

REPORT

Monitoring Survey on the Implementation of the National Programme for Integration of Refugees in Bulgaria 2008-2010

The independent monitoring survey on the implementation performance of the National Programme for Integration of Refugees in Bulgaria 2008-2010 (the Programme) has been commissioned by the Representation of the UN High Commissioner for Refugees (UNHCR) in Bulgaria through the Bulgarian Council on Refugees and Migrants.

For the purposes of this survey, MONITORING (observation) shall mean the process of observing and influencing key activities in order to improve their performance. To be effective, monitoring has to inform about Programme's implementation performance, encountered problems and specific actions undertaken for solving them. Monitoring differs from evaluation.

Monitoring verifies whether the planning document, the Programme in this case, is moving in the preset direction towards achievement of expected results. Evaluation says whether this is the right direction. Monitoring is concerned with the activities implemented within the Programme and focuses on the short-range presentation of Programme's implementation performance.

Evaluation addresses the overall objectives and tasks of the programme as a whole and studies the long-range effects on the target groups. Monitoring is a continuing process whereas evaluation is a regular process. The regular monitoring of the Programme has to be a systematic process aiming to improve the performance of all integration process stakeholders and having regard to the interests and opinions of refugees.

The basic objectives of the independent monitoring survey are:

- To verify whether Programme's implementation progresses in the preset direction;
- To solve problems and not just to criticize as an end in itself;
- To learn lessons from our achievements and mistakes;
- To improve in a way corresponding to modern European and international immigrant integration standards the process of integration of foreigners with granted refugee or humanitarian status in Bulgaria.

The monitoring exercise included:

- Carrying out a qualitative survey with focus on target group needs;
- Identifying existing mechanisms of decision making, inter-institutional coordination and interaction with the non-governmental organizations and the target group;
- Identifying some practical achievements and some problems in the implementation of the Programme;

- Testing different survey tools for ongoing monitoring of Programme implementation, which could be applied later during the regular monitoring of the Programme by the stakeholders;
- Encouraging Programme's accountability, transparency, control and promotion;
- Formulating recommendations for improvement of Programme's implementation, with a focus on target group needs.

Why was independent monitoring of Programme's implementation undertaken?

Section X of the Programme provides for ensuring continuous monitoring and evaluation of objectives attainment. To date, the State Agency for Refugees at the Council of Ministers (SAR) has not conducted such regular and systematic process of monitoring of Programme's implementation. The task set for this survey was to collect qualitative information for the period May 2008 – November 2009 with a view to measuring Programme's implementation performance by applying a number of survey methods:

- **Documentary review** – identification of key Programme implementation documents and key integration process stakeholders by means of consultations, interviews and workshops, documentary analysis of quantitative and qualitative information about the situation of refugees in different spheres of social life, drafting indicative questionnaires for the implementation of the next survey phases;
- **Fieldwork to collect qualitative information** – meetings, consultations, workshops and interviews with representatives of Programme's target group, government and non-governmental stakeholders involved in programme's implementation; identifying problems, good practices, achievements and recommendations towards facilitating the integration of refugees in the Bulgarian society;
- **Aggregation and analysis of the information** – elaborating recommendations on the implementation of the refugee integration policy aimed at improving the integration process.

The documentary review of key documents was carried out with the kind assistance and support of SAR and its partners from the non-governmental sector. Identified were the following key documents regulating Programme's implementation:

- Data about the number of persons with refugee or humanitarian status residing in Bulgaria since 2008.
- National Programme for Integration of Refugees in the Republic of Bulgaria, 2008 - 2010.
- Internal Rules on the implementation of the National Programme for Integration of Refugees in the Republic of Bulgaria, 2008 - 2010, approved in May 2008 and November 2008.
- Financial estimates to provide for the integration measures for newly recognized refugees in 2008 and 2009.
- 2008 and 2009 reports of SAR's President on Programme's implementation.
- Surveys on the refugee integration process in Bulgaria.

Of the above documents, available in the Internet site of SAR is only the Programme but not the internal rules, reports and analyses on its implementation.

Recommended are urgent measures to improve transparency and accountability of Programme implementation

The necessary transparency and accountability are regulated in:

- Their part concerned with the protection against discrimination – Developing a specialized Internet site on the integration of refugees with information on all measures and options for their integration in the Republic of Bulgaria;

Article 2 of the Internal Rules approved in November 2008.

Fieldwork, which represented a significant part of the monitoring survey exercise, resulted in identification of problems and good practices, as well as of achievements and in making recommendations to facilitate the integration of refugees in the Bulgarian society.

