

REPORT CARD 2011



ASSESSMENT OF THE
IMPLEMENTATION OF
STATE COMMITMENTS
TOWARDS

Bulgaria's Children



National Network for Children

Dear colleagues, friends and supporters,

At the end of every school year the Bulgarian children receive their school report cards in which their achievements for the year are described. The school report card accompanies children when they pass from one class to the next one, from one educational form to another. The official handing of the report card at the end of the school year is one of the moments which are expected with excitement from children as well as their parents. The memories from the graduation stand engraved in children and have an enormous impact upon the life of every child.

In 2011, we at the National Network for Children developed for the first time a "Report Card" with grades about how the agencies fulfilled their own commitments to children. This is the school report card of the adults who are responsible for children. As in school, it will be issued every year and will describe how they, the grown up and responsible representatives of the state cover their own standards regarding children.

The aim is to support politicians, the administration, the local authorities and all specialists working in the sphere of child welfare in the development and implementation of policies for children. In the life of the student, the report card is a measurement about school performance as well as a way for getting parents to know whether their children cope with the school material. This is also the objective of our report card – to give a clear and realistic picture about the direction of policies for children and whether we, the adults, fulfil our own promises listed in a number of strategic documents.

The process of scoring and rating always has a subjective moment but our idea was to give feedback about the accomplishments and the problems which we have in the policies' implementation. And as in school, some of our marks are encouraging and others – more critical. Without doubt, the areas with highest scores are related to the state policy about

deinstitutionalization, the efforts in child justice and the drafting of Children's Act. The lowest achievements are reported in the areas of children's health and especially regarding mental health following the educational policies.

We very much hope this first edition of the report card to put the beginning of one even more open and well-grounded dialogue among all stakeholders. We, at the National Children's Network, believe that the school report card will contribute to mobilizing the efforts of all of us and will lead to sustainable increase of our joint success for children.

We believe that the change in one child changes Bulgaria!



A handwritten signature in blue ink, appearing to read 'George Bogdanov'.

George Bogdanov,

Executive director,
National Network for Children

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Methodological notes*

The current "Report Card" is inspired from the practice of Children's Rights Alliance Ireland. On 24 January 2011 the Irish government received a D score (which is analogous to 3 in Bulgaria) in a report card called "Is the government keeping its promises to children?"**.

The main aim of the development of the school report card is to carry out annual, independent monitoring of children's rights based on the commitments on behalf of the government and supported by facts and data. In addition, through the report card we aim to suggest recommendations which to support the decision-making process of the state administration.

The first "Report Card" with scores of the implementation of state commitments to children in Bulgaria contains 5 areas (school subjects), 17 sub-areas and 43 commitments. When choosing the areas, we reviewed all national strategies, plans and programmes which concern policies or measures related to children. We chose commitments which were envisaged to be implemented in 2011 or in a longer period of time. We kept mainly to two criteria about priority of the problems – significance (spreading of the problem, urgency) and possibility for solving (availability of instruments, experience, resources, consensus).

In order to assess implementation correctly, we used facts and data provided by the respective agencies under the Act for Access to Public Information. The other sources are reports of institutions, independent researchers and non-governmental organizations as well as publications in the media. All data and sources of information are quoted in the text of the school report to support the conclusions and the assessments of the different commitments and to prove that the analysis is based on reliable sources and is not a subjective expression of NNC opinion.

Analysis include: brief description of the commitment; description of facts and data from the experts assessment and the answers of the state institutions about the respective commitment; recommendations for urgent actions (concrete steps and possible directions of work); concluding remarks about each subarea (which includes one or more commitments).

Six grades system is used similar to the assessment in the Bulgarian educational system. The interpretation of the grades could be seen in the report card, "Grades for 2011" part.

The original grades were put by the experts who developed the respective analytical parts and subsequently confirmed by the civil organizations, members of NNC. The final grades were consulted and validated with a group of external evaluation experts - people who work in the public interest and professionals with relevant experience and position on the concerned problems.

