WHAT IS THE AVERAGE GOVERNMENT SCORE FOR CHILDCARE?
REPORT CARD 2019
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Dear Partners, Colleagues and Fellows

For the eighth time this year it is my pleasure to present the annual report of the National Network for Children Report Card 2019: What is the Average Government Score for Childcare. The report was prepared by experts from civil society organisations, whose daily activities are in the field and involve direct work with children and families throughout the country.

Just like the two previous reports, this year’s issue includes the views of hundreds of children, young people, parents and professionals. As always, our goal has been to gain a clear understanding of the state of play of children’s rights in Bulgaria as seen by children, their parents and the people who support them – teachers, health and social workers, etc. Thus, along with the expert presentation of the situation, we have also shown their perceptions, attitudes and expectations.

Without any claim to representation and exhaustiveness, in late 2018 and early 2019 a total of 461 children and adults were approached to share facts and opinions about their lives, more specifically about their health, education, justice and family situation. This year both reports - the first one including the experts’ evaluations and the second one with opinions of children, parents and professionals – have been included in one common publication, which you have in your hands. In addition, the report includes genuine information based on children’s opinions collected by child reporters of the National Eurochild Forum in Bulgaria and child members of the Megaphone youth network.

We have further opted for a new approach to presenting the progress in child policies and ensuring children’s rights drafted in eight subject areas: Child Welfare, Protection from All Forms of Violence, Early Childhood Development, Child Health, Education, Family Environment and Alternative Care, Justice for Children, and Child Participation. Through the chosen subject areas and sub-areas we have aimed to ensure a comprehensive overview of children’s rights and to evaluate all aspects of child welfare.

Overall, Report Card 2019 marks some slight improvement over the previous years, which is also reflected in the higher total grade presented in it. The important political events that shaped the course of the year and the commitments made by the government and institutions generated mixed responses in the general public, but, generally, this year’s grade of Average 3.31 – the arithmetic mean of the grades given by the authors, the external evaluators and the children, parents and professionals – has been the most favourable assessment of all eight issues of the report. In this way, we have aimed to provide an even more realistic evaluation of the efforts made by the government to guarantee children’s rights. For the most part, changes were made under pressure coming from parent organisations and civil society alliances. Consequently, we have identified ensuring the rights of children with disabilities as this year’s highlight, which is presented as a stand-alone section to the current publication.

Bulgaria continues to design policies and initiate regulatory changes that are not based on evidence but on clear party goals, without any clean vision, political will and professionalism on the part of government institutions. A definite shortcoming is the lack of data collection and processing and of unified methods for collection and analysis of information on child policies. In addition to which, there is no capacity at state level to analyse the data collected in the policy management process.

A further focus of the analysis in Report Card 2019 is the evaluation of municipalities’ implementation of national policies and their role in protecting children’s rights. This is very clearly reflected in the way in which children’s leisure time is managed, child participation is ensured, social services are developed, and availability of sufficient and high-quality educational institutions for children from an early age is provided.

This year saw some further confirmation, even deepening, of targeted propaganda against civil organisations. The non-interference on behalf of the state or, on the contrary, the active involvement of some of its representatives or party headquarters in campaign rallies spreading disinformation and provoking clashes between different social circles pose a serious risk to our development as a democratic and free society.

In conclusion, I would like to thank all contributors to Report Card 2019 – authors, member organisations of the National Network for Children, external evaluators, all children, parents and professionals, our programme coordinators, who were involved in the preparation of the report, as well as the experts from different government institutions, who provided information in the relevant areas and sub-areas. We strongly believe that the efforts made by the National Network for Children will contribute to improving and ensuring children’s rights so we could all live happily in a safer and more prosperous country!
ACKNOWLEDGEMENTS

The National Network for Children would like to thank all contributors to Report Card 2019: What is the Average Government Score for Childcare. We are grateful to the authors of the different parts, and we appreciate the support of our member organisations and the efforts and diligence of our colleagues who offered valuable comments and revised the different sections of the report.