Between May 2008 and September 2009, there were a number of meetings, discussions and consultations with:

- UNHCR's leadership in Bulgaria;
- Non-governmental organizations which are major partners of SAR in the implementation of the Programme, for example in discussing the questionnaires for the annual evaluation of the condition of refugees by UNHCR and regular consulting during the elaboration of the present report;
- Workshops and interviews with representatives of the Programme target group, including consultations to evaluate the integration measures included in the Programme (during a workshop in the Bulgarian Red Cross base in the village of Lozen in June 2009);
- Integration commission for implementation of the Programme – participation in a meeting of the commission in June 2009;
- Regular working meetings with representatives of SAR involving SAR's management, Integration Commission members, heads of units responsible for the implementation of individual sections of the Programme;
- Other institutions, which are parties in the implementation of the Programme, for example the Commission for Protection against Discrimination, concerning the lack of progress in the implementation of planned anti-discrimination measures, on a recommendation by refugees who took part in the above discussions;
- Migration Policy Group's research team conducting a survey for development of refugee integration evaluation tools – consultations on 9 and 10 June 2009 in Budapest.

What was observed during the survey?

As a first exercise of its kind, the survey covered major issues concerning the direct implementation of the Programme in the period April 2008 – November 2009. It

places special focus on the opinion and experience of target group representatives in their participation in integration measures planned in the Programme, as well as of others, who, for some reason or another, are not included in such ad hoc financing measures.

On the other hand, the preliminary survey task included identification of specific challenges and of refugees' experience in accessing integration services, the impact on their life in Bulgaria, in particular where such people have characteristics, which further aggravate their vulnerable position – sex, social status - single parents, mothers with children, health status and disabilities, religion or denomination, and age.

Questions put forward in the analysis of Programme's implementation:

- Approach for implementation of the refugee integration policy in Bulgaria;
- Decision-making and cooperation process: are all stakeholders involved in the process of Programme's planning, implementation, monitoring and evaluation?;
- Comparing planned activities and resources (technical, administrative and financial) against implemented activities and input resources:
 - Is the Programme progressing according to schedule?
 - What resources and tools have been used?
 - Benefits: do target groups still support Programme's measures and instruments for their integration?
- What are the results achieved and the benefits for the target group;
 - Problems: what corrective measures have been undertaken and what problems remain unresolved?
 - Are the satisfaction and the opinion of Programme's target group representatives regarding the integration process they are subject of being analyzed? What are their recommendations or evaluation?
 - What else needs to be done?
- Are there available accounting and analytical documents on Programme's implementation; method of elaboration, reporting and dissemination of accounting documents;
- Institutional mechanism and capacity for planning, management, implementation, monitoring, evaluation and accountancy.

Approach for implementation of the refugee integration policy in Bulgaria

As a successor to the National Refugee Integration Programme 2005 – 2007, this Programme offers a **comprehensive** approach for integration of the persons with granted refugee or humanitarian status in the Republic of Bulgaria.

The Programme outlines in a mid-term perspective:

- **target measures** ("specific" or "targeting" approach) in Section I, Integration measures for newly recognized refugees, aimed at putting in place conditions for the integration of such persons within up to 1 year after they are granted status,

by providing them with access to financial assistance for housing, social assistance, Bulgarian language training, social and cultural counselling

- **mainstreaming refugee integration issues in all relevant policies** („holistic” or „mainstreaming” approach) – in the other sections of the Programme on legislative measures, housing, employment, education, social assistance, healthcare, refugees with special needs, protection against discrimination. This approach concerns the implementation of a wide range of national policies and regulations targeted at all citizens of the country, or at solving the problems of a diverse group of people, including refugees, having similar problems, for example, vulnerable groups on the labour market that are in social or cultural isolation or persons subjected to unequal treatment.

The Republic of Bulgaria has developed and is implementing an effective refugee integration policy in line with the requirements of:

- the Hague Programme, by means of the above mainstreaming approach engaging stakeholders at all levels;
- the European approach for integration of third-country nationals, approved by the European Council with the Common basic principles for immigrant integration policy in the European Union, in particular Common Basic Principles 10 (CBP10) on mainstreaming integration issues in all relevant policies while developing targeted measures.

The mainstreaming integration approach lays down comprehensive measures for the integration of foreigners with granted refugee or humanitarian status in the Bulgarian society at all levels in a number of national regulatory, strategic and planning documents.

It remains a serious challenge for all stakeholders to set up an effective mechanism for inter-institutional coordination, cooperation, joint work and information exchange in the programming, implementation, monitoring, control and evaluation of the Programme.

Target groups and main stakeholders

The Programme aims to provide refugees with equal access to rights, to give them opportunity to reveal their personal potential and to encourage their efforts for active and equal participation in the economic, social and cultural life of the Bulgarian society.

The target groups of the Programme are foreigners with granted refugee or humanitarian status in the Republic of Bulgaria, with the exception of the specific target group of Section I, Integration measures for newly recognized refugees, which

covers every foreigner with granted status in the Republic of Bulgaria up to one year from granting.

As main stakeholders concerned with the implementation of the Programme have been designated responsible institutions in the central and local administration. Partners in the implementation of the Programme are the non-governmental organizations: Bulgarian Council on Refugees and Migrants, the Refugee-Migrant Service at the Bulgarian Red Cross, the Association for Integration of Refugees and Migrants, Caritas – Bulgaria, the Council of Refugee Women in Bulgaria.

