platform for socialization and discussion forums for persons of all ages, nationalities and social status. It is mainly children, young and elderly people, women and foreigners that make use of the small shops. Being evaluated as positive, the project had a follow-up in 1977, and at present the 11 small shops financed by the city of Nurnberg are an important player in the urban cultural life. For more information: <http://goo.gl/l8Vdta>.

For over 20 years the federal *Integration via Sport* program has received financial support from the Federal Ministry of Foreign Affairs and has been coordinated by the German Olympic Sports Confederation (DOSB). For more information: goo.gl/bScxNL.

Ireland

An initiative aimed at promoting migrants’ political representation and involvement is the *Opening Power to Diversity* program. The program helps migrant volunteers establish contacts with members of the government in order for the migrants to get an idea about Ireland’s political system and the way it functions. For more information: livinginireland.ie/en/opening_power.

Within the framework of the *Migration Nation* and via the *National Action Plan against Racism*, Irish sports associations take actions at various levels by implementing plans for promoting integration via sport. While the programs do not specifically target refugees, the associations and clubs actively encourage refugees’ involvement at the regional level by means of national inclusion and integration strategies. For example, the Football Association of Ireland (FAI) and the Gaelic Athletic Association (GAA) have drawn up inclusion and integration strategies. For more information: gaa.ie/clubxone/inclusion-and-integration.

Sweden

New Friendships in Haparanda: In Haparanda, a town in northern Sweden, a local initiative has contributed to improved social integration. The activities include excursions, sport, lectures, discussions in female and male groups of refugees and Swedish nationals. The participants discuss cultural topics, differences in ethnic backgrounds, and common experience. A Swedish volunteer declared that the project had proved beneficial in bringing people together and making new friends. The *Integration Project* was initiated by local volunteers, the Swedish Red Cross, Save the Children and the UN Association.

The United Kingdom

The examples of projects for direct support include the *City of Sanctuary* initiative whose purpose is building a culture of hospitality. The initiative is represented across the UK. For more information: cityofsanctuary.org.

2.3. Analysis of the measures in Priority Area 2 “Education and Bulgarian Language Training”

2.3.1. Bulgarian language training, social orientation and cultural adaptation, and vocational training

Priority area 2 of the draft National Action Plan for 2014 envisages the following measures related to Bulgarian language training, social orientation and cultural adaptation, and vocational training:

Measure 1: Provision of courses for training teachers in teaching Bulgarian as a foreign language, and additional education support by teacher assistants (persons who come from the children’s countries of habitual residence and who have been through special training).

Measure 2: Ensuring additional training in the Bulgarian language and other subject matters for children in schools and kindergartens.

Measure 3: Provision of Bulgarian language training for beneficiaries of international protection in the towns/cities where they have permanently settled. Bulgarian language courses based on individual programs, vocational training – module “Social Orientation and Cultural Adaptation”, including legal norms in the Republic of Bulgaria.

Measure 7: Development and application of school curricula for learning Bulgarian as a foreign language (approval of the Bulgarian as a second language curriculum developed under a Caritas project).

Issues identified

The Bulgarian language courses conducted by the IC of SAR were ceased in early July after the adoption of the Strategy. According to SAR’s data, 79 children were trained by the IC over the period 1 Jan. 2014 – July 2014. Following this period,

due to the lack of targeted integration measures organized by the Bulgarian state in 2014, Bulgarian language training was further ensured by Caritas-Bulgaria with the financial support of UNHCR – as of November 2014 at all RRCs. Nevertheless, most of the interviewees declare that they do not attend the courses. It is mostly the children of refugees and asylum seekers that avail themselves of this opportunity: 63 children attended the courses in August-November 2014, and 48 of them were issued certificates for completing the Bulgarian language course. By way of comparison, SAR's data for the same period show that a total of 12 such certificates were issued to adults (persons aged over 18), of whom 5 humanitarian status holders, 3 refugee status holders, and 4 asylum seekers.

According to the interviews conducted, the low attendance rate can be attributed, amongst other circumstances, to:

- The lack of enough information about the courses organized, in particular amongst the persons accommodated outside SAR's centres;
- The lack of motivation ensuing from the fact that Bulgaria is regarded as a transit country by most interviewees;
- The impossibility to fully participate in the training process due to either the inability to understand the teacher who speaks only Bulgarian or the trainees' mental state;
- The lack of flexible forms of Bulgarian language training and/or access to daycare/kindergarten for young children, which would enable their mothers to attend the courses;
- The lack of a structured training system, stationery and other training materials.

The interviews with beneficiaries of international protection reveal that while the majority of the men have secondary education, there are persons with higher education, as well as students. Their professional qualifications are: engineers, architects, mechanics, specialists in business administration, economists, accountants, translators, tailors, cooks, etc. The majority of the women interviewed either had been housewives or had never practiced their profession and did not have any experience. Most of them share that their husbands do not object to them having a job.

In 2014 SAR's Centre for Vocational Training ensured vocational training for 77 asylum seekers and refugee or humanitarian status holders by using its own funds: 25 of these trainees sat for an examination and were issued a vocational qualifications certificate. Later on SAR ceased the vocational training courses at the IC, too. An additional 27 persons were trained (cosmetics – 7, hairdressing – 9, tailoring – 11) and 19 of them received certificates (cosmetics – 6, hairdressing – 7, tailoring – 6) under a Caritas-Bulgaria project with the financial support of UNHCR.

Pursuant to the amended Rules of Procedure of SAR, vocational training courses are no longer within the remit of the Agency's responsibilities, which is in contradiction with Art. 53, item 1 of LAR. This is why, SAR has submitted to UNHCR financial estimates of the funds needed in order to keep running the vocational training facilities and prevent the withdrawal of the licenses. As for the long-term development, SAR rely on the Employment Agency taking over the responsibility for the vocational training courses for refugees.

Recommendations and best practices

- *Planning Bulgarian language training which meets the needs of the beneficiaries of international protection*

The measures included in the draft Plan do not specify the duration of the Bulgarian language courses and the number of trainees. The planning of these measures should take into account the experience already accumulated under NPIRRBs. The majority of the respondents who had participated in the 2012 and 2013 programs share their satisfaction with the quality of the trainings; however, they emphasize that the 6-month duration is insufficient and causes difficulties in terms of integration, as the knowledge of the Bulgarian language is a crucial factor for finding a job, and, hence, for ensuring accommodation.

As a result of implementing the recommendations in the 2012 and 2013 monitoring report, the Bulgarian language trainees were regrouped depending on the level of their knowledge; this best practice should be taken into consideration in designing the training modules for the new Program. The training was also accompanied by opportunities to practice the language – at the municipality, the marketplace, on the bus, the purpose being for the trainees to acquire practical skills; this approach has been assessed as extremely useful by the participants in the NPIRRB.

In 2014 all of SAR's accommodation centres had classrooms accommodated for teaching the Bulgarian language. Estimates were made for the financial provision of the teaching activities. The new Plan should determine the procedure for the trainees' promotion to the next training level after being granted a status. The best solution would be a test developed by Caritas and the Regional Inspectorate of Education (RIE).

Yet another example of best practice within the framework of the NPIRRB was the possibility for graduates of the Bulgarian language course at SAR's IC to enroll in courses for acquiring the first qualification degree. EA and SAR had introduced the practice of issuing official notes to refugees which were submitted to the EODs

and were taken into account in service provision.

Caritas-Bulgaria in cooperation with RIE Sofia implemented the project “Access – Program for full access to the educational system for asylum seekers and refugees”³⁰ financed by the European Refugee Fund (ERF). The project pursues to promote a long-term strategy for ensuring full access to the educational system for asylum seekers and refugees under the terms and following the procedure applicable to Bulgarian nationals. Within the framework of the project Bulgarian experts in the area of education designed measures for the integration of refugee children in education: a Bulgarian language curriculum; standardized tests for determining the educational level and degree; a methodology for enrollment in Bulgarian schools; a brochure for teachers working with refugee children; a compendium of linguistic activities and games for training refugee children in the Bulgarian language. The materials produced under the project were submitted to the Ministry of Education and Science (MES) and SAR for approval, which was followed by a lobbying campaign to promote their practical application amongst the responsible state institutions and the relevant stakeholders. Given the efficiency of this beneficial project, the approval procedure for the outputs should be accelerated, and funds should be planned for ensuring the copies needed.