* The full text of the methodological notes could be seen at www.nmd.bg

** Is the government keeping its promises to children, Children's Rights Alliance, Ireland <http://www.childrensrights.ie/content/report-card-2011>

Grades for 2011

AREA	SUBAREA	GRADE	AVERAGE GRADE	
1. General principles of the UN Convention on the Rights of the Child	Non-discrimination	Poor 2	Average 3-	The draft Children's Act and some planned measures are success in the policies but the levels of poverty among families with children are still critical in the country. There isn't an independent body which to monitor and protect children's rights.
	Opinion of children	Average 3		
	Child poverty and welfare	Average 3+		
	Safe and healthy environment	Good 3.50		
2. Family environment and alternative care	Family care	Poor 2+	Average 3+	The deinstitutionalization policy is a success but activities are still at an early stage and the number of children in institutions remains high. The efforts for reconciliation of professional and personal life of working parents are a step forward however a minimal package of social services in support of families especially those who live in poverty is still missing.
	Children in institutions and deinstitutionalisation	Good 4		
	Adoption	Average 3		
3. Healthcare	Inpatient and outpatient care	Good 3.50	Average 3-	The 24 hours doctors on duty and the action plan of the health strategy for ethnical minorities are a progress but the health area remains critical. The access to health services is limited especially for children from risk groups, children's mental health is not a priority of the health system and the indicators for child mortality are far from UN targets.
	Mental health	Poor 2		
	Child mortality	Average 3		



AREA	SUBAREA	GRADE	AVERAGE GRADE	
4. Education	Early years education and care	Poor 2	Average 3-	The work on the new Act for Pre-school and School Education is a step forward however its approval is delayed and there are unclear consultations about the proposed texts. Early childcare standards are not implemented and the problems with the access and the quality of education remain acute especially for children with special educational needs (SEN).
	School education	Average 3-		
	Inclusive education	Average 2.5		
	Health and civic education	Average 3		
5. Special protection measures	Neglect and child abuse	Average 3+	Good 4-	The approved concept for reform of child justice and the ratification of the Lanzarote Convention are success. However, the old legislation which doesn't guarantee children's rights and doesn't provide child friendly justice is still valid in the country. The staff working in the system doesn't have special qualification, the hearing traumatizes children, the schools for children with deviant behaviour deprive from freedom for actions as homosexuality, running from school or home, alcohol.
	Child and juvenile justice	Good 4-		
	Street children	Good 4		

TOTAL GRADE 2011

AVERAGE 3

RATING SCALE

Excellent 6	there is significant, positive change in the lives of children
Very good 5	there are positive results for children
Good 4	satisfactory but insufficient development for children
Average 3	insufficient development, limited positive effect for children
Poor 2	unacceptable result, nothing has been done or the steps are in wrong direction

I.
General Principles
of the UN
Convention on the
Rights of the Child
(UNCRC)

Grade: Average 3-

8 commitments were reviewed and assessed within this chapter with the following subareas:

- Non-discrimination (poor 2);
- Children's opinion (average 3);
- Child poverty and welfare (average 3+);
- Safe and healthy environment (good 3.50).

One of the actions aimed at improving child welfare according to the *National Strategy for the Child 2008-2018*¹ is the creation of a specialised unit for **fighting child discrimination**. The NNC suggestions made at the working group for discussion of the new Children's Act are in the spirit of the United Nation's Committee on the Rights of the Child (CRC) for observing and protection of children's rights. NNC underlined the necessity for the creation of an independent body which to monitor children's rights. The main recommendation in this direction is to undertake concrete actions for setting up a children's ombudsman or a commission in line with the recommendations of the CRC. Such an independent body would support changing attitudes towards girls' and women's place in the family and society and guaranteeing the right of development and equality. Because "real, direct discrimination based on the gender exists in different social and ethnic groups in which girls are not equal. The problem is extremely serious as it leads to a big number of heavy consequences with regard to the health, level of education, economic dependency and the endless reproduction of the vicious model."² The first step towards solving this problem and minimizing its negative effects is getting to know its scale and essence.