In the interviews conducted during the monitoring exercise, the refugees expressed their willingness to participate actively in the democratic processes of the country as a way to improve their social integration in the Republic of Bulgaria, including participation in Programme implementation. Programme target group interests are not directly represented and protected in the annual planning of integration measures, in the decision-making mechanism and in the implementation, control and reporting of Programme implementation. With the exception of the Council of Refugee Women in Bulgaria, all partners from the non-governmental sector, mainly civil organizations working **for** and **with** refugees, are represented in the Integration Commission implementing the Programme.

There is a need of corrective measures for direct involvement of representatives of refugees and organizations thereof, including persons with special needs, in the development, implementation, monitoring and control of the integration policies. This recommendation is in accord with the Common basic principles for immigrant integration policy in the European Union, in particular with Common basic principles 9 (CBP9) stipulating that the participation of immigrants in the democratic process is essential to their successful integration.

The monitoring identified significant deviation from the preset target groups of the Programme as detailed in the Internal Rules on the implementation of the Programme of April 2008. The following newly approved conditions for participation in the programme limit further the access of newly recognized refugees to a number of integration measures:

- According to Article 10.4, the children between 7 and 16 years of age of the people covered by the Programme must regularly attend the Bulgarian language courses or continue their education in the Bulgarian schools and the children under 7 must regularly attend kindergarten.
- Eliminated are the specific measures, laid down in the Programme, for integration of refugees with special needs – chronically ill, people with disabilities, people with pending preparation of documents for expert medical commissions for determining reduced capacity for work, elderly people, etc.
- People with granted refugee or humanitarian status, who have stayed in the homes for children deprived of parental care, within 14 days after leaving the home because of coming of 18 years of age.

The identified narrowing of the circle of people who have access to the Programme as a result of the new internal rules approved with an order of the President of SAR No. 295/06.11.2008 is in conflict with the main refugee integration programming document – the Programme for Integration of Refugees in the Republic of Bulgaria 2008 – 2010, which provides that „Every foreigner in the Republic of Bulgaria, who has been granted refugee or humanitarian status, is entitled, up to one year from being granting such status, to access to financial assistance for housing, social assistance, health insurance, Bulgarian language training, social and cultural counselling”.

Special attention has to be devoted to the planning of integration measures for newly recognized refugees with special needs, which requires a profound analysis of their needs, collecting statistical information according based on different elements, attracting experts from other competent institutions in the discussion and coordination of the Programme with other basic strategic documents on the integration of people with special needs.

The interviews of refugees revealed that the main group of affected persons with limited access to Programme’s integration measures are children and young people, mothers with children, pregnant women, families where some members are not granted status, pensioners with chronic diseases and disabilities. In most cases, the question is obviously about financial barriers, such persons’ unawareness of their fundamental rights in different spheres of social life, as well as the requirements and conditions for inclusion in the Programme.

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Due to the administrative approval and implementation of restrictions on the access to integration measures for a wide group of newly recognized refugees, often without consultations with the non-governmental sector, a large number of the most vulnerable potential beneficiaries of the Programme do not get an opportunity to attend Bulgarian language courses and social and cultural counselling. This aggravates their social, cultural and economic isolation, hence, enhances the xenophobic attitudes in the host society.

There is an urgent need to review and discuss the approved changes mentioned above with the partner non-governmental organizations that are members of the Integration Commission as well as with representatives of the target groups and organizations thereof. There is a need to undertake a more flexible approach in order to respond in an adequate manner to the specific needs of the target groups and put the integration process on the track set out by the Programme.

Section I Integration measures for newly recognized refugees

The measures in Section I aim to put in place conditions for integration of newly recognized refugees for a period of 1 year from status granting.

The main partners of SAR with input in the implementation of the integration measures for newly recognized refugees under the Programme include:

- **Bulgarian Red Cross – Refugee-Migrant Service:** provides assistance and financial aid for finding and paying for homes
- **Caritas – Bulgaria:** provides in-kind assistance to refugees
- **Legal Protection of Refugees and Migrants Programme of the Bulgarian Helsinki Committee:** provides legal counselling, representation and attorney assistance, takes part in the development of the modern Bulgarian refugee and migrant policy
- **Association for Integration of Refugees and Migrants:** trains refugees in social counselling courses, developed the “Handbook on the rights and obligations of foreigners with granted refugee or humanitarian status in the Republic of Bulgaria”
- **Council of Refugee Women in Bulgaria:** provides social counselling and mediation for refugees’ interaction with institutions and NGOs
- **Bulgarian Council on Refugees and Migrants:** provides intercession, lobbying and fundraising for the protection, reception and integration of refugees in Bulgaria
- **UNHCR Representation in Bulgaria –** encourages the cooperation of different government and non-governmental organizations that are the main actors in the refugee integration process, initiates quality decision-making for persons seeking protection and legislative initiatives aimed to improve their integration. The government prepares on an annual basis the report “Being a Refugee” – a study by age, sex and belonging to social groups in all programmes in support of asylum seekers or humanitarian status applicants.