We cannot omit to thank the young people, parents and professionals from all over the country who took the time and made the effort to share their views and opinions about the problems faced by children in Bulgaria and the ways in which they should be addressed. A total of 461 people took part in focus groups or completed survey questionnaires. We would especially like to thank the organisations that made this possible and thus made this valuable contribution to the current text that is Report Card 2019: How Children, Parents and Professionals Evaluate the Government. The following organisations conducted 31 focus groups across the country:

Future for Children Association - Kazanlak
Ekaterina Karavelova Women’s Association
Janeta Association – Razgrad
Life with Down Syndrome Foundation
Hope for a Good Future Association - Silistra
Health and Social Development Foundation
Association Initiative for Development – Kardzhali Decides
Karin Dom Foundation
Club of NGOs - Targovishte
Youth Tolerance Association
Our Premature Children Foundation
Single Step Foundation together with Love Guide
Sauchastie Association - Varna

We are further grateful to the regional coordinators of the National Network for Children, both for their efforts to organise and conduct the focus groups and for encouraging the involvement of all participants.

We especially value the efforts made by the officials of the Ministry of Labour and Social Policy, Ministry of Education and Science, Ministry of Health, Ministry of Justice, Ministry of Interior, Ministry of Regional Development and Public Works, Ministry of Youth and Sports, Agency for Social Assistance, State Agency for Child Protection (SACP), and State Agency for Refugees, who provided detailed information on the implementation of child policies and ensuring children’s rights, and prepared responses to numerous requests for access to public information for the purposes of the Report Card.

Last but not least, we are exceptionally grateful to the members of the external evaluation committee, who did not spare the time nor the effort and expertise to provide comments on the report and contributions to the analysis and recommendations.

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Report Card 2019: What is the Average Government Score for Childcare is the eighth issue of the annual report prepared by the National Network for Children. It assesses the accomplishment of children's rights in the course of 2018 as reflected in the implemented government’s policies on the child and the family.

The main goal we set for the Report Card was to ensure annual and independent evidence-based monitoring of the work of the government in the field of children's rights. The report further offers recommendations, which we hope will support the improvement of child and family practices and policies in Bulgaria.

This year we have opted for a new approach to presenting the progress in child policies and ensuring children's rights in eight subject areas: Child Welfare, Protection from All Forms of Violence, Early Childhood Development, Child Health, Education, Family Environment and Alternative Care, Justice for Children, and Child Participation. Through the chosen subject areas and sub-areas we have aimed to ensure a comprehensive overview of children's rights and to evaluate all aspects of the relevant right and its implementation. The purpose of the analyses is to ensure cohesion in the report’s presentation of children’s rights, which focuses on structural and horizontal policies rather than on specific government commitments in the respective year. We have mainly adhered to three priority criteria: significance, relevance to issues prioritised by the member organisations of the National Network for Children, and resolution potential.

Our choice of subject areas and sub-areas for Report Card 2019 is based on the principles of consistency, scope maximisation and topical relevance. On the one hand, these have enabled us to dynamically monitor the government’s management approach to certain challenges and verify whether the action taken to rectify the identified problems is consistent with the recommendations made the year before; on the other, they have allowed us to identify a concrete subject area in the current issue that is both pivotal and exemplary of the state of play of ensuring children’s right in Bulgaria. Consequently, we have identified ensuring the rights of children with disabilities as this year’s highlight.

The analyses include evaluation, justification and description of the facts and data generated by the expert review and the information provided by government institutions on the subject area in question, as well as recommendations (concrete steps and possible lines of action).

In the interest of fairness, the preparation of the Report Card traditionally relies on facts and data provided by government institutions in accordance with the Access to Public Information Act. Aiming for even greater transparency and impartiality in the evaluation process, we approach experts from ministries and agencies to solicit their assistance in collecting information on the progress made in the subject areas and sub-areas we identified in 2018, as well as on the challenges faced along the way, and the plans to achieve the targets set. We then use this detailed information to prepare the analysis for each subject area. Other traditional sources include: institutional reports, independent research and NGO papers, and media publications. As the preparation of the current issue took place in 2018 and early 2019, all reported data refer to 2017 and 2018. When data could not be accessed, we have used the most recent available information on the general state of play and the status quo of the policy. All data and information sources have been referenced in the report to back up the conclusions and grades in the relevant subject area, as well as to ensure that the analysis is based on reliable sources rather than the subjective opinions of the National Network for Children.