The UNCRC gives **the right to children to express their views about matters which affect them**. This is also regulated in the Bulgarian *Child Protection Act*. At the end of 2011, there's still a lack of guidance about expression and taking into consideration children's opinion in decision-making processes. The initiative for a formal structure which to allow this in the capacity of the Children's Council at the State Agency for Child Protection (SACP) is welcome. However, it's another issue how authentic is the opinion of the children's representatives on topics

which are presented and discussed in a language inherent to experts and professionals in the sphere of children's policies. It is high time expression of children's opinion on issues which affect them to be legally regulated in Bulgaria – from the school self management to the national policies for children.

Child poverty in Bulgaria is with one of the highest levels and is often observed in a generational circle of separate families and communities³. The data clearly demonstrates the vulnerability of children with regard to poverty and the significant lagging behind of Bulgaria. The risk of poverty is especially higher for multiple families and households where no one is working. In the last four years the relative amount of the benefits provided under the Act for Family Benefits for Children has increased. However, in absolute value they remain extremely low (20 Euro per child monthly). The main recommendations about overcoming the heavy dimensions of poverty in Bulgaria are related to tax and fees for parents concessions, optimization of family benefits for children, provision of adequate and sufficient in terms of number services for education and care for children, linking benefits with social work, overcoming the housing issues and mainly building social housing for vulnerable families.

Despite the targeted policy for closure of institutions and the attempts for gate keeping, there's still a lack of effective **legislative framework, centred upon the child and the family**. As a response to all deficits in the policy for children and families, the government prepared a draft of a new Children's Act. The law tries to suggest a comprehensive approach to children's rights protection in Bulgaria and support to the family. The philosophy of the act is based on the rights approach – the child is a subject of rights, not only object of protection.

1. <http://www.strategy.bg/StrategicDocuments/View.aspx?lang=bg-BG&id=464>

2. D-r Tomova, Ilona, 2009, Madrid. Health and Roma community – analysis of the situation in Europe. Preliminary national report – Bulgaria, p.43

3. According to the data of the OECD (database about families), the level of child poverty in Bulgaria in the period 2005-2009 is 21.4%, the same indicator for the EU is 12,2 %, and for the countries from OECD – 12.8%.

The public attitudes and expectations are for the new act to cover the family support policy, deinstitutionalization of children, decentralization of services and child protection departments, effective administrative capacity and activities for child protection, sustainable development of services for children and families and unification of child welfare legislation. Whether the act will meet these expectations would be seen in 2012 when it's envisaged for the act to be introduced in the National Assembly.

Fighting child poverty and the activities for improvement of child welfare are inevitably connected with **social work**. Even if the legislative framework envisages adequate measures for reduction of child poverty and family support, their practical implementation would very much depend on the competence and the commitment of the people from the helping professions and the effectiveness of the Agency for Social Assistance (ASA). It's extremely necessary to approve a minimum common understanding about the essence of social work with children and its values which should be the basis for the standards development. The data about overload of the social workers⁴ without doubt

speaks about the urgent necessity of introduction of social work standards and increasing the capacity of the child protection departments in the country. Despite the start of a project for strengthening the capacity of the ASA, at the end of the year there still aren't social work standards – caseload and number of cases of a social worker. The social workers continue working in constant overload and acute shortage of all types of resources.

About one third from children's diseases could be explained with the lack of healthy living conditions such as the polluted water, air, food and soil. The provision of **healthy environment** requires multisectoral, interdisciplinary and holistic approach for limiting and prevention of health risk for children. At the same time, the concrete measures are specified in different areas and don't include key indicators such as places of living without sewerage and worsening indicators for children's health. It's necessary to develop a map with the most vulnerable groups of children according to geographic places of living and the factors of the environment defining the increased risk for the health of children.



4. 124 referrals to a social worker for 2010, 112 cases annually for 2008

II.

Family Environment
and Alternative
Care

3+

Grade: Average 3+

7 commitments were reviewed and assessed within this chapter with the following subareas:

- Family environment (poor 2+);
- Children in institutions and deinstitutionalisation (good 4);
- Adoption (average 3)

Formally there are requirements about practices for **prevention of abandonment at the maternity wards**. However there aren't procedures for informing the parents about a child with disability. Ministry of Health informs that there are introduced "Rules for organization and activities for prevention of abandonment" in all establishments which provide maternal support. On the other hand their reply on the concrete question about "standard procedures for informing about the diagnosis" is that these are yet to be developed. The recommendation in this direction is urgently to introduce procedures and practices for informing and support to parents which to eliminate the practice of talking parents into abandonment of their child. Such actions could be carried out by specialized teams on behalf of civil organizations but needs to be supported legally with the necessary material and financial recourses.