Unlike the other sections of the Programme, which fall under the so-called holistic refugee integration approach, the implementation of the integration measures for newly recognized refugees within Section I has been resourced with target financing as follows:

- For 2008, the target financing is BGN 300 000 for 100 refugees and 50 children from the budget of SAR.

- For 2009, the target financing is BGN 300 000 for 60 refugees and 30 children from the budget of SAR.

According to SAR, in 2008, 746 people applied for protection. Potential beneficiaries of Programme's Section I were foreigners with granted refugee (27 foreigners) and humanitarian (267 foreigners) status. Since May 2008 when the Programme was actually launched, 86 foreigners, including 18 women, have been interviewed and included in the programme. Refugees came mainly from the following countries of origin: Iraq, Afghanistan, Sudan, Lebanon, and Armenia¹.

Thirty-eight persons continue their participation in the Programme in 2009 because of being granted refugee status in mid-2008. According to SAR officials, some of the refugees did not accept the conditions of the Programme and refused to be included on account of the small amount of the financial assistance during training which does not guarantee them the minimum standard of living.

In its 2008 report and the 2009 Programme implementation analysis, SAR highlights the main problems of the integration of newly recognized refugees:

- Difficulties in the process of Bulgarian language training of refugees;
- Housing of foreigners with granted status;
- Small amount of the financial assistance for renting a home and paying utility charges;
- Lack of interest to participate in cultural and social counselling courses.

In 2009, 28 foreigners were excluded from the Programme for various reasons:

- leaving the country,
- irregular attendance of Bulgarian language courses,
- lack of motivation,
- need to start work, etc.

The point of view of the refugees who took part in the monitoring is that it would not have been possible for them to attend Bulgarian language courses without financial assistance from their relatives abroad.

To get financial support, newly recognized refugees are required to get included in Bulgarian language and social counselling courses.

The internal rules on the implementation of the Programme, approved on 6 November 2008, which repealed those approved in April 2008, abolish the flexible mechanism for elimination of this requirement in case of existence of objective reasons of age, health or social nature /vulnerable groups – people with disabilities, pregnant women, etc./ and planning of specific measures for the integration of refugees who are not able to satisfy this requirement.

The new amendments to the Internal Rules eliminate also the option for a refugee not to be subject to exclusion from the Programme in case Bulgarian language or social

¹ By comparison, in October 2007, 197 persons were included in the Programme /men – 81.5%/, mainly from the countries of origin Iraq, Iran, Afghanistan, Syria and Somalia.

counselling courses organized by SAR are unavailable in the settlement where the refugee has chosen to establish.

The above new points are in conflict with the Common basic principles for immigrant integration policy in the European Union, in particular with Common Basic Principles 4 (CBP4) stipulating that basic knowledge of host country's language is essential to successful integration. Many countries put emphasis in their integration strategies on introductory programmes, including (sometimes as a mandatory condition) language courses and civic counselling for new arrivals. An increasing number of Member States make these courses more flexible towards satisfying specific needs.

For many of the interviewed refugees SAR and the non-governmental organizations have contributed to a great extent to their social and cultural orientation in the first instants of their life in Bulgaria. Most of them highlight the significance of learning spoken Bulgarian as essential to their successful integration in the Bulgarian society. They view „**integration as a process of communication with Bulgarians and the Bulgarian institutions**”. Unfortunately, most of them do not register much progress in learning Bulgarian during the language courses in the Integration Centre of SAR, hence in the ability to achieve personal fulfilment in our country.

In this context, greater flexibility of the existing integration provisions is recommended, giving refugees a choice regarding the timeframe, place and intensity of provision of Bulgarian language training. It would be appropriate also, to think together with the target group about alternative language training methods, including work-based programmes combining language training with skills building, establishing contacts with local employers or with training providers, as well as decentralization of the language training provision by the Integration Centre.

Section II Legislative initiatives

The main objective of this section is to update and upgrade the legislation regulating the rights and obligations of refugees with a view to facilitating their integration in the Bulgarian society. The monitoring identifies progress in the implementation by SAR and the non-governmental organizations, which are partners in Programme's implementation, of the measures planned in this section.

An analysis of the legislation and practice of provision of social assistance and healthcare to foreigners with granted refugee or humanitarian status in Bulgaria was presented at a round table on “Implementation of the National Programme for Integration of Refugees and improving the legislation regulating the rights and obligations of refugees in the Republic of Bulgaria” on 24 – 25 November, 2008. Proposals for improvement of the Programme and the legislation on the rights of foreigners with granted refugee or humanitarian status have been elaborated and presented at a working meeting organized by SAR on 17.02.2009.

The Association for Integration of Refugees and Migrants took part in the design of a Handbook on the rights and obligations of foreigners with granted refugee or

humanitarian status in the Republic of Bulgaria, published by the UNHCR Representation in Bulgaria in 2008. In preparing the texts for the handbook, account has been taken of the opinions of SAR, the Ministry of Labour and Social Policy (MLSP), the Ministry of Interior, the Ministry of Foreign Affairs, the Ministry of Education and Science and the Council of Ministers Directorate for Religious Denominations.