At present Caritas-Bulgaria conducts Bulgarian language classes at the RRCs and TCs of SAR on the basis of a curriculum for teaching Bulgarian as a foreign language. In addition, Bulgarian language textbooks are being developed under a Caritas-Bulgaria project with the financial support of UNHCR (levels A1 and A2). These textbooks can be used to teach both children and adults. The first textbook (A1) has been finalized, while the second one (A2) will have been completed by the end of January 2015. This curriculum is designed so as to prepare children for their access to school education: in addition to basic Bulgarian language knowledge, it contains the necessary terminology in Mathematics, Natural Sciences, Geography, etc. The underlying idea is for the curriculum to be applied in schools where the initial Bulgarian language training will take place, this being the most widely spread practice across the EU. According to RIE’s experts the first step should be identifying the children and setting up small groups for Bulgarian language training. The children can be transported from SAR’s centres or their residence addresses to the nearest schools where the induction Bulgarian language training will be conducted by teachers qualified in teaching Bulgarian as a foreign language. For that purpose, funds need to be allocated for asylum seeking children by SAR, and for refugee children by the municipalities or schools. This is a natural way to facilitate the children’s initial adaptation to the school environment, and to the Bulgarian environment as a whole. RIE’s experts share that a good international practice that could be applied in this

³⁰ For more information: <http://www.caritas-bg.org/web/bg/caritas-bulgaria/deinosti/aktualni/item/3413-dostap-project>

respect is involving refugee children in arts and sports classes together with the other children during the Bulgarian language course.

RIE in cooperation with MES have taken actions to develop an inter-agency mechanism for working with refugee children. Such a mechanism has to be coordinated with the other competent institutions such as the State Agency for Child Protection (SACP), the Ministry of Interior (MOI) and SAR. It should be taken into account that another coordination mechanism to be applied to cases related to asylum seeking and refugee children is being jointly developed by the competent authorities at the national and local level.

- *Planning and implementing additional measures for social orientation and cultural adaptation*

Under the 2011–2013 NPIRRB social orientation and cultural adaptation trainings for newly recognized refugee and humanitarian status holders were not conducted, even though the Program contained this measure. According to SAR's staff interviewed, an example of best practice during the previous programming period were the special arrangements for visits to museums, sight-seeing and trips around the country – such activities can be carried out in cooperation with NGOs and with external financing. A good example that can be replicated is the project of the A25 Cultural Foundation implemented in 2013 and financed by the Program for the Support of NGOs in Bulgaria under the Financial Mechanism of the European Economic Area³¹. A 9-month program was elaborated for the purpose of cultural orientation of refugees and asylum seekers; the program included information provision and participation in various cultural activities in conformity with NIPRRB's social orientation and cultural adaptation courses. Another example of a very cost-effective initiative is the pilot project of Multi Kulti Collective "Walking on foot around Sofia for asylum seekers and refugees in the Arabic, French and English languages" delivered in cooperation with Free Sofia Tour³².

A good practice recommended in the 2012 Monitoring Report are the tolerance classes organized at Philip Stanislavov school No 66, the Spanish Language School No 164, the National Secondary School for Ancient Languages and Cultures, Secondary Schools No 19, 26, 202, and other schools under a project with role plays and parents' involvement, which was developed jointly with volunteers from CVS-Bulgaria.

- *Aligning the vocational training measures with EA's structures*

³¹ For more information: www.ref-life.bg

³² For more information: <http://multikulti.bg/bg/project/bg-tour>

Vocational training is part of measure 3 of the draft National Action Plan which also includes Bulgarian language training and social orientation and cultural adaptation. However, vocational training requires a different approach to planning and resources, and, unlike the other two activities, should be linked to EA's structures and programs. The following additional recommendations can be made based on the previous programming period:

- Providing, in cooperation with EA, more opportunities for various vocational training courses depending on the needs of the target group and in line with the profiles defined in measure 1 of Priority Area 1, instead of offering only three options – tailoring, cosmetics, hairdressing – as it was in the NPIRRB;
- Planning training courses in entrepreneurship and starting up one's own business;
- Planning computer skills training.

2.3.2. Education

Measures planned

Priority Area 2 “Education and Bulgarian Language Training” of the draft National Action Plan for 2014 consists of the following education measures:

Measure 4: Organizing leisure activities for the various age groups.

Measure 5: Carrying out activities aimed at the preservation and development of the cultural identity of children and students of different ethnic backgrounds, including by means of activities in an intercultural environment.

Measure 6: Ensuring access to the mainstream education, and to vocational training and retraining for beneficiaries of international protection under the terms and procedure applicable to Bulgarian nationals. The persons who, due to natural disasters, armed conflicts on the territory of the country where they were educated or other objective circumstances are unable to submit documents certifying the educational degree or qualifications are entitled to request the establishment of these facts under the terms and procedure laid down in the Civil Code of Procedure, in conformity with paragraph § 1 of Ordinance No 2 of 14 April 2003 on the recognition of school classes or educational degrees graduated and professional qualifications acquired on the basis of documents issued by schools in foreign countries.

Issues identified

A major issue in the area of education concerns the fact that refugee children do not as a whole attend school. During the period January-November 2014, 15 refugee children sat for the test at RIE and were included in the Bulgarian education system³³. As for the school year 2014/2015, only 45 refugee children were enrolled in schools (according to MES's data, 167 for the whole calendar year), of whom 19 left the country. According to SAR's data, at present 825 children (aged under 18) are registered (who seek or have been granted asylum) in the country.

The parents interviewed share several main reasons why their children do not attend school:

- The lack of information about the access to the education system in a language they understand;
- The lack of transportation from the RCC to the relevant schools;
- The lack of financial means to cover the costs for attending school (textbooks, clothes, food);
- The lack of motivation, as most of the interviewees perceive Bulgaria as a transit country. In terms of the reasons for settling in a western European country, they indicate the better education opportunities, their children's enrollment at school being considered a long-term commitment to be made in the new receiving country.

At present the applications for taking the test required for determining the class for the child's enrollment are lodged only at SAR's Adaptation department. According to RIE, applications are referred to them only by RRC-Sofia, not by the other centres of SAR. It often happens that the persons who have applied for the test do not turn up to sit for it. In most cases the reason is the lack of information about the time and venue of the test, the impossibility to cover the transportation costs, the lack of information about the consequence from the failure to sit for the exam, etc.

According to the view of RIE's staff interviewed, the institutions do not share sufficient information about the target groups. For example, RIE-Sofia does not have a communication channel established with the social workers at SAR's centres, SACP, and the Agency for Social Assistance (ASA). MES considers that the issues do not stem from the lack of a system for the exchange of information but from the dynamics of the target groups, which makes it very difficult to keep track of the movement of the persons from these target groups among the various institutions.

³³ SAR's data provided at the end of November 2014.

Following the incident in the village of Kalishte, MES dispatched a letter to all RIEs whereby the latter were instructed to strictly abide by the regulations and to inform MES in due time of any such cases.

Asylum seekers and refugee/humanitarian status holders are involved in the OP Science and Education for Intelligent Growth³⁴, which will enable schools to elaborate projects for additional measures and apply for the financing of these projects. The funds allocated will be used for additional training, integration activities, transportation for school children, extra-curricula activities, etc.

Recommendations and best practices

- *Planning special measures for ensuring access to the mainstream education system*

The findings from the interviews conducted point to the conclusion about the need for targeted measures for the purpose of ensuring information in an understandable language and motivating the parents to enroll their children at school. Hence, the main measure in this priority area should be providing parents with information about the options for their children to learn the Bulgarian language and the obligation for the parents to enroll them at school; this can be facilitated by the social workers at SAR's RRCs. This measure can be supplemented with additional awareness raising campaigns about the possibilities for inclusion in the education system. In addition, transportation vehicles have to be secured for children accommodated at SAR's RRCs, which will facilitate their access to school and will enable a balanced distribution of refugee children in various schools, thus helping prevent segregation.

Furthermore, measure 6 does not differ in any way from the effective legal provisions in the area of general support applicable to Bulgarian nationals. The Plan should also provide for special measures, such as developing alternative options for the recognition of diplomas and qualifications for beneficiaries of international protection.

- *Providing for regular training of teachers*

The National Plan does not envisage a measure related to the new challenges teachers face: working in a multicultural environment. Within the framework of the previous programming period, the seminars conducted at the initiative of

³⁴ For more information: <http://eufunds.bg/bg/page/985>

UNHCR in partnership with MES were assessed as best practice in this respect. These are two-day seminars with teachers working with refugee children, whose purpose was exchanging best practices in terms of this target group. The interviewees from MES shared that measures had been taken along this line. In 2014 such training was organized for teachers from RIE-Sofia and RIE-Sliven with funds under the EU Communication Strategy (2014 annual program for Bulgaria). Similar training was also conducted by Caritas-Bulgaria in early November 2014. RIEs propose that these trainings should become a regular practice by means of informal methods for addressing and solving cases.

- *Involving parents in the process of education integration*

The draft Plan does not envisage measures for involving parents in the education process, either, and building up a link between school and parents, as provided for in the NPIRRB. Similar measures are crucial not only in motivating parents to enroll their children at school, but also in facilitating the implementation of measure 5 “Carrying out activities aimed at the preservation and development of the cultural identity of children and students of different ethnic backgrounds, including by means of activities in an intercultural environment”.