There's still a lack of understanding that the family in difficulty needs **integrated universal (public) services**⁵ and the specialists should be working with children and families giving the best quality depending on the possibilities and the needs of the concrete family. The idea about mobile teams providing field support at communities in remote places where there haven't been developed all the necessary services seems to be implemented in the distant future. The existence of some quality standards about services for children and families could be considered as a positive fact. The high levels of poverty among families and especially those with children (27% against 20% in families without children⁶) and the 7000 children placed in specialized institutions show without doubt the need of guaranteed by the state access of children and families at risk to a minimum range of services from the main sectors of public life. Such a package of guaranteed services hasn't been developed until

2011. It needs to be regulated legally and supported with a financial standard and methodological guidelines including not only social but also health, educational and other services.

As a whole, there's acceleration of measures related to **reconciliation of labour and family life**. However, there's still a lack of sufficient effective actions about improving the possibilities for parents of children with disabilities and parents with disabilities. A key factor for them is the network of support services – such as day care for families with children with disabilities. The situation of social services for children and families as a whole is also relevant for this sphere – namely poor and insufficient development.

The development of the commitments to children in institutions and the **deinstitutionalization** is still at an initial and rather planning stage. The number of children placed outside the family in specialized institutions remains high. The child protection departments as well as the social services providers who should implement the reintegration process of children can't work effectively due to high workload, turnover and lack of supporting and developing internally organized forms. It is very important to introduce urgently **integrated social work approach** in such an environment – both with children placed outside the family and with their families.

The envisaged regulation in the draft new Children's Act to restrict placement of children under 3 years old in institutions is a positive development. Another positive development is also the introduced during the year with the NGO efforts practice for placement of babies in foster care directly from the maternity ward as well as for adoption of a baby on behalf of a foster family.

5 Social, health, educational, transport, assistance with employment, etc.

6. OECD, family data base. http://www.oecd.org/document/4/0,3746,en_2649_34819_37836996_1_1_1_1,00.html

As a whole, the prevention of abandonment system is still not well developed in the country. **The alternatives to institutional care, based in the community**, exist only in few places and the quality of some services remains unsatisfactory. At this stage, it's not clear whether the projects for closure of pilot infant homes (DMSGD) would identify NGOs as providers of the new social-health services. Generally, in the preparation of deinstitutionalization projects and mechanisms funded by the European Social Fund, the European Fund for Regional Development and the World Bank, the state institutions put in a privileged position (as services providers) the municipalities in front of non-governmental organizations. The organizations from the civil society sector were excluded even from traditionally developed by them activities such as the foster care. This approach

leads to creation of tension and loss of valuable resources instead of joining forces at local level.

In practice the **adoption** process in Bulgaria continues being broken between different bodies about assessment of applicants, training, keeping registers, matching and decision-taking. There's obligatory preparation and training of adoptive applicants. However, there's a lack of specialized services for support of applicants and approved adoptive parents. The service providers are involved in the process in individual cases and mainly in training of applicants. The post-adoption support is more formal rather than committed and effective.



III. Healthcare

3-

Grade: Average 3-

8 commitments were reviewed and assessed within this chapter with the following subareas:

- Inpatient and outpatient care (good 3.50);
- Mental health (poor 2);
- Child mortality (average 3).

Despite the concrete commitments for improving **the access, the coverage and the quality of inpatient and outpatient care**, the situation in the country remains very worrying. There are still a huge number of children who are not covered by the health system (12% of the children up to 3 years old⁷), many women give birth without attending prophylactic checks during their pregnancy and the people from small places and remote regions can't rely on quality and timely medical aid.