The conclusions of the monitoring on the implementation of Section II recommend continued joint efforts of government institutions and non-governmental organizations towards updating and upgrading the legislation regulating the rights and obligations of refugees, on basis, however, of profound monitoring and assessment of its impact on the Programme target group.

Section III Housing

The access of foreigners with recognized refugee or humanitarian status to housing is regulated in the Municipal Property Law. A need to amend legislation has been discussed for years and accepted at expert level. Recently, at a round table on “Implementation of the National Programme for Integration of Refugees and improvement of the legislation regulating the rights and obligations of refugees in the Republic of Bulgaria” on 24 and 25 November 2008 were discussed improvements of the Ordinance on the terms and procedure of management and disposal of municipal housing on the territory of Stolichna Municipality and providing opportunities for accommodation of newly recognized refugees in housing from the municipal reserve fond.

In fact, most of the foreigners with granted protection are unable to procure alone a home where to live following the decision for granting of refugee or humanitarian status. This is depended by various interrelated reasons:

- absence of sufficient financial resources to rent a home – refugees do not have income, most of them do not have personal financial resources to cover the monthly rate or pay the charges for utility services. A serious barrier to renting a home is the advance payment of the rent for minimum six months required by property owners;
- lack of knowledge of Bulgarian language prevents refugees from looking for housing on their own, negotiating the conditions of or signing rent contracts;
- Art. 5 (2), first indent of the above ordinance lays down a requirement for at least one family member to be a Bulgarian national with address registration and permanent address on the territory of Stolichna Municipality for at least 10 years without a break;
- In some cases, there was discriminatory attitude and unwillingness of property owners to let to a foreigner with refugee or humanitarian status.

The Ministry of Regional Development and Public Works (MRDPW) is a lead institution for activity 3 of Section II of the Programme “Including refugees as a

vulnerable social group in the design of a “Programme for ensuring access to housing for low-income families” set out in the National Housing Strategy of the Republic of Bulgaria approved with Decision No. 395/14.05.2004 of the Council of Ministers. For the period covered by the monitoring survey, the ministry has not provided information on what has been done on the measures planned in the section concerned.

All these proposals highlight again the need to coordinate Programme measures and resources with other related strategic documents of the Republic of Bulgaria and the need of continuous dialogue, cooperation and joint work of institutions and non-governmental organizations in solving the housing problems of refugees.

On the other hand, notwithstanding the absence of statistical information and analysis of the housing conditions of refugees, MRDPW has made in writing the following proposals:

- Increase the time limit for leaving the Regional Registration and Reception Centre after being granted refugee or humanitarian status;
- Use the opportunities for accommodation in housing from the reserve fund of the municipalities;
- Update the amounts granted for rental payments;
- Ensure monthly support for newly recognized refugees from vulnerable groups within the meaning of Article 30a of the Law on Asylum and Refugees who, for reasons beyond their control, are unable to attend the compulsory Bulgarian language, social counselling and professional qualification courses.;
- Provide coordination with other programmes for disadvantaged people.

MRDPW proposes the following measures for improving the housing conditions of refugees:

- Securing in the Programme for ensuring equal access to housing for low-income families equal access and inclusion of refugees in the different normative procedures for accommodation in individual housing unit;
- Consider the opportunity to encourage individual municipalities to provide some of their own housing fund for accommodation of foreigners with granted refugee or humanitarian status. A portion of the Programme funds and the activities set out in the National Employment Action Plan could be channelled to the host municipality;
- Discuss the opportunity to develop projects for the set up of a revolving refugee-housing fund for accommodation of refugees for a specified period of time and under certain conditions – payment of a fixed-rate rent, carrying out construction or maintenance works, etc.

Section IV Employment

With the granting of status, refugees in the Republic of Bulgaria acquire the same labour rights as Bulgarian citizens.

In 2008, 29 foreigners with granted refugee or humanitarian status are registered in the Labour Office Directorates, including:

- With tertiary education – 4;
- With specialized secondary education – 3;
- With basic education – 22.

Of them 10 are women and 19 are men.

By nationality, registered refugees are from: Iraq – 14; Afghanistan – 3; Armenia, Iran and Nigeria – 2 each; Ethiopia, Cuba, Rwanda, Russia and Turkey – 1 each.

18 have started work, including 15 with the assistance of SAR. One refugee is included in an adult training course.

MLSP have not made proposals for amendments to the Programme and for inclusion of new specific measures for 2009.

The labour market problems highlighted by refugees with granted status include mainly:

- Communication problems and lack of knowledge of Bulgarian language;
- Lack of qualification, absence of documents for level of education or professional qualification;
- Lack of knowledge of the basic rights and obligations.