- *Lobbying in support of changes in the legislation in relation to the access to education*

According to the MES staff interviewed, the amended article 26 of LAR, as edited in the latest draft version, has to be approved. Furthermore, the issue with the Ordinance No 3 on the Enrollment of Refugee Children in State and Municipal Schools needs to be resolved: even though the legal grounds for the Ordinance have dropped, it is still applied due to the lack of other legislative acts regulating the enrollment of children at Bulgarian schools. The National Education Act should stipulate that where minor and underage aliens who seek or have been granted protection are unable to present a document certifying the education degree or class completed, the school year for enrollment will be determined depending on their age. Such enrollment should be backed up with additional training in the Bulgarian language and other subjects. As for the educational needs assessment, this should be done in the relevant school, which will put in place arrangement for individual support – for example, additional classes in the subject matters where support is needed. Furthermore, measures along this line have to be laid down in the draft Law on School and Pre-school Education.

- *Putting in place a mechanism for the exchange of best practices among schools*

In delivering on measures 4 and 5, due account should be taken of the experience accumulated under the NPIRRB which included numerous actions in this area. In terms of measure 4, examples of best practice are the activities of CVS-Bulgaria and Caritas³⁵, and the project “Success at School” implemented by CERMES³⁶. The latter was about including refugee children in a variety of socialization and educational activities, such as attending the Festival of Science, sport and dance classes, etc.

The MES staff interviewed pointed out that schools organize activities in line with measure 5 in all areas – charity events, thematic exhibitions, discussions on the topic of tolerance towards others, empathy for refugees’ problems. Such practices should be summarized and published on the websites of MES and RIE, and the school headmasters should be regularly informed about these possibilities, so that they are accessible to everybody.

Best practices in area “Education and Foreign Language Training”³⁷

Austria:

Habibi – offers specific language training for healthcare professionals, internships, and assistance in job-seeking. One of the components ensures a course providing additional knowledge and skills for the recognition of foreign diplomas in the AKH hospital in Vienna. The target groups of the support under *Habibi* are recognized refugees, beneficiaries of subsidiary protection, and migrants.

The *Liese-Prokop scholarship* – an Austrian Integration Fund. The Fund awards approx. 30 scholarships to refugees and beneficiaries of subsidiary protection (as well as third-country nationals) for education at Austrian universities.

Canada

Under the *Language Instruction for Newcomers to Canada* (LINC) program the Canadian government provides free courses in French and English for beginners for adult permanent residents. After having their level of competence evaluated, the applicants are organized in different groups. For more information: <http://goo.gl/m9DV>.

³⁵ For more information: <http://refugeeproject.eu/>

³⁶ For more information: <http://www.successatschool.eu/>

³⁷ Identified by UNHCR within the framework of the project “Refugees’ Integration: Capacity and Evaluation”.

Germany

The German government ensures a *German language integration course* for all persons who are expected to be granted permanent residence. The course consists of 600 classes of language training (up to A2-B1 levels under the Common European Framework of Reference for Languages), and 45 classes of cultural and local integration. In addition, there are special courses for women, illiterate persons, and young people. The design of the course for women takes into account any potential differences in the education system of the country of origin. An Integration Certificate is issued, which can facilitate the naturalization process.

The *Office for Immigration Consultations* (Migrationsberatung) provides consultations, through a network of consultation centres, on various topics (incl. education) as part of a mandatory plan for development.

2.4. Analysis of the measures in Priority Area 3 “Employment”

Measures planned

Measure 1: Developing a specialized database on the qualifications of the persons who seek or have been granted international protection (including qualifications declared without the submission of certifying documents), as well as a database on employers offering jobs.

Measure 2: Providing consultations and opportunities for vocational training in view of finding a job, and upgrading courses.

Measure 3: Mediation for the purpose of integration in the primary labour market, referral and inclusion in employment and training programs, incl. within projects under the Human Resources Development OP in conformity with the 2014 National Employment Action Plan.

Measure 4: Organizing information job fairs at SAR's centres where refugees who have the right to employment are temporarily accommodated.

Issues identified

According to EA's data, as of the end of September 2014 the Employment Office Directorates (EOD) across the country had registered as job-seekers 24 refugee or humanitarian status holders, of whom 9 women. The Regional Employment Office Directorate (REOD) Sofia had the highest number of registrations – 14 persons, followed by the REODs in Plovdiv – 6, Blagoevgrad and Haskovo. The job-seekers come from Syria – 11, Iraq – 6, Iran – 3, Armenia – 2, and one persons from, respectively Afghanistan and Nigeria.

From the beginning of the year till the end of September 2014, 55 job-seeking refugee and humanitarian status holders used the mediation services offered by the EODs. Of them 19 are women, 5 are young people aged up to 24 and 10 aged up to 29. Employment assistance was provided to 18 persons, of whom 15 for inclusion in the labor market, and 3 for enrollment in employment and training programs. Jobs were ensured for 3 persons in the third quarter of 2014. By the end of September 2014, 6 persons had been included in training courses for adults: 4 for acquiring professional qualifications, and 2 for motivational training and key competences. In addition, 12 persons living in Sofia were assisted in finding a job at a tailoring workshop in the town of Gotze Delchev – according to EA's information, 7 of them are still in employment.

The refugee and humanitarian status holders registered at the EODs are entitled to all the rights under the Employment Promotion Act regarding EOD's mediation services for employment and training. On 20 February 2014 MLSP approved a training and employment program whose target group are persons who were granted refugee or humanitarian status in 2013 and 2014 and are registered with the EODs, and other beneficiaries of international protection who have "appropriate qualifications and professional experience". The program is designed for implementation across the country and envisages:

- Bulgarian language training: 180 classes for 200 persons;
- Courses for acquiring the first degree of professional qualification or qualification for components of the profession needed for specific jobs: 300 classes for 100 unemployed persons;
- Subsequent subsidized employment for 200 persons over a period of up to 6 months, etc.

In 2014 the above program was not used by any of the beneficiaries of international protection.

The staff of the former IC with SAR and the current Adaptation department still act as intermediaries between asylum seekers and beneficiaries of international protection, on the one hand, and employers, on the other hand; they maintain the list with job advertisements, assist the EA in organizing job fairs and information campaigns.

The other employment measures and initiatives for refugees implemented by the EA include:

- Development of an information brochure translated into Arabic, French and English regarding the mediation services offered by the EODs, which has been delivered to SAR's centres in order to be used by refugees;
- Information meetings at SAR's centres in the neighbourhoods Voenna rampa and Ovcha kupel in Sofia, the village of Pastrogor – Svilengrad municipality, the town of Harmanli, the village of Banya – Nova Zagora municipality, and the village of Kovatchevtzi – Pernik region. These meetings provided refugees with information about the necessary documents for registration with the EOD, the services targeting job-seekers, and the eligibility conditions for employment and training programs. Some of these meetings were attended by potential employers who offered information about their vacancies;
- 111 integration profiles have been drawn up with the relevant educational and qualifications characteristics in order to facilitate finding a job after registration with the EOD.

The status holders interviewed who have employment say that in most cases they work without an employment contract and found the job either with the help of compatriots or on their own. Some of them receive a daily wage of 15 BGN; this amount being insufficient to ensure the family subsistence, they have to rely on loans and remittances from relatives and friends living abroad. Those who do not have such possibilities, live in utmost poverty. Several cases of exploitation by employers have been registered where the refugees were not paid their wages.

The main challenges for the beneficiaries of international protection in the area of employment are:

- The lack of knowledge or insufficient knowledge of the Bulgarian language;
- The lack of documents certifying the educational background and qualifications;
- The lack of qualifications or professional experience amongst the majority of women;
- Problems with the registration by residence address (permanent or current), which impedes registration with the EOD and the use of mediation services.

Recommendations and best practices

- *Ensuring uniformity/consolidation of the databases with the qualifications of persons who seek or have been granted international protection*

Measure 1 in this area overlaps with measure 1 in Priority Area 1. It is not clear whether this database is part of the other one; who is responsible for its development; and which institutions will have access to it. The method for information gathering has not been defined, either. An example of best practice has been identified within the framework of the *Migrapass* project (see below), which helps to link the refugee's previous professional experience with their needs in terms of updating the qualifications. Based on the information gathered, actions can be taken for the validation of the skills and the professional experience accumulated in cooperation with the National Centre for Information and Documentation.

Best practice: The *Migrapass* Project³⁸ offers opportunities for improving the economic integration of migrants and refugees. *The development of a portfolio and the training enables migrants and refugees to put into practice their experience and to assess their competences, and provides them with opportunities for an easier access to the labour market. The portfolio allows to identify and assess:*

- 1) The professional experience accumulated in the country of origin (which is usually ignored in the receiving country);*
- 2) Their informal training (e.g. participation in volunteer activities);*
- 3) The specific competences linked to their life abroad (metacompetences).*

The portfolio developed contributes to enriching the migrants' and refugees' professional profiles with additional competences which are relevant in view of the dynamic labour market where adaptation capabilities and mobility are key advantages in career development.