A legal requirement for increasing the coverage of the health services through introduction of 24 hours on-duty offices for primary and specialized medical aid was approved during the year. However, in practice this regulation stays in the sphere of the good but unrealizable wishes for many families who don't have health insurances, don't have funds for additional services which are not covered by the National Health Insurance Office (NHIO) or there isn't a general practitioner (GP) in their place of living. The children, the pregnant women and the mothers from small towns and villages and the neighbourhoods with Roma population are in unprivileged position with regard to **prophylactic checks and immunizations**. The introduction of the measure for taking off the child benefits, in case the immunizations are not done, only deepens the heavy social situation of the uncovered groups whose children again remain outside the health system often for reasons which are beyond their control. The approved in the summer of 2011 Action plan for the *Health Strategy for People in Disadvantaged Situation* for the period 2011 – 2015 covers promising measures for reduction of child mortality, improvement of the health assistance for children and the prophylactic activities as well as improvement of the access to health services and the information for the Roma population. The implementation of the plan started just about in the second half of 2011 and is yet to be seen how effective the envisaged measures will be.

The *Bulgarian Policy of Mental Health 2004-2012* doesn't have even a single task related to children's mental health. The mental health is not a priority of the health system what about the children's mental health. Currently, there isn't a network of specialized services with care for mental health of children. There aren't programmes for mental health welfare as well as such for children with mental disorders. The activities for mental health promotion and prevention of drug abuse lack systemic approach. There aren't establishments and standards for treatment of children dependent on drugs. There aren't enough professionals prepared to carry out specialized treatment. The recommendations for dealing with the existing deficits are development of children's specialized establishment for treatment and counseling of psychic problems, development of standards for treatment of children who use drugs, introduction of programmes for promotion of mental health and preventative programmes for children with mental disorders and their families.

The **child mortality** indicators in Bulgaria are yet far from the envisaged by the *UN Millennium Development Goals* and the *National Strategy for the Child 2008-2018*. The expectations for development of these indicators are rather pessimistic given the current situation with the access to health and the coverage of the risk groups. The existence of the Action plan for the *Health Strategy for People in Disadvantaged Situation 2011 -2015* shows without doubt the commitment of the Ministry of Health to improve the health status of the risk groups. It's necessary to develop and approve urgently a national policy and strategy for protection of pregnancy, the health and lives of mothers and children which main principle should be securing equal access to timely, quality and highly specialized medical aid for all pregnant women, mothers and children irrespective of their social-economic status and ethnical origin.

7. According to data of the NHIO 88% of the children up to 3 years old are covered and monitored by a pediatrician/GP.

IV.
Education



Grade: Average 3-

12 commitments were reviewed and assessed within this chapter with the following subareas:

- Early years education and care (poor 2);
- School education (average 3-);
- Inclusive education (average 2.50);
- Health and civil education (average 3)

At the current moment, there aren't introduced standards for **early child development**. The *National Strategy for the Child* recognizes the need of introduction of such standards but there isn't a vision about the way they would be approved and who will they serve. At the same time, a draft of such standards was developed in 2009 by an interdisciplinary team initiated by UNICEF – Bulgaria and with the methodological guidelines of international consultants. It covers the age group 0-3 due to the existence of state educational requirements (SER) for children aged 3-7. The latter however are reached on the basis of participation in pre-school education and less than 20%⁸ of Roma children attend kindergarten. If we accept that the standards for early child development and education for the age group 3-7 will be defined by the SER, then it's possible to start the development of "integrated programmes for child development in different public spheres – health, education, social sphere, economics" for that group of vulnerable children. With regard to the standards for children from 0-3 we recommend the responsible state authorities to use the existing good practices in early child development in dialogue and consultations with the experienced organizations.

The access to education depends on the effective implementation and the co-ordination of the state policy in different sectors as well as on the clear responsibilities for inclusion of children in the educational system. Without optimization and clarification of responsibilities, the negative trends which are observed during the last years in the country will remain⁹. The lack of reliable data, which to allow researching the problem in detail, puts serious obstacles to increasing the coverage and the prevention of drop-out. At the same time,

the existing good practices, implemented within different project activities, are ignored and the developed resources are unsustainable or even lost.