Employment is a key element of the integration process and the effective labour market integration of immigrants. The Common basic principles for immigrant integration policy in the European Union, in their part on the labour market integration of immigrants, remain a major challenge for the national integration policies concerning refugees. Recommended is the coordination and joint implementation of measures by SAR, MLSP, the non-governmental organizations for or of refugees, social partners and branch organizations, targeted at preventing the unemployment of refugees with granted status through educational and training activities, more effective qualification recognition systems, combating discrimination at the work place and encouraging the employment of refugee women.

Section V Education

Education and training provide opportunities to enhance the level of successful achievements and contribute significantly for the active involvement of refugees in social life. Therefore, the objective of this section of the Programme is to improve the access of refugees to the mainstream education system. For the monitored period, the main problems reported by SAR are concerned with the need to amend the existing ordinance on the right of access of asylum seeking children of foreigners to state and municipal schools.

The interviews of newly recognized refugees and members of their families highlight major difficulties with learning Bulgarian language, as well as a number of cases of impeded access of refugee children to school while they study Bulgarian language in the integration centre, including refusal to enrol them or enrolling them as audit students.

The Ministry of Education, Youth and Sports has not provided information to SAR on achieved results in the area of refugee integration and has not proposed amendments to improve the access of refugees to education. Information on the number of refugees enrolled in the Bulgarian education system or on the work of the joint commission of experts from the Inspectorate of Education, the Pedagogical Consultation Cabinet and SAR is not available.

There is a need not only of legislative amendments which take account of the specific problems of refugees and their children, but also of systematic monitoring of the difficulties refugees encounter in their integration in the education system, with a view to outline effective measures to overcome them. For the present, such monitoring of refugee integration measures in education remains a one-sided exercise carried out by SAR and its partners from the non-governmental sector without active intervention by the education system and without regard to the opinion of refugees.

Section VI Social assistance

Refugees in Bulgaria have the same access as Bulgarian citizens to social assistance and social services. Foreigners with refugee or humanitarian status, who are not included in the Programme but for health, age, social and other reasons beyond their control cannot support their basic living needs, are entitled to social assistance under the terms and procedure for Bulgarian nationals.

In 2008, the following assistance was provided in accordance with the existing legislation to foreign nationals with granted asylum and refugee or humanitarian status:

- Under the Social Assistance Act – 13 families;
- Under the Law on Family Benefits for Children – 73 children;
- Under the Law on Integration of People with Disabilities – 16 persons;
- Under Ordinance No. РД-07-5/16.05.2008 of MLSP on the terms and procedure of granting targeted heating allowance – 6 families.

In talks held during the monitoring exercise refugees with granted refugee or humanitarian status highlighted the valuable support provided by social mediators from the refugee community circles and the social counselling and consulting in the SAR Integration Centre.

Furthermore, the material situation of refugees in need in Bulgaria is supported by the Refugee-Migrant Service of BRC and by Caritas – Bulgaria funded by the Representation of the UN High Commissioner for Refugees in Bulgaria.

The monitoring of the programmes for social protection and social inclusion of refugees in Bulgaria reports zealous efforts and joint work of the government and

the non-governmental sector. Recommended is regular and systematic survey of the difficulties and problems which refugees, in particular vulnerable social groups or with special needs, encounter in their access to social assistance and social services, with a view to reducing unequal treatment and creating better conditions for encouraging equal opportunities in social life.

Section VII Healthcare

The overall objective of the section is to improve the access of refugees to health care through their inclusion in national health prophylaxis and prevention programmes, training seminars with general practitioners and dentists on specific refugee health problems and needs, inclusion of mediators with a view to facilitating their access to health services and providing health prophylaxis information. The access of refugees to the healthcare system in Bulgaria is regulated and is the same as for Bulgarian citizens. Refugees who are included in the Programme are health insured by SAR.

The National Health Insurance Fund does not pay for the treatment of health uninsured persons and persons with discontinued health insurance rights, including foreigners with granted refugee or humanitarian status, hence, such persons pay for the medical services. According to the Bulgarian legislation, there are certain medical services outside the scope of mandatory health insurance, which are provided free to citizens, including to foreigners with granted refugee or humanitarian status, regardless of their health insurance status. These medical services include emergency care, obstetric care, in-patient mental care, expert medical commission examination for level of disability and permanent inability to work.

The talks with newly recognized refugees and applicants for refugee status highlighted common problems of impeded access to health services, including emergency care, which result rather from unawareness about the basic rights and obligations of foreigners seeking protection and refugees, language problems and communication barriers, lack of knowledge of the Bulgarian healthcare system, lack of sufficiently informed medical personnel and poor knowledge of the specific health needs of refugees.

The monitoring survey recommends rethinking of the measure planned in the section which are aimed mainly at improving the access of refugees to healthcare by including them in national health prophylaxis and prevention programmes as well as provision of universal access to services for HIV/AIDS and tuberculosis diagnostics, treatment, care and support for all refugees in need, but not measures addressing specific health problems and needs of refugees. The survey encourages also the planning of wider involvement of non-governmental organizations in the activities for provision of health information and health services to vulnerable groups of foreigners seeking protection and refugees.