While such a database is expected to facilitate the initial integration in the labour market, it will not replace trainings in issues such as job-seeking skills, drafting a CV, etc. included in measures 2 and 3. The expert opinion of the staff at SAR's IC should be consulted in relation to the implementation of this measure: within the NPIRRB the Integration Centre maintained a database with information about the educational background and qualifications of the job-seeking beneficiaries of international protection. The database contained all the documents of job-seekers.

³⁸ *Migrapass* is an international project under the Leonardo ds Vinci Program with partners in five countries – Austria (Oikodrom), Bulgaria (CERMES), Spain (University of Burgos), the UK (RoehamptonUniversity), and France (Autremonde and IRIVconseil). For more information: <http://cermes.info/page.php?category=65>

- *Organization of trainings in business start-ups*

“Training of refugees in the development and implementation of small business projects” is a measure set out in the NPIRRB which is included in the new Strategy. The delivery on this measure should continue, as part of the interviewees want to start up their own business and have some experience but do not have information about the arrangements in Bulgaria. Within the framework of the NPIRRB the refugees who wanted to start up a business were referred to the EODs which offer training courses and consultations in this area. SAR’s IC assisted refugees who already had their own business in recruiting appropriate staff who had been trained at IC, and provided help for filling in the forms required by the EODs.

Another example of best practice identified in Bulgaria is the “Business Incubator for Vulnerable Groups”:

*The Business Incubator for Vulnerable Groups Project of the Bulgarian Red Cross is an example of **best practice** for improving the economic integration by fostering entrepreneurship among migrants and refugees. The objective is improving the social status of vulnerable groups and socially disadvantaged people by enabling them to develop strategies for a self-sufficient life, which will facilitate their independent inclusion in the labour market³⁹.*

The project raises awareness about vulnerable and marginalized communities among the public at large through the involvement of volunteer students and private businesses. 30 students from St. Kliment Ohridski University of Sofia have so far been trained in providing social orientation to various vulnerable groups with specific needs. They have been through a number of training seminars conducted by the project partners Baker Tilly Klitou, Microfund AD, St. Kliment Ohridski SU, the Centre for the Transfer of Innovative Practices, and the Bulgarian Red Cross, and have acquired skills to provide regular consultations to beneficiaries in the following areas: assistance in starting up one’s own business; assistance in finding financial support under the form of low-interest microcredits; assistance in applying for additional qualifications before the Employment Agency; consultations in drafting an application for a credit; business plans and other documents needed for starting up a business; individual mentorship at the stages of planning and implementation, monitoring, and support after the start-up.

The representatives of the target groups who wish to be involved in the Business Incubator go for an individual preliminary interview whereby the business idea is evaluated. The applicants approved draw up a personal operational plan; a contract for consultations is signed with them. The consultations rendered to the approved applicants are free of charge.

³⁹ For more information: <http://www.redcross.bg/news/view.html?nid=10525>

15 individual preliminary interviews were conducted under the project in 2012. As a result of them 6 persons were selected – two Bulgarians, two of Roma origin and two migrants – with whom regular consultations were being held. Most ideas related to starting up a small business – a bakery, a fruit and vegetable stand, a shop for clothes.

- *Organization of trainings with staff of the Employment Office Directorates*

A measure assessed by SAR's staff as extremely important is "Organization of training seminars with staff from Employment Office Directorates in relation to their work with refugees". While this measure was not delivered within the 2012-2013 NPIRRB because of the lack of funding, such trainings have been conducted in the past and have proved extremely beneficial as they provide EOD's staff with knowledge about specific features of the target group. According to the EA's staff interviewed, their colleagues from the EODs are interested in such training, which could be organized with the financial support of UNHCR.

- *Improvement of the planning of job fairs and introduction of a requirement for evaluating their efficiency*

Several job fairs have been held within the NPIRRB with the participation of potential employers for the purpose of facilitating the access to employment for refugees and asylum seekers who have the right to work. According to the information from EA and SAR, such job fairs continue to be organized.

In relation to the implementation of this measure, the experience accumulated under the NPIRRB should be taken into account, and an assessment should be made of the number of refugees included in the labour market via these job fairs. The achievement of positive results in the delivery of the measure requires appropriate planning in selecting applicants who have the right to employment and wish to be settled in Bulgaria, as well as employers who operate in sectors whose needs match the job-seekers' qualifications, and the provision of interpreters and facilitators for the meetings. A prerequisite for the success of job fairs are ensuring interpreters and providing employers (not only refugees) in advance with information about the legal provisions on employing refugees and asylum seekers (where the latter have the right to work), the specifics of the target group, the lack of documents certifying professional qualifications, etc.

- *Planning measures for encouraging employers to be involved in the initial integration process*

An example of best practice indicated by several of the experts interviewed is the involvement of potential employers in the initial integration process. There are several cases where the employers provide the worker and his family with accommodation, food coupons, etc. The new Program may envisage some financial incentives for employers who are willing to hire persons who seek or have been granted international protection.

The policy of the *Aladin Foods Company* has been identified as **best practice**. The company which operates in the food industry and has production facilities in the town of Saedinenie has successfully implemented its own mini integration program. A representative of the company visits the RRC-Harmanly every 2 or 3 months and makes job proposals to refugees and asylum seekers in informal talks with them. The company offers employment to both men and women (on the basis of an employment contract and with payment of health insurance contributions), vocational training (4-5 months), as well as opportunities for further development (incl. promotion and higher remuneration). The offer includes free-of-charge accommodation and food for the whole family. Over a period of about 2 years approx. 130 persons stayed in the well-furnished house and worked in the production facilities. In the beginning, the company used to organize at its own expense Bulgarian language courses in the house 3 times a week; this practice was terminated, however, due to the lack of sufficient motivation on behalf of the refugees. Most of the refugee and humanitarian status holders stay in the house for 5 up to 7 months and leave Bulgaria heading for western Europe.

Another type of support is developing and providing brochures with information about workers' rights and obligations in various languages – these brochures reach the workers via their employers.

Other **best practices** in area "Employment"⁴⁰

Austria

The *Mentorship for Migrants* Project of the Chamber of Commerce is a 6-month partnership with experienced managers and well-established members of the business community who support qualified migrants in their efforts to get integrated in the Austrian labour market. The support includes identifying talents and skills, providing a realistic perception of the Austrian business environment, facilitating the process of applying for a job, and networking. 700 mentor couples have been set up since the start-up of the project – both partners

⁴⁰ Identified by UNHCR within the framework of the project "Refugees' Integration: Capacity and Evaluation".

in these couples assess the partnership as beneficial. For more information: <http://goo.gl/vP5qBm>.

The *Consultation Centre for Migrants* operates in close cooperation with Caritas and People's Aid Austria and has developed a program for facilitating refugees' access to the labour market by means of employment based on better qualifications; the program supports improving the linguistic competence and acquiring an Austrian document certifying previous experience for the purpose of involvement in internship programs. In addition, the Information Centres, which cover the whole territory of the country, assist refugees in their preparation for employment by means of consultations, information about the recognition of qualifications and training courses related to qualifications acquired in the past. The Centres also establish links with other agencies, facilitate the provision of documents, and cover the costs for translation and notarial certification and legalization. For more information: www.berufsanerkennung.at.

France

The *Refugee Forum* (Forum Réfugiés) organizes courses in professional French as a second language for refugees who have been approved for jobs in social enterprises. For more information: <http://goo.gl/KySE0x>.

The *French University Peer Support* (Entraide Universitaire Française, EUF) awards scholarships to over 130 refugees on an annual basis for the purpose of continuing their university education in France. Since 1945 approx. 15,000 scholarships have been awarded mostly to refugees aged under 28. The refugees aged under 28 are eligible to apply for scholarships provided by the Regional Centre for University and Research Activities (Centre régional des oeuvres universitaires et scolaires, CROUS) without being subject to the requirement for a minimum duration of their stay in France. The Association for the Reception of Refugee Doctors and Medical Staff (Association d'Accueil aux Médecins et Personnels de Santé Réfugiés en France, APSR) supports the integration in the French health system of healthcare specialists who have been educated in their countries of origin.

Sweden

Steps in the Job (integsjobb) pursues facilitating the access to employment for immigrants provided that in parallel with their job they learn Swedish at the Swedish for Immigrants Institute (SFI). Employers receive a subsidy in the amount of 80% of the salary costs for a period of 6 up to 24 months. For more information: <http://goo.gl/201iLz>.

In 2010-2012 the government contracted the development of professional mentorship for refugees to 9 NGOs. The refugees are organized in groups with mentor depending on their professional background with a view to preserving their professional identity and providing access to mentor networks. For more information: <http://goo.gl/L9y7rD>.