The wide consultative process for reform in the educational legislation is without doubt a step forward to improvement of the education quality in the country. The explicit commitment for **integration of the key competences** in the school programmes will lead to the long waited modernization and better possibilities for practical implementation of the Bulgarian education. However the delay of preparation of the new legislative framework is worrying and the process at the end of 2011 was quite chaotic with the many working groups on the Act for Pre-school and School Education and the different standards. The draft act is envisaged to be presented officially for public discussion at the beginning of 2012.

Led by its willingness for change, the management of the Ministry of Education, Youth and Science put in the Concept for new Act for Pre-school and School Education a standard for **inclusive education** which is being developed by an expert group. The fact that there's an active dialogue between civil organizations, the state institutions, media and the whole society is a good start but the pace should be improved and the efforts more focused.

The inclusion of children with special educational needs remains rather in the area of the mechanic integration in kindergartens and schools without securing sufficient supportive environment and a flexible response to the individual needs of every child. The supportive environment is still understood mainly as securing physical access. It's a fact, though, that most of the schools in the country

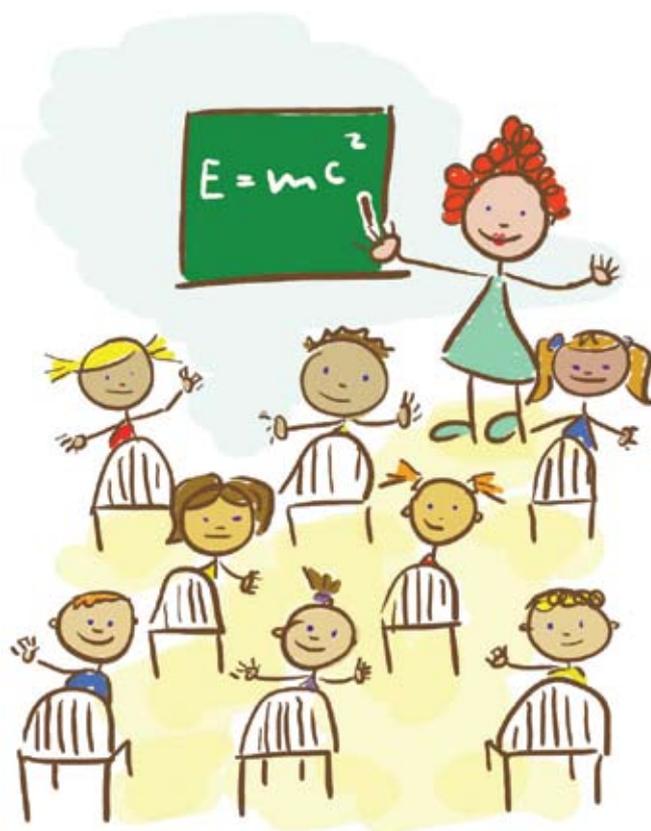
8. According to data provided by Health and Social Development foundation, member of NNC

9. Between 14 000 and 16 000 children drop-out from the educational system in Bulgaria annually. National statistical institute, "Education in Republic of Bulgaria 2011"

are inaccessible or “half –accessible” which means they have only a ramp at the main entrance but it’s not possible to move between floors or access other premises. Still, most of the classrooms in the Bulgarian schools are with inaccessible vision and organization of education. The children with more serious difficulties remain isolated and are often presented as an obstacle by the mainstream teachers who don’t know what to do with them. There aren’t sufficient resources and visual materials so that these students to be included in the educational process. Some progress could be seen in the system for resource support.

There are a wide number of approved and disseminated programmes and school aids in the sphere of the **civil education**. There are networks of

schools, teachers and NGOs who partner, exchange ideas and practices. At the same time, there aren’t clear rules on the basis of which to integrate the subjects of the civil education with the school programmes as well as with the specifics of the community in which the school is functioning. In this way, the civil education is still understood as a process of learning ready thesis, mainly in the context of the classroom, rather than as a process of active interaction and participation in building democratic school communities. In order to develop civil behaviour, children and young people should have time in which to experience and practice civil education, taking part in process in and outside schools with the active involvement of NGOs in this process.



V.
Measures for
Special Protection

4-

Grade: Good 4-

8 commitments were reviewed and assessed within this chapter with the following subareas:

- Neglect and child abuse (average 3+);
- Child and youth justice (good 4-);
- Street children (good 4).