Section VIII Refugees with special needs

The monitoring survey of the integration measures aimed at facilitating the access of refugees with special needs to rights and services reports general non-fulfilment of planned activities. There is lack of detailed information and systematically collected data about foreigners with special needs seeking or granted protection.

As noted in the analysis of Section 1 on the integration of newly recognized refugees, the persons with special needs who are granted refugee or humanitarian status experience impeded access to rights and services in the Republic of Bulgaria – mainly in the field of healthcare, education and social assistance.

For the monitored period, SAR reports:

- Compliance with the commitments for organization of trainings for guardians, tutors and foster families for minor and underage refugees;
- Conducted trainings for representatives of the state administration and NGOs on actions for different categories of vulnerable foreigners – victims of gender-based violence, by the Representation of the UN High Commissioner for Refugees in Bulgaria;
- Organization in certain tertiary education institutions of systematic academic education on work with refugees with special needs for holders of bachelor and mater degrees in social pedagogy;
- Inclusion of refugees with special needs in different forms of psycho-social work, medical care, cultural activities;
- Provision in cooperation with NGOs and the Council of Refugee Women of social services and counselling to refugees with special needs: information about their rights, assistance before institutions, legal aid and assistance for solving their problems;
- Referral for assistance, counselling and psychological aid of refugees – victims of traffic, torture, physical and sexual violence.

SAR is in process of discussing and approving in cooperation with the main stakeholders of Rules on the integration of refugees with special needs who have been granted refugee or humanitarian status. There is a need to conduct in cooperation with the main stakeholders in the process, the refugees with special needs, the nongovernmental organizations and the competent government institutions a profound analysis of the existing situation of the refugees with special needs, of the difficulties and problems they encounter in the process of their integration in social life. The main groups of refugees with special needs and the scope of the necessary specific measures need to be identified in order to align scope one part with the national legislation on the matter and on the other part with the different special needs of the target group.

Section IX Protection against discrimination

SAR highlights in the section on the protection against discrimination of its Programme implementation report the good legislative regulation of the effective protection against all forms of discrimination of refugees, manifested in the Law and the Commission for Protection against Discrimination, the equal treatment and equal opportunities measures undertaken, including the right of refugees to free formation and expression of their religious beliefs.

The monitoring survey identifies progress in the implementation of media policy by SAR and its partners from the non-governmental sector, aimed at creating a favourable environment in the Bulgarian society, conducive of refugee integration.

On the other hand, major refugee integration problems in the field of protection against discrimination, highlighted by the refugees and by the non-governmental organizations, include:

- Manifestation of disapproval and hostile behaviour towards foreigners in public places
- Lack of coordinated efforts and joint work of government institutions and non-governmental organizations working for and with refugees in the field of combating the discrimination of refugees and encouraging tolerance to people of different races, ethnic groups and religious denominations.

Corrective measures were undertaken during the monitoring towards improvement of the joint work of institutions, non-governmental organizations and refugees with the Commission for Protection against Discrimination. Organized were a number of joint national and regional meetings, initiatives for encouraging the equal treatment and equal opportunities of third-country nationals, including refugees. A sociological survey of host society's attitudes to immigrants, including refugees, was conducted.

MBMD's survey "What comes of being a foreigner in Bulgaria?" was conducted under an assignment of the Commission for Protection against Discrimination, in cooperation with non-governmental organizations, which are Programme implementation partners of SAR. A sociological survey of attitudes was conducted among 1202 adult Bulgarian citizens and among 515 refugees, immigrants and other groups of foreigners residing in Bulgaria.

Eight percent of the interviewed foreigners are refugees, 20 percent are immigrants and 72 per cent are other groups of aliens. The survey indicates that in most cases the different attitude shows itself in communication problems because of a language barrier or distrust to foreigners. Different attitude is most strongly felt in the everyday contacts with people in the street, neighbours or officials in state institutions. Europeans enjoy good attitude in Bulgaria. More negative is the attitude to Arabs and Turks, state the authors of the survey, which outlines refugees as the most discriminated group of foreigners in Bulgaria.

The survey shows that factors for the negative attitude to foreigners in our country are country of origin, colour of the skin, knowledge of Bulgarian, language spoken by

the foreigner, material status, habits, customs, culture, way of life and education level.

The most frequent problems encountered by refugees and immigrants when looking for a job include poor knowledge of Bulgarian, non-recognition of their qualification, inability to produce documents for education and qualification, as well as age limits for qualification and requalification.

The children of 26 percent of the interviewed refugees, immigrants and other groups of foreigners attend school, of 7 per cent do not attend school and 46 per cent do not have children in school age. Twenty percent have not answered this question.

The most frequent reasons for which the children of refugees and immigrants do not attend school are lack of knowledge of Bulgarian language and lack of access to language training, lack of support by teachers and schoolmates in mastering the material and parents' fear of maltreatment and violence towards their children. The survey compares the attitude to refugees, immigrants and other groups of foreigners in Bulgaria and in other countries: 35 per cent of the interviewed foreigners state that in Bulgaria they feel less discriminated, 33 per cent do not see any difference, 10 per cent report that discrimination in Bulgaria is stronger, and 23 per cent have not answered this question.