2.5. **Analysis** of the measures in Priority Area 4 “Procedure for the Recognition of Qualifications”

Measures planned

The draft Plan sets out the following measures in Priority Area 4 “Procedures for the Recognition of Qualifications”:

Measure 1: Assisting beneficiaries of international protection in relation to the recognition of diplomas, certificates and other documents for professional qualifications issued in foreign countries under the same terms and following the procedure applicable to Bulgarian nationals.

Measure 2: Facilitating the access to procedures for the recognition of a declaration whereby a foreigner certifies the circumstances relevant to the issuance of a certificate of good conduct.

Measure 3: Facilitating the access to qualifications recognition procedures for beneficiaries of international protection who are unable to submit any proof of their qualifications by means of: appropriate evaluation schemes; validation and accreditation of previous education/training; priority inclusion in programs for training persons who either have low education or are unable to prove the educational level/degree completed.

Issues identified

The main concern in this area is the impossibility for most of the interviewees to present diplomas whereby they can certify their educational background or professional qualifications. While those who have a document certifying the educational degree acquired in a foreign country can use for the purpose of recognition the regulated procedure conducted by the National Centre for Information and Documentation with MES, there is no such procedure in place for those who are unable to prove their education or qualifications. This is a very

serious issue which cannot be resolved when it comes to regulated professions due to some additional requirements⁴¹ which refugees can hardly meet, such as:

- Certificate of good conduct from the country of origin with a 6-month validity as from the date of issuance;
- Knowledge of the professional terminology in the Bulgarian language;
- Higher educational degree required in Bulgaria.

Moreover, according to EA's staff interviewed, even in cases where the persons concerned are registered as unemployed with the EOD and want to enroll in vocational upgrading courses in order to have a certificate issued, the beneficiaries of international protection have to meet the eligibility requirement for a minimum educational level – basic or secondary education – which they are often unable to prove. In case no proof is provided, the document issued as a result of the course is a certificate of vocational training completed but not of professional qualifications acquired.

Recommendations and best practice

In addition to being crucial to the integration of beneficiaries of integrational protection on the labour market, the measures in this Priority Area are very important for Bulgaria – given the dynamic process of highly qualified Bulgarian specialists leaving the country and emigrating elsewhere, the state cannot afford a situation where highly qualified specialist settled in Bulgaria are exposed to the risk of losing their qualification.

- *Establishing a procedure for the validation of the qualifications of persons who are unable to prove their professional qualifications*

A procedure should be put in place for the validation of the qualifications of persons who are unable to present documents certifying their qualifications. As regards the regulated professions, these procedures need to be developed in cooperation with representatives of the relevant chambers or professional associations. An issue to be addressed concerns the additional requirements that cannot be met by beneficiaries of international protection.

Best practices in area “Procedures for the Recognition of Qualifications”⁴²

⁴¹ For more information, see the National Strategy for the Integration of Persons Granted Integrational Protection in Bulgaria (2014–2020), p. 20

⁴² Identified by UNHCR within the framework of the project “Refugees’ Integration: Capacity and Evaluation”.

The United Kingdom

Medical Profession Project: A program of the Refugee Council financed by the National Health Service (NHS), London, which assists refugee doctors settled in London in acquiring requalification in line with the UK standards and in finding employment in conformity with their professional qualifications. The PLAB (Professional and Linguistic Assessment Board) tests are the main tool whereby foreign medical doctors can demonstrate that they have the necessary knowledge and skills for practicing the medical profession in the UK. The project offers a variety of services supporting the requalification of refugee doctors, including free-of-charge 6-week preparatory courses for the 1st and 2nd part of the PLAB test, as well as medical internships for those who have passed the 2nd part. The project has so far proved to be a success encompassing 50 refugee doctors per year. Other similar projects in the UK target teachers, nurses and researchers. For more information: <http://goo.gl/gn35o8>.

Ireland

Quality and Qualification Ireland (QQI) assesses migrants' qualifications by comparing them with the Irish system and issuing a certificate of equivalence. The service is free-of-charge.

Pan-European

ENIC-NARIC is a European Network of Information Centres – *National Academic Recognition Information Centre*; it is represented in various European countries. The ENIC-NARIC Centre is an information centre for the professional and academic recognition of qualifications. The Centre facilitates the recognition of qualifications, educational and training programs graduated abroad. If official validation of qualifications is not required, ENIC-NARIC Austria can provide, free-of-charge within 2-3 weeks in response to an inquiry, incl. an informal one (by e-mail), a letter assessing foreign academic training or diploma which conform to the Austrian standards. For more information: <http://www.enic-naric.net>.

- *Planning specialized linguistic training*

Language programs/internships are needed in order for the beneficiaries of international protection to acquire knowledge about specific professional terminology.

An example of best practice in this respect is the specialized Bulgarian language course under the Caritas project organized by the Institute for Foreign Students

(IFS) with the financial support of UNHCR; the target group covers refugees who wish to continue their education at universities in Bulgaria and pursue a career development in a certain professional area. The course held in October-December consisted of 50 classes.

France

The *Refugee Forum* (Forum Réfugiés) organizes courses in professional French as a second language for refugees who have been approved for jobs in social enterprises. For more information: <http://goo.gl/KySE0x>.

- *Planning measures for proving professional knowledge and skills before the an evaluation board of the National Chamber of Crafts (NCC)*

The interviews conducted show that a substantial part of refugees are craftsmen. A measure included in the new National Strategy which was part of the NPIRRB is “Ensuring the participation of refugees in examinations for proving the level of professional skills before an evaluation board of the National Chamber of Crafts”. SAR’s IC assisted the refugees who wanted to sit for the examination before NCC. Such an activity should be included in ICC’s activities.

2.6. Analysis of the measures in Priority Area 5 “Social Assistance”

Measures planned

Measure 1: Access to social assistance, as regulated in respect of Bulgarian nationals, incl. monthly social aids, one-off aid for buying clothes, textbooks or medicines, and targeted aid for the issuance of an ID.

Measure 2: Ensuring access to interpreters/translators or mediators, when needed, for the purpose of filling in the data required in applications (declarations for social assistance) and means-testing forms.

Measure 3: Providing social services for accommodation at temporary and emergency centres.

Measure 4: Building up a network of social mediators.

Issues identified

Pursuant to the Bulgarian legislation, the beneficiaries of international protection are entitled to the same social assistance and services⁴³ as Bulgarian nationals. The exercise of these rights implies the same procedures as the ones applicable to Bulgarian nationals. As a result of the lack of information and support for involvement in the procedures, few beneficiaries of international protection avail themselves of this opportunity – a fact which does not, however, preclude the need for applying the procedures. The problems identified in 2014 relate to the absence of specialized integration measures and financial support for newly recognized refugee and humanitarian status holders, which resulted in difficulties in issuing IDs for them. Hence, the persons concerned were not able to exercise their social rights⁴⁴. The limited possibilities for learning Bulgarian and the lack of social mediators who could provide help made the situation with the exercise of the rights even more complicated.

The data provided by ASE to the survey team confirm the above issues. In 2014, 4 persons and refugee families received monthly aids under Art. 9 of the Regulation for the Implementation of the Social Assistance Act; 3 persons and families received one-off aid under Art. 16 of the Regulation, 2 persons and families were supported under the terms of Ordinance No ДА 07-5/2008 regarding targeted aid for heating; 1 persons received one-off aid for the issuance of an ID; and 2 persons received support under the Integration of People with Disabilities Act (IPDA).

Recommendations and best practice

- *Planning specialized measures for access to social assistance*

The Action Plan for integration should define simplified social assistance procedures, which will be part of the measures for the initial integration of beneficiaries of international protection. Therefore, the Social Assistance Agency should be involved in the process from its outset when the integration agreement is signed.

It is imperative for the financial support provided to refugee and humanitarian status holders to be resumed as soon as possible, as the lack of any support

⁴³ See the Social Assistance Act, the Regulation for the Implementation of the Social Assistance Act (RISAA), Decree 69 of 27.03.2009 on Amendments to RISAA, Integration of People with Disabilities Act, etc.

⁴⁴ Legal Protection of Refugees and Migrants Program (2014): Annual Report on the Monitoring of the Status Determination Procedure in Bulgaria, p. 15 http://www.bghelsinki.org/media/uploads/documents/reports/special/2014-bhc-annual-rsd-monitoring-report_bg.pdf

impedes the exercise of basic social rights. This requires developing, in cooperation with the municipalities, a mechanism for the payment of the aid to status holders. Within the NPIRRB a stipend and a one-off aid were paid after the fourth month of participation in the Program. The basis for determining the amount of the stipend was the amount of the stipend for the training of unemployed people approved by the government and set out in the annual National Employment Action Plan.

The experience with the implementation of the NPIRRB shows that the payment of the stipend after the fourth month complicates the participants' financial situation, as the highest expenditures are incurred upon enrollment in the Program: payment of the deposit fee, the commission fee of the real estate agent, ensuring furniture and appliances, etc. Further support received was assistance in the issuance of IDs, cards for the public transport, etc.