In 2011 the Council of Ministers approved a reform **Concept for State Policy in the Sphere of Child Justice**. Unlike the current legislation, the concept is aimed to all children – victims, witnesses and perpetrators. Important topics such as the need of specialization and state professional standards for the professionals working with children in conflict with the law are included. The concept envisages specialized courts, specialized units in the prosecution office and the bodies for preliminary investigation which are very necessary without doubt. The concept also identifies the problems with the fragmentation of the current system and the lack of adequate statistical information. Another positive trend is the identification of NGOs as a partner of the state with potential for contribution to the national policy. At this stage, we expect that the philosophy of the concept, the envisaged aims and measures will remain as planned and will be put into effect in a concrete action plan with a time-schedule and responsible bodies and resources.

The sexual violations against children through computer schemes turns into more and more serious problem, which every child using the net could face. Some of the possible on-line violations against children are criminal acts in the Penal Code¹⁰. However, the Penal Code is still not put in line with the suggestion of the European Commission for a new directive of the European Parliament and the Council of the EU against sexual exploitation of children. In 2011 Bulgaria ratified the *Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse* from 2007 (Convention from Lanzarote). This serious positive step was reached following the initiative of NGO which with partnership of the SACP and UNICEF

carried out a series of round tables for prevention of sexual violation and undertaking actions for ratification on behalf of Bulgaria of the Lanzarote Convention. The National Network for Children was in contact with the person responsible for the Council of Europe programme about prevention of violence and sent a letter to the responsible state bodies following which a co-ordinator for Bulgaria was assigned.

The serious problems with **guaranteeing the rights of children in conflict with the law and children-participants in legal procedures** will remain until the aims and the measures of the Concept for reform of the child justice system in Bulgaria are not put into practice. There's still a serious problem with guaranteeing the rights of children and securing "child-friendly justice"¹¹. The number of interrogations of children in the whole judicial process is from 3 to 6 times per child¹², which traumatizes his/her psychic and at the same time doesn't provide reliable information for the justice aims. The procedure envisages hearing of the child – victim and witness in the presence of the accused which traumatizes the child and often leads to lack of justice as the child refuses to share the necessary information. The children are interrogated by officers who don't have specialized training neither preparation for interrogating children. There's some progress in the practice for hearing of children – victims or witnesses of crimes due to the trainings run by the National Justice Institute (NJI) with the co-operation of an NGO (Social Activities and Practices Institute) as well as the pilot projects of NGOs where children are heard in specially equipped rooms by specially prepared psychologists and social workers in the presence of a judge.

10. Apostolov, Georgi, Foundation „Applied research and communications“, member of NNC, The degree of risk for children in Internet depends on their behavior there, Focus agency, 27.11.2010 r.

11. Guidelines of the Committee of Ministers of the Council of Europe on child friendly justice (Adopted by the Committee of Ministers on 17 November 2010 at the 1098th meeting of the Ministers' Deputies).

12. www.sapibg.org, Assessment of the Social Activities and Practices Institute and the Judges' Union about practices for participation of children in legal procedures, 2008

Parts of the activities envisaged in the reform concept are planned in different projects of non-governmental organizations. In this sense, the representatives of the non-governmental sector expect the government and the judicial system to take advantage of the available good practices and to have the will for a real change.

The fact that there's still a lack of permanent alternative for **the children and young people living on the street** is worrying. Most popular and

often the only available alternative remains the placement in an institution.

The problem is still not resolved despite the positive trends for reduction of the number of street children reported by the state bodies during last years. The begging and street children are among us every day and the Bulgarian state hasn't made a single concrete commitment for finding a solution for these children and their families in the many national strategic documents.