For the third time this year we have included the views of hundreds of children, young people, parents and professionals; however, this time everything has been incorporated in a single report, together with the expert assessments. Our goal, as in any of the previous years, has been to gain important insights into children's rights in Bulgaria, based on their opinions, as well as those of their parents and the people who support them – teachers, health and social workers etc. Without any claim to representation and exhaustiveness, in late 2018 and early 2019 a total of 461 children and adults were approached to share facts and opinions about their lives, more specifically about their health, education, contact with the justice system and family situation. In addition to this, the report includes genuine information based on children's opinions collected by child reporters of the National Eurochild Forum in Bulgaria and children from the Megaphone network.
Our task has been to examine the state of play and possible changes surrounding the enforcement of children’s rights and child and family policies as evidenced by the decision making and the relevant actions taken by the government towards permanent elimination of the problem and ensuring a positive impact on children and families. We also remembered to praise the efforts made and the positive developments achieved, even in the absence of concrete results or incomplete policy implementation. We made a conscious effort to highlight achievements and identify positive developments in ensuring children’s rights, however without sparing any constructive criticism where such has been due.

The section *What We Can Learn from the Grades* includes a brief overview of the developments made in each subject area over the past year.

The assessment is comparable to that in the education system, and is based on a six-grade scale. The grades presented in the report were initially given by the experts and external evaluators involved, as well as by the children, parents and professionals, and were subsequently verified by the civil organisations members of the National Network for Children. The final grades are based on arithmetic averages of the grades given by the authors, the external evaluators and the children, parents and professionals in the sub-areas included in the eight subject areas of the report.

It is important to note that we have kept to the assessment scale adopted in 2015. This means that the grades represent a reflection of the definition of the problems, i.e. the state of play at national level concerning the enforcement of children’s rights and child and family policies, as well as the decision making and the relevant actions taken by the government towards the permanent elimination of the problem and ensuring a positive impact on children and families.

The English version of *Report Card 2019* presents a summary of the original texts included in each subject area.
## GRADES, REPORT CARD 2019

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### AVERAGE GRADE, REPORT CARD 2019

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WHAT WE CAN LEARN FROM THE GRADES

1. CHILD WELFARE
The grade in this subject area is Average 3.00.
High poverty and inequality rates continue to pose serious threats, whose impact on children remains particularly worrying. This affects all aspects of their lives, including by limiting sports practices and leisure opportunities, which further reduces their chances of social inclusion.
There is a need for targeted efforts to overcome the systematic and lasting social exclusion of children, as well as a rationalised and integrated approach to support parents. The Social Services Act and the National Strategy for the Child 2019-2030, developed in 2018, offer some hope in this direction; however, the extent and the manner of their practical application are yet to be seen.

2. PROTECTION OF CHILDREN FROM ALL FORMS OF VIOLENCE
The grade in this subject area is Average 3.00.
Despite the progress made in the protection of children from all forms of violence in 2018, such as the adopted amendments to the Criminal Code concerning the criminalisation of domestic violence and the efforts to change the Coordination Mechanism for cooperation on cases of child victims of violence or children at risk of violence and for cooperation in crisis interventions, there is still no unified, multidisciplinary and coordinated policy to combat violence against children. There is further no unified statistical data to inform policies and measures. Current data indicate an increase in the number of child victims of crime and aggression in schools.

3. EARLY CHILDHOOD DEVELOPMENT
The grade in this subject area is Good 3.50.
This is the highest grade in the last two issues of the Report Card, resulting from the recognised importance of the issue and its prioritisation by Bulgarian government institutions. Despite the intentions and efforts made, however, the provision of universal and integrated services for early childhood development in Bulgaria is still insufficient. Action has been taken to develop a National Strategy for Early Childhood Development, which is expected to address current problems. Such exist in all systems relevant to promotion of early childhood development - healthcare, education and the social system. Identified challenges include: lack of cooperation and coordination between different systems, lack of a family-oriented approach and parent support, lack of leisure time and cultural activities policies for children, and lack of adequate policies and measures for children with disabilities and developmental delays.