- *Including social mediators in the social assistance activities for refugees*

This measure would contribute to delivering on CBP *"Access for immigrants to institutions, as well as to public and private goods and services, on a basis equal to national citizens and in a non-discriminatory way is a critical foundation for better integration"*. It was included in the NPIRRB but was not applied by the end of the Program in 2013. Similar programs were developed by the Bulgarian Red Cross (BRC) and the Council of Refugee Women in Bulgaria in respect of asylum seekers with financial support from ERF and were assessed as extremely beneficial. In relation to the National Plan, the experience accumulated under the NPIRRB should be taken into account, and such programs should be planned in the long term with state financing, not based on the principle of project financing.

- *Regular training seminars with social workers on specific aspects of the social work with refugees*

In 2013 training seminars were conducted under the project "Training of employees from institutions and organizations involved in the implementation of refugees' social and economic rights – employees from the Employment Office Directorates, social workers from the Social Assistance Directorates and Child Protection Directorates, teachers from schools with refugee children, employers, etc. by means of intra-institutional seminars for exchanging experience and best practices in working with refugees and for improving the protection of their social and economic rights". The project was implemented by the Association for Pedagogical and Social Assistance for Children FICE-Bulgaria with financial support from the 2011 ERF Annual Program; the project was highly appreciated

by the staff of SAR's IC interviewed. These seminars were assessed as best practice which should be analyzed and replicated.

2.7. Analysis of the measures in Priority Area 6 "Healthcare"

Measures planned

Measure 1: Providing health services under the same conditions as for Bulgarian nationals.

Measure 2: Taking anti-epidemic measures in conformity with the effective legislation.

Measure 3: Building up a network of health mediators.

Measure 4: Carrying out prophylaxis activities.

Measure 5: Ensuring the mandatory immunization and re-immunization in conformity with the National Immunization Calendar for refugee and humanitarian status holders in respect of whom data about immunizations made is missing and who do not have a family doctor.

Measure 6: Developing a database on refugee doctors who are already practicing in Bulgaria, in particular of Arab origin, and who can be involved in the activities with refugees (new)⁴⁵.

Measure 7: Developing information materials for family doctors with information about the cultural and religious specifics of the various groups of refugees (new).

Issues identified

The refugees interviewed share the following problems related to their access to health services:

- Insufficient information about the Bulgarian health insurance system in a language they understand – most of the interviewees are even unaware of their right to choose a family doctor (a GP). Those who have found a job

⁴⁵ The last two measures have been proposed by an NGO for inclusion in the draft National Plan of early November 2014.

say that they have a family doctors, but they have never visited them and do not know them;

- Linguistic barrier and the lack of interpretation services;
- Lack of health insurance due to insufficient financial means for paying the contributions;
- Unwillingness of GPs to have refugee and humanitarian status holders on their patients' lists. According to volunteers interviewed in Stara Zagora, only 4 out of 130 registered GPs agreed to accept refugees as their patients. A case has been registered where a referral by a medical specialist was disregarded. In another case children were refused consultation by a hospital in Svilengrad, as the parents had their residence address registration in Bourgas;
- Lack of money to buy the medicines prescribed and to see dentists;
- Lack of financial means for transport in order to return from the hospital after being taken there in an ambulance;
- Need for psychological support which is not available to everybody in need of it, as such support is provided by NGOs on the basis of projects: ACET under ERF-funded programs, and Nadya Centre with the financial support of UNHCR.

Recommendations and best practice

- *Planning for resources to cover the health insurance of individuals involved in the Integration Plan*

Beneficiaries of integrational protection have access to health services under the terms and following the procedure for Bulgarian nationals and have all the rights of the beneficiaries of mandatory health insurance⁴⁶. Measure 1 "Providing health services under the same conditions as for Bulgarian nationals" in Priority Area 6 has a rather broad scope, which makes it difficult to understand its content; however, what should be covered are the health insurance contributions for the participants in the Plan, similar to the NPIRRB. This requires a specialized integration measure, instead of relying only on the general one targeting Bulgarian nationals.

In view of the needs ensuing from the specific situation of this group, additional targeted financing should be ensured both for medical consultations and financial incentives for general practitioners providing health services to this group⁴⁷.

⁴⁶ See Art. 35 of the Health Insurance Act.

⁴⁷ This proposal resulted from a meeting of representatives of the National Association of General Practitioners in Bulgaria with representatives of UNHCR, the Council of Refugee Women in Bulgaria, SAR, held on 11 December 2014.

- *Providing monthly information to general practitioners about persons who have had their Alien's Personal Number replaced with a Unique Civil Number*

Potential sources of such information are NHIF, RHIFs or NRA. The information can be provided either directly to GPs or via SAR which keeps record of the GPs who have refugees on their patients' lists.

- *Expanding the network of social mediators, instead of building up a network of health mediators*

This measure overlaps with the development of a network of social mediators. The function could be performed by social mediators who are trained in supporting access to all kinds of public services, in particular by ensuring interpretation into a language understandable to refugees.

- *Attracting refugee doctors, who already have a job in Bulgaria, in working with refugees only as an accompanying initial integration measure*

This has been assessed as best practice which has already occurred on an hoc basis. For example, most of the interviewees in Pazardjik see an Iraqi family doctor. While these doctors can assist in the initial integration of newly recognized refugee and humanitarian status holders, they should not replace the activities with GPs aimed at raising their awareness of the target group, the issues with the lack of medical records, and the equal healthcare rights with those of Bulgarian nationals. This measure should be applied very carefully in order to avoid segregation of the communities.

- *Planning measures for raising the awareness of general practitioners about the rights of refugee and humanitarian status holders*

Information materials are a very good but insufficient tool for raising awareness amongst doctors. Trainings need to be organized similar to the ones conducted by NGOs for the staff at the centres for the detention of irregular migrants with MOI or ESA's staff. In addition to the measures focused on the cultural and religious characteristics of the various groups of refugees, doctors should acquire knowledge about the rights of refugee and humanitarian status holders. The interviews with experts, for instance, reveal that a major reason why doctors refuse to work with refugee patients is the lack of information about the fact that

the services provided to these individuals can be covered by the Health Insurance Fund.

2.8. Analysis of the measures in Priority Area 7 “Housing”

Measures planned

Measure 1: Assistance in finding rented housing.

Measure 2: Monthly financial aid for paying the rent during the period of participation in the National Program for the Integration of Beneficiaries of international protection.

Measure 3: Developing programs at the municipal level for promoting interest amongst landlords and ensuring control over rental relations.

Issues identified

In 2014 the housing issue was further complicated in the context of missing targeted integration measures for supporting refugee and humanitarian status holders. Newly recognized beneficiaries of international protection have to leave the RRC within 14 days after receiving the status. This very short time limit for moving out of SAR’s accommodation facilities was already identified as one of the factors for homelessness amongst refugee and humanitarian status holders back in 2012; the lack of financial support for housing further aggravates the problem⁴⁸. By way of a temporary measure, this time limit can be extended up to 6 months as from the date of receiving the status, in particular for vulnerable groups. There is no mechanism to identify such persons, which is a prerequisite for arbitrary judgments – inappropriate provision of accommodation to some individuals and unjustified refusal to others. The interviews conducted revealed corruption schemes with the involvement of SAR staff (the warders) who force some families to move out unless they “make the payment due”.

The impossibility for refugees to apply for and be accommodated in municipal housing right after receiving the status has been identified as a long-term and unresolved issue. This stems mainly from the requirements laid down in the ordinances of municipal councils regarding Bulgarian citizenship of at least one member of the family applying for municipal housing, and a certain period of

⁴⁸ See Pamporov, A., Vankova Z., and Shishkova, M. (2012): Where is My Home? Homelessness and Housing amongst Asylum Seekers and Refugees in Bulgaria.

permanent registration on the territory of the municipality – similar requirements also result from the deficit of municipal housing, especially in large cities.

The only option for most beneficiaries of international protection is renting premises through a real estate agent, compatriots or friends; this option, however, is almost unaffordable for people who cannot rely on either remittances from relatives or earned income. The interviews revealed a number of issues:

- Abuse by some landlords who take advantage of refugees' inability to speak Bulgarian and their lack knowledge about the local context;
- Higher amounts of the commission or rent charged by some brokers and landlords;
- Refusal by some landlords to rent premises to refugees for reasons of race, nationality, religion or numerous children in the family.

Recommendations and best practice

- *Planning measures for raising the awareness of potential landlords and real estate agencies at the local level*

The support for rented housing should be services provided by the ICC and the network of social mediators in cooperation with NGOs and real estate agencies. This support has to be accompanied by measures for raising the awareness of potential landlords and real estate agencies: information materials and/or information meetings on the rights of refugee and humanitarian status holders, their culture and customs, the target group being potential landlords.