Fifty-six per cent of the interviewed Bulgarians give positive answer to the question whether they would have a refugee, an immigrant or another group of foreigners as neighbours. Foreigners answer positively the same question for a Bulgarian as a neighbour. The percentage of "Yes" answers varies between 79 and 92 and increases with the increase of the length of stay of foreigners in our country.

A challenge for the implementation of the Programme remains the planning, encouraging and implementation of measures in support of initiatives for interaction between immigrants and the host society, including setting up of shared forums. This recommendation is in harmony with the main expectations of foreigners with granted refugee or humanitarian status in the Republic of Bulgaria, as well as with the Common basic principles for immigrant integration policy in the European Union (CBP7) on the importance of everyday contacts between immigrants and local communities and of the planning and implementation of such measures in the integration strategies of the individual countries.

Sector X: Monitoring and evaluation

A weak link in the implementation of the Programme is the section on its monitoring and evaluation. Effective Programme implementation requires ensuring of systematic and open monitoring and evaluation of Programme implementation. Recommended is to have regard to the opinion and recommendations of refugees when elaborating the annual reports on Programme implementation and to analyze the results of the measures for their integration by conducting questionnaire surveys and soliciting discussions and opinions from experts and NGOs.

Immigrant integration is a policy area where good coordination, cooperation and specific approach are essential. Immigrants need clear guidelines to show them their rights, obligations and the services to make use of in order to make their transition to new life easier. For that, an effective mechanism for coordination of actions at all levels is required and systematic monitoring and evaluation are an integral part of the process of integration of refugees in the Bulgarian society.

The mechanism of inter-institutional coordination, cooperation and control

Section X: Monitoring and evaluation of the Programme, provides for the set up of a Council on Refugee Integration in Bulgaria involving representatives of all government institutions and non-governmental organizations participating in the implementation of the programme. By the completion of this report, such institutional mechanism or platform for planning, management, implementation and reporting of Programme implementation has not been set up, perhaps due to considerations that the number of refugees is insignificant.

The Internal Rules on the implementation of integration measures in fulfilment of the 2008 – 2010 Programme designate SAR, through the agency president, as the responsible institution for the implementation of the Programme, and the Integration Centre – as the direct implementing institution. According to the Structural Rules in effect since 01.04.2008, as amended, State Gazette, No. 42 / 5 June 2009, SAR is a legal person funded from the state budget and the agency president is a second-level spending unit at the Minister of Interior.

This is a direct cause for the ineffective implementation and coordination by SAR of the mainstreaming refugee integration approach actions of government institutions at central and local level and non-governmental organizations working in different spheres of social life. The absence of such mechanism of coordination and joint work does not ensure full commitment of all stakeholders to the implementation, monitoring, collection, exchange of information and reporting of the measures planned in the Programme.

The financing of planned measures for integration of an indefinite number of persons outside the measures for integration of newly recognized refugees remains without a

specific financial dimension; they are planned within general financial sources – individual projects, national programmes, the approved budget of SAR, etc. This further impedes Programme control and reporting.

There is a need of further actions to control and evaluate the integration policies and programmes included in the Programme and to identify specific indicators for Programme's implementation performance. This recommendation is in line with the Common basic principles for immigrant integration policy in the European Union (CBP11) on enhancing the capacity of EU Member States to collect, analyze, and disseminate information about integration problems, including gender-based statistics, in a more systematized way. Information with greater level of detail and its open sharing among stakeholders helps to demonstrate in a clearer way the contribution of immigrants to the development of the host societies.

Fundamental conclusions

The Programme implementation analysis shows that in the section on the integration of newly recognized refugees planned activities are implemented, there has been input of specific resources and the initially expected results are achieved. The measures for integration of newly recognized refugees have supported these people in the difficult process of adapting to their new life in Bulgaria. This progress is a result of the coordinated efforts and joint work of government institutions and non-governmental organizations, regulated by the set up inter-institutional mechanism for decision-making, implementation and control and with a designated structure directly responsible for the implementation of the Programme – the Integration Centre of SAR.

Unlike Section 1 on the integration of newly recognized refugees, the other Programme sections falling under the so-called “holistic” refugee integration approach are not financed within the Programme but are planned instead against unspecified “active projects or initiatives of respective government institutions or non-governmental organizations”.

The present monitoring survey identifies absence of a comprehensive approach of inter-institutional coordination in the planning, procurement of resources and joint work in the implementation of the Programme. This in turn results in solving refugees' problems on an incidental basis, at low administrative level, on basis of already established personal contracts and good will of different stakeholders.

Recommended for future programming is to rethink the implementation, coordination, controlling, reporting and other extrinsic to SAR functions for a comprehensive and ambitious programme as the one monitored, which engages government institutions with different competences and powers.