Record¹³ about the implementation of the United Nations Convention on the Rights of the Child (UNCRC)

(Concluding recommendations from 6th June 2008 of the UNCRC)

THE COMMITTEE RECOMMENDS TO THE STATE	IMPLEMENTATION ASSESSMENT
Conduct a thorough analysis of the root causes of low achievement levels and drop-out of schools.	Remark! There still isn't such a thorough analysis.
Expand the integration of human rights and child rights education in the curriculum of all schools and shape learning and social life accordingly taking into account the Committee's General Comment No.1 "Aims of education".	Remark! Not done.
Establish a vocational education and training system for children, who wish to enter practical occupations, including for children who dropped out before graduating from primary or secondary education.	Remark! Not done.
Develop effective mechanisms for adequate implementation and review of all actions plans related to children and protection of their rights.	Partial progress ¹⁴ .
The Committee recommends to the State party that an independent monitoring agency be given the responsibility to monitor and promote children's rights and provide an accessible complaint mechanism for children and their representatives.	Remark! Not done.
Increase budget allocations for the implementation of the rights recognised in the Convention and especially for health, education and family support.	Remark! The funds in some areas are even cut especially in 2012 budget.
Pay special attention to vulnerable, marginalized and neglected children including children of Roma origin with the aim to reduce inequality.	Remark! There are even bigger inequalities. There isn't a focus on the problem.
Improve child protection system administrative capacity and the local authorities' structures with regard to planning and management of budget funds for the needs of children and families.	Remark! There's still a lack of progress in this area.
Strengthen the collaboration with civil society and widen the scope of cooperation so as to ensure cooperation on a broad level in all areas related to the promotion and protection of the rights of the child and throughout all stages of the implementation and monitoring of the UNCRC.	Remark! The resources and the possibilities for work of the local civic organizations have been limited.

13. Art. 138a. (New – state gazette, issue 51 from 2009 r.) Regulations for the Education act implementation: „...The record shows both the positive as well as negative sides of the student development (Government).”

14. The National Strategy for the Child 2008-2018 is being operationalised through annual plans which are reported annually. The progress of the action plan of the National strategy Vision for deinstitutionalization of children in Republic of Bulgaria is also reported in monitoring reports. However, there's still a lack of mechanism for implementation, review and reporting of the progress on all current plans aimed to protection of children's rights.

THE COMMITTEE RECOMMENDS TO THE STATE	IMPLEMENTATION ASSESSMENT
Promoting non-violent, positive, participatory methods of childrearing and education and reinforcing knowledge among children of their right to protection from all forms of corporal punishment; Bringing offenders before the competent administrative and judicial authorities.	Insignificant progress!
Increase support for families with children especially families living in poverty, looking after children with disabilities or lone parents.	Remark! No progress and poverty gets more and more deep.
Develop and financially support community-based and family-focused services for families at risk of social problems and families who care for children with developmental challenges, disabilities or health problems.	Insufficient progress! The savings from the reduced capacities of the homes are not reinvested in new services.
Continue its deinstitutionalization efforts while taking steps to provide appropriate alternative care for every child.	There's a serious progress but more serious work on project details is necessary.
Develop a comprehensive programme to improve mother and child health, including through basic health care services for the most vulnerable children, in particular, for Roma children and children living in rural areas.	Insignificant progress!
Closely collaborate with the minority communities and their respective leaders to elaborate effective measures to abolish traditional practices prejudicial to the health and well-being of children, such as early marriage.	Remark! No progress. There are even negative practices on behalf of the prosecution office in this area.
Develop a comprehensive mental health policy, including, mental health promotion, prevention of suicidal and violent behaviour, outpatient day care and inpatient services for adolescents with mental health problems, as well as programmes to support families with children at risk.	Remark! No progress. The mental health of children is one of the least developed health areas.
Take all necessary measures to make adequate housing, sanitation and infrastructure available for all families including for low-income and large families and Roma communities	Remark! No progress and the housing issue becomes even bigger factor for abandonment of children.
Take prompt measures to fully bring the system of juvenile justice in line with the Convention.	Insignificant progress!
Set up an adequate system of juvenile justice, including juvenile courts with specialized judges for children, throughout the country.	Remark! Lack of sufficient efforts in this direction.
Focus on strategies to prevent crimes in order to support children at risk at an early stage.	Remark! No progress.



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National Network for Children

The National Network for Children is a non-profit association comprising of 96 NGOs working with children and families. The mission of the National Network for Children is to strengthen and facilitate partnership between Bulgarian non-profit organizations and all other parties concerned in order to guarantee children's rights and well-being.

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