- *Providing for monthly financial aid for rent payment during the period of participation in the Integration Plan*

This was the practice within the NPIRRB, which should be taken into consideration in view of the new Plan. All the interviewees who participated in the Program in 2012 and 2013 point out that the housing financial aid is far from being sufficient in terms of both its amount and duration. According to refugee and humanitarian status holders, the aid received did not allow them to rent premises meeting their needs – the amount of the aid had not been updated in line with the changes on the market over time. While the NPIRRB regulated the possibility for covering utility expenditures, the financial aid paid was determined on the basis of the amount of the rent in the rental contract. As the

Program did not envisage financial aid for furniture and other basic items; hence, the participants were dependent on the support rendered by NGOs, such as the Council of Refugee Women in Bulgaria, informal groups such as Friends of Refugees, etc. who organized donation campaigns for collecting second-hand clothes, utensils, and furniture for needy refugees. The requirement in terms of a rental deposit and a commission fee for the real estate agent further aggravates the situation of newly recognized beneficiaries of international protection who do not rely on remittances from relatives living abroad.

In addition to the above, there were substantial delays in the payment of the financial aid resulting from the inefficient coordination mechanism between SAR and BRC for the payment of the monthly aid, and the time needed for handling the documentation for involvement in the Program. This was one of the reasons for drop-out, the participants being forced to seek employment in order to secure their own subsistence and of their families.

- *Planning measures for encouraging municipalities to actively commit to the process of integration of refugee and humanitarian status holders*

A major success of the Strategy, the Action Plan and the new National Program would be the involvement of Bulgarian municipalities in the drafting and implementation of the policies and measures for refugees' integration. The experience accumulated in the delivery of the NPIRRB shows that in spite of the efforts made to commit the municipalities to the process of refugees' integration in Bulgaria by means of working meetings and seminars organized every year, the attempts to develop cooperation with the municipalities have failed. The delivery on measure "Developing programs at the municipal level for promoting interest amongst landlords and ensuring control over rental relations" depends on involving the municipalities as an equal partner in the integration process. According to the staff of the central and local administration interviewed, the municipalities are ready to get involved in the new integration program provided that the state ensures both the funds for that purpose and the financial estimates of the costs to be covered.

Best practices in area "Housing"

Finland

An example of best practice in this respect is set by the *Spirit Project* of the Finnish Red Cross⁴⁹, which encourages municipalities to be actively involved in the process of the reception and integration of asylum-seekers and refugees in Finland. The project has the following achievements:

- A well-developed network of volunteers, a manual for volunteer activities for the reception and integration of asylum-seekers and refugees at the local level – thus support at the local level has been ensured for refugees in the integration process;
- Information seminars for municipalities;
- An awareness-raising campaign targeting the local community, incl. schools;
- A training module designed for municipalities, schools and other stakeholders, whose purpose is to raise the awareness at the local level about the challenges refugees are faced with and the mechanisms used to meet their needs.

Austria

People's Aid Austria Vienna – Flatworks Project: This project targets newly recognized refugees and beneficiaries of subsidiary protection who are provided with cooperative housing, consultations and counselling. The organization acts as an intermediary and contributes to better awareness of the Austrian society, system and communities. The project also offers co-financing for rented housing which is repaid by the tenant within two years. A disadvantage of the project is its small scale and limited availability of housing.

Integration House /Diakonia/ People's Aid – Kosmopolis Project: The target group are employed refugees, beneficiaries of subsidiary protection, migrants and local inhabitants. The project provides support for accommodation and integration, consultations and financial advice concerning rental relations, administrative procedures, the buddy system, and conflict settlement in Vienna.

Diakonia Refugee Service Vienna – Future Space Project (Zukunftsraum): This project targets newly recognized refugees aged under 18 who were previously part of the social assistance system in Vienna; the beneficiaries are assisted in making their first steps towards a self-sufficient life. The project offers accommodation at integration-oriented apartments, consultations and planning, and provides professional counselling and internships.

France

A variety of organizations are focused on the provision of temporary accommodation for refugees with a view to achieving a more efficient rotation system at the reception centres and temporary support to refugees who are unable to ensure accommodation on their own. The services include:

⁴⁹ For more information: http://ec.europa.eu/ewsi/en/practice/details.cfm?ID_ITEMS=20277

- *Temporary Accommodation for Refugees* (Le Dispositif provisoire d'hébergement des réfugiés, DPHRS) offers 6-month shared accommodation of refugees with refugee families and assistance for finding long-term accommodation.
- The *Committee for Helping Refugees* (Comité d'Aide aux Réfugiés, CAAR) in Bois Colombes offers 6-month accommodation for 9 refugee families against 20% of their income.
- The *Group for Reception and Solidarity* (Groupe Accueil et Solidarité, GAS) in Villejuif offers 20 apartments for temporary accommodation of refugee families for 1 year with possible extension of this period.
- The *Service for Refugee Inclusion* (Service d'Insertion Réfugiés) in O Reine department assists 45 households in getting access to public or private housing.

The **Network for Employment and Housing of Refugees** (Réseau pour l'emploi et le logement des réfugiés, Reloref) of France Terre d'Asil (FTDA) in Maine et Loire department, France, has signed an agreement with the prefecture and maintains 80 apartments for refugees per year; in Rhone department, with the support of Accélair, refugees have access to accommodation within 9 months (compared to 44 months for the applicants for municipal housing).

The *Refugee Forum* (Forum Réfugiés) and *France Terre d'Asile* have put in place large-scale programs (respectively, *Accélair* and *Reloref*) whose purpose is raising the awareness of landlords on refugee matters. The *Accélair* program in Rhone department supports all refugees accommodated in or outside reception centres, in close cooperation with the local institutions and NGOs by covering all beneficiaries of international protection. *Solibail* started in 2008 in Ile de France and aims at ensuring that landlords receive the monthly rent due in spite of the fact that their tenants are socially disadvantaged people. A part of the rent is paid by the refugee, and the other part by the French government.

France Terre d'Asile – CAP'I Mobilité program was introduced in 2007 for the purpose of facilitating refugees' integration by means of geographic mobility. The program pursues making use of the availability of social housing in smaller settlements. In 2011, 280 persons were resettled in other French regions via the program.

Sweden

Ostersund municipality in northern Sweden received 320 refugees in 2013. The municipality decided to renovate the existing properties, thus making up for its limited housing fund, and provide accommodation opportunities for more refugees. In addition, the *Östersundshem* municipal housing campaign has allocated 10% of the available housing to refugees.

2.9. Analysis of the measures in Priority Area 8 “Refugees’ Integration in the social, economic, cultural, and civil life of the Bulgarian Society”

Measures planned and recommendations

The measures proposed in this area should not be planned in a separate group; they should be mainstreamed in various priority areas with clearly defined responsibility levels – responsibilities of public institutions at the central and local level. A worrisome aspect of the new approach to refugees’ integration is that while its success relies particularly on municipalities’ involvement in the process, the planning of measures for an improved working dialogue with the local authorities is in its initial phase. Under the usual scenario, such a measure precedes the relevant public policy.

*Measure 1: Ensuring transportation funds in cases of referral to a municipality – **should be part of a NEW Priority Area – provision of an initial integration package.***

*Measure 2: Implementation of joint programs, projects and agreements with educational establishments – universities, schools, institutes, training facilities, etc. – for organizing joint activities with Bulgarian citizens and refugees on issues such as integration, anti-discrimination and equal treatment – **should be part of Priority Area 1 – provision of information or in a separate area on anti-discrimination issues.***

*Measure 3: Implementation of programs, projects and agreements with Bulgarian and foreign media with a view to promoting the image of beneficiaries of international protection in Bulgaria, and awareness raising – **should be part of Priority Area 1 – provision of information.***

*Measure 4: Implementation of programs, projects and agreements with Bulgarian businesses aimed at facilitating the access to the labour market in Bulgaria – **should be part of Priority Area 3 – employment.***

Measure 5: Deepening the working dialogue with the structures of local authorities – organizing joint seminars, roundtables, trainings.

*Measure 6: Training in skills for working with beneficiaries of international protection for staff of institutions that are directly involved in the provision of information and services – **should be part of all priority areas.***

*Measure 7: Motivation training for children, teachers and parents in relation to support and promotion of integration in the education system – **should be part of Priority Area 2 – education.***

*Measure 8: Organizing roundtables with the participation of representative of the executive power, the local authorities, NGOs, the academic community, and well-known personalities committed to the cause – **should be part of Priority Area 1 – provision of information.***

*Measure 9: Developing and including qualifications courses in M.A. programs and ongoing training curricula for specialized staff in relation to the specifics of working with refugees – **a very important measure which should be part of area “Education”, and should be implemented either in cooperation with universities or by means of a new priority area “Administrative capacity Building”, which will include all training courses relevant to the central and local administration.***

2.10. Analysis of the measures in Specific Area 1 “Integration of Vulnerable Persons with Special Needs (pregnant women, single mothers, persons with disabilities, victims of torture or serious forms of physical, psychological or sexual and gender-related violence)”

Measures planned

*In the **National Plan**:*

Measure 1: Development and implementation of specialized programs for specialists in the social area on individual activities with vulnerable beneficiaries of international protection

Measure 2: Development and implementation of individual programs for training of and cares for newly recognized beneficiaries of international protection who are vulnerable or with specific needs.