4. CHILD HEALTH
The grade in this subject area is Good 3.50.
For the most part, this is a reflection of the achieved reductions in infant mortality and attainment of the set targets. The reported value in 2017 was 6.4 deaths of children under 1 year of age per 1,000 live births, which is still high compared to the EU average (3.69‰ for 2016). The existence of very high infant mortality rates in some parts of the country raises serious concerns, but no targeted measures have been taken to improve the situation.
Despite the adoption of certain measures, there is still a clear need for joint efforts and focused attention to pressing issues, as well as for implementation of an overarching approach to children's health needs, including: building a national children's hospital providing comprehensive treatment and rehabilitation to children; initiation of concrete care provisions for the mental health of children and young people; streamlined attention to the retention of health professionals working with children; targeted efforts to promote healthy nutrition and behaviour in children.
5. EDUCATION

The grade in this subject area is Good 4.00.

This achievement can be explained by the categorical prioritisation of education by the government in recent years and the wide public discussion of the subject. Still, however, progress in education stands out mostly in comparison with social issues, rather than as measured through the impacts of sustainable long-term policies and profound structural changes.

The efforts of the government with regards to the coverage of all children in compulsory schooling and the significant raise of teachers’ salaries are on the right track, but unless backed up by lasting reforms, their impact will only be short-term. Social work with families and support for returning or first-time students is still not implemented in full. While good practices and new opportunities to attract young teachers and retrain professionals are increasing, the sustainability of such initiatives is yet to be analysed.

Inclusive education still suffers from a lack of recognition of the inclusion model as well as the need for it by all teachers, directors and parents. There are no full funding provisions, sufficient facilities, methodological resources and specialists to work with children. Inclusion in kindergartens is also very sporadic and mostly implemented in big cities. Many children with disabilities stay out of school due to a lack of adequate physical access provisions.

6. FAMILY ENVIRONMENT AND ALTERNATIVE CARE

The grade in this subject area is Good 3.50.

The closure of specialised institutions for children continued, and in 2018 the placement of children under three-year old without disabilities in homes for medical and social care for children was officially suspended. Two important bills were actively developed in the course of the year – one on social services and one on people with disabilities. Some regulatory changes were made to expand and develop community-based social services.

At the same time, the number of children living in separation from their birth families has remained relatively unchanged over the years. Despite the increased interest in the issue, no concrete measures have been taken to improve the quality of life of children in Family-Type Placement Centres. There has been no progress in foster care, adoption, and the protection and integration of refugee children.

7. JUSTICE FOR CHILDREN

The grade in this subject area is Average 2.50.

This is the lowest grade ever given in this subject area since the first issue of the report. In 2018 there was no progress in the implementation of the justice for children reform, despite numerous declarations of political will to the contrary on the part of the Ministry of Justice.

In spite of the increasing number of facilities for hearing of children in Bulgaria year-on-year, this has not led to any real positive changes in the situation of child victims of violence or crime. Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime continues to be only partially incorporated into the national legislation. There is generally no acknowledgement of the need to adapt legal procedures to the children involved in them so as to ensure their rights.

8. CHILD PARTICIPATION

The grade in this subject area is Good 3.50.

For yet another year we have seen stagnation in child participation, coupled with a collectivist and rather institutionalised approach. Even in the case of structures like councils and parliaments, opinions are not sought systematically and children have limited control over the kind of issues they can be consulted on, while feedback is rarely given. A major and
lasting obstacle is the fact that children are generally not kept informed of the decisions taken or due to be taken at national, regional and municipal level that affect them.

There is a need for mechanisms and procedures to be put in place in different sectors to take account of children’s views during their contacts with institutions and professionals in their everyday life. Education and schools in particular already have built-in practices, and social services, albeit mostly as a result of NGOs’ efforts, are also on the right track, but there is still a lot to be done in the areas of justice for children and healthcare.

Last but not least, there is still a lack of a systematic approach to training delivery to professionals working with children and public officers not just in terms of the specific right of children to opinion but also about their universal rights (considering that child participation outside an overarching child-rights-based approach can hardly be expected to achieve its goal).
The years-long delay in reforming policies for children and people with disabilities, as well as the sense of lack of support from the government motivated parents (mostly mothers) of children with disabilities to organise tent protests in front of the parliament building in Sofia, as well as in front of the buildings of local government in a number of Bulgarian cities. Their requests were for effective application of the Convention on the Rights of Persons with Disabilities, individual assessment of the needs of each child or adult, and guaranteed provision of personal assistance. In what followed, we heard unacceptable words and hate speech from top political officials, legitimising discrimination against the families of children and young people with disabilities.

In 2018, three new laws directly addressing children with disabilities were under preparation - People with Disabilities Act, Social Services Act and Personal Assistance Act. The government made assurances for a new human-rights-based approach encompassing the principles of the UN Convention on the Rights of Persons with Disabilities. Along with those legal initiatives, there were also hopes for changes to the assessment method of disabilities and needs, replacing the current medical approach and territorial expert medical panels (TEMP).

As regards the expert commissions, the intentions for large-scale changes in 2018 also failed to deliver. The only change made concerned the methodology for assessment of the degree of disability, which currently requires only one diagnosis and does not consider any additional ones. This has proven to be disadvantageous to children with a lesser disability degree and has put a further financial burden on the families of hundreds of children having to cover extra costs arising from the disability.

Until the end of 2019 medical equipment and aids will be provided by the Ministry of Labour and Social Policy. Their list contains a limited variety of equipment, while there are diagnoses and conditions for which no provisions have been made. The funding procedure is cumbersome and often involves multiple visits to various specialists, social services and suppliers’ offices. Funding limits are well below average market prices, often entailing substantial copayment by the family. Meanwhile, in June 2018 the aids list was updated for the first time in 10 years. New additions included wheelchair for children and standing frame for children, but the stipulated limits are still insufficient. At the same time, children do not have access to aids unless the latter are included in the list and specifically labelled as paediatric, even in cases where they are absolutely necessary. The People with Disabilities Act provides for redirecting access management to medical equipment and aids to the Ministry of Health, aiming for a needs-based provision, which is a good step towards reducing discrimination.

Serious problems are also faced by children suffering from rare diseases and severe conditions requiring medical foods and supplements. In Bulgaria reimbursement for some medicinal foods from the National Health Insurance Fund or from the Centre Fund for Treatment of Children is only done in the case of patients with certain rare (congenital metabolic) diseases. The access to such foods for children suffering from malnutrition and cachexia as a result of various other diseases, anorexia, Crohn’s disease and ulcerative colitis, congenital metabolic diseases, cystic fibrosis, Wolf-Hirschhorn syndrome, severe cerebral palsy etc. is difficult and expenses are generally borne by their families. As these can be impossible to afford, most of them are constantly raising funds through donor campaigns.

Modern treatment, on which children with certain rare diseases rely, also remains outside the reach of Bulgarian children. One example is the spinal muscular atrophy (SMA) disease, for which the medication treatment is widespread in Europe, hasn’t been yet introduced in Bulgaria. Because of this, families are forced to travel for treatment, and costs increase substantially.

We are witnessing an already growing tendency for the families of children with disabilities to emigrate for health reasons. Many completely relocate to other European countries to secure better treatment and support provision for their children, as well as due to the simplified systems for social and educational support.

Despite the successful implementation of the deinstitutionalisation process, the last children who remained in specialised institutions are mainly children with disabilities. For them deinstitutionalisation has meant transfer to residential-type of care, instead of reintegration, adoption or foster care. It is mainly because of such children that 15 homes for medical and social care for children are still open. The total number of children in these institutions is 440 (as of 30 November 2018), of whom as of 30 June 2018, 416 were children with disabilities. The age distribution is as follows: 268 children aged 0-3; 117 children aged 3-6/7; 54 children aged 7-15; and 1 child aged 16-18/20.

To reduce the likelihood of a child with disabilities enter-
ing an institution, parents must feel confident that they will receive support as early as the disability is discovered. Services should be first made available in health facilities, including psychological support and information and training for parents on child care, time to build relationship, and active support for the care for children with disabilities at