***The Strategy** envisages less specific measures for addressing the difficulties in the integration of this specific group; the National Action Plan includes:*

Measure 1: Ensuring Bulgarian language and vocational training by means of flexible training forms.

Measure 2: Providing psychological support which should be timely and tailored to the specific situation of this category of individuals.

Measure 3: Ensuring access to community-based rehabilitation and support services for the members of the target group in accordance with their needs and individual features.

Issues identified

Over recent years, there has been a stable trend of growing numbers of vulnerable refugee and humanitarian status holders – this has been reiterated by SAR’s staff interviewed. While vulnerable persons face the same challenges as the remaining refugee population due to the lack of integration measures, their situation is even more difficult – the information deficit, the absence of financial support and psychological help have been identified as the most typical problems.

According to SAR’s staff interviewed, “progress has been made in working with this group”. A new Socially Vulnerable Groups department has been set up within the Social Activity and Adaptation Directorate for working only with vulnerable groups. Furthermore, a special register has been introduced for the registration of persons with special needs, vulnerable and unaccompanied minor and underage applicants for international protection. Designing a quality matrix for working with vulnerable groups has been planned in cooperation with EASO, which will facilitate the team’s performance.

Recommendations

Within the NPIRRB in 2012, a Regulation on applying the measures for social protection of persons with special needs who seek or have been granted international protection was adopted. The Regulation lays down the terms and procedure for the provision of support to this group of individuals, the measures for their social protection and integration in the Bulgarian society, which should be taken into account in developing the Program, the Strategy and the Plan.

Under the circumstances of limited resources, the measures applied in practice did not differ much from the ones designed for all newly recognized beneficiaries of international protection. Nonetheless, the measure set out in the above rules about drawing up individual plans should serve as the foundation for the new integration approach to the beneficiaries with special needs. Based on an interview and the file of the person concerned, an individual program is elaborated, as described in the individual integration plan. The program specifies

the need for psychological help, rehabilitation, retraining, etc. The provision of flexible forms of Bulgarian language and vocational training must be part of the measures tailored to this target group.

2.11. **Analysis** of the measures in Specific Area 2 “Protection and Integration of Unaccompanied Children”

Measures planned

Measure 1: Provision of representation for unaccompanied minor and underage persons by means of legal guardianship or, where needed, an organization in charge of cares for and the welfare of children, or any other appropriate form of representation, incl. the ones regulated by law or ensuing from the case law.

Measure 2: Assistance and referral to community-based social services for minor and underage beneficiaries of international protection, and provision of accommodation in line with the principle of the best interest of the child. Organizing protection measures in conformity with the effective Bulgarian legislation: placement with families of relatives and friends, foster families, residential social services or specialized institutions.

Measure 3: Development and implementation of programs for the integration of children and the prevention of risk behaviour.

Issues identified

The main issue in this area is the persisting absence of a legally regulated procedure for appointing a legal guardian, which can be addressed only by means of appropriate amendments to LAR⁵⁰.

SACP continues its efficient contribution to the implementation of the Agreement between SACP and SAR regarding an improved access for children to their rights signed on 26 November 2013. The Agreement provides for the adoption of measures for the priority inclusion of all unaccompanied children in social services (in particular, the ones in the age group between minority (16) and maturity (18)). Furthermore, the Agreement regulates the access for all SACP teams to SAR's accommodation centres for the purpose of monitoring, provision

⁵⁰ For more information, see the Monitoring Report for 2013 accessible at the website of the Bulgarian Council on Migrants and Refugees: <http://www.bcrm-bg.org>

of support and consultations on the observance of children's rights and their best interest.

SAR has regularly provided SACP with information gathered through an information card. SAR's staff have also reported that the centre designated for the accommodation of unaccompanied children is RRC-Banya, whose facilities are being expanded and renovated. SAR continues helping SACP by means of interpreters with rare languages in relation to the provision of special services for children. Over the period January-October 2014, a total of 9 underage persons have been covered – 2 were placed in a family environment, 1 was placed in a specialized institution, and 6 were placed in residence-type social facilities. As for the countries of origin, these are Syria (4 children), Cote d'Ivoire (an underage mother and her baby), Ghana (1 child), Pakistan (1 child), Iraq (1 child).

An additional program to the foster care methodology has been developed for training professional foster families in working with refugee and asylum-seeking children. According to SACP's experts, there are foster families who are willing to take over refugee and asylum-seeking children, if provided with financing for that purpose.

Recommendations

- *Ensuring uniform procedures for working with unaccompanied children in all reception centres of SAR*

According to SACP's expert interviewed, while the inter-agency coordination has improved compared to previous years, uniformity should be achieved in terms of the procedures for working with this target group, the documentation and the operational approach applied in the various centres. SACP can act as coordinator of this process, including with respect to the procedures for tracing unaccompanied children, family reunion, and collecting information about the particular case, identifying potential legal guardians.

- *Planning for more human and material resources at RRCs and financial provision for these resources*

RRC-Banya should be provided with more human and material resources on the basis of the model at RRC-Sofia – ensuring social workers who can devote more time to individual work with the target group; organizational support from the national level to ASA's regional structures; and assistance for RRCs. In addition, regular trainings for enhancing the capacity are needed in order to safeguard the

child's best interest. Financing should also be ensured for specialized translation/interpretation during the field work of ASA's staff, as it is not possible to rely only on SAR's interpreters in the long run.

- *Broadening the range of social services*

According to SACP, the centres for family-type accommodation and public support are willing to work with unaccompanied children. These centres can serve the purpose of initial integration – by means of psychological support, learning the Bulgarian language, logopaedic help, providing knowledge about the Bulgarian culture, education, traditions. Accommodating refugee children together with Bulgarian children in the centres for family-type accommodation will be beneficial for facilitating the process of adaptation. Social and educational activities have to be ensured at RRC-Banya, similar to RRC-Sofia, in conformity with the Reception Directive.

IV. Financing

In accordance with the Strategy, the provision of public services to the beneficiaries of international protection is financed from the budget of the relevant institutions, while the provision of additional services is financed by means of targeted budgets.

The National Strategy will have a separate budget which includes the following expenditures:

- Resettlement of the persons involved in the Program;
- Housing (rents and utility expenditures);
- Bulgarian language training;
- Health insurance;
- Awareness-raising campaigns;
- Translation, legalization and other administrative expenses.

The Strategy envisaged project-base financing (from the financing sources mentioned) of the municipalities that have declared their readiness to receive a certain number of beneficiaries of international protection.

At present⁵¹ the draft budget for 2015 is being discussed. However, as the National Plan and the estimates thereto have not yet been approved, most of the measures will not be included in the 2015 financial estimates, which has been confirmed by some of the state experts interviewed. This will contribute to additional delays and the risk of having yet another “year of zero integration”.

⁵¹ Early December 2014.

The process of drafting the 2015 Plan must start as soon as possible; lobbying is needed at the highest political level for reallocating among the ministries' budgets the funds for the financial provision of the new Plan. A decision of the Council of Ministers is required for that purpose.

In addition to the state budget, the Strategy can rely on the EU Asylum, Migration and Integration Fund (AMIF), the European Social Fund (ÅSF), and other EU supplementing funds, as well as financial resources provided by international institutions.

The funds for Bulgaria from AMIF in the amount of 10,006,777 euro and the national co-financing will add up to a total of approx. 13 mill. Euro. 20% of these funds have been allocated for integration, which is highly insufficient. According to the experts interviewed, Bulgaria is making efforts for updating the AMIF funds in order to ensure financing for more activities in the Integration Plan.

The next opportunity for renegotiation will be the mid-term review of the financial framework in 2017, which means that meanwhile the main source of financing remains the state budget. The experts interviewed highlight that this is the philosophy behind the EU funds, which complement the funds planned at the national level.

V. Conclusion

The Report has presented the challenges before the integration of beneficiaries of international protection which should be addressed by the stakeholder institutions at the central and local level in 2015. The purpose of the Report is to directly facilitate the process of developing the Integration Plan for 2015. The challenges identified are linked to the process of designing targeted specialized measures in support of initial integration and to the financing of these measures, as well as to the efficient coordination among all the responsible institutions. Ensuring the active participation of municipalities in the integration process at the local level is one of the key elements for the successful application of the new approach to the policies for the integration of refugee and humanitarian status holders, and for building administrative capacity not only at the central but also at the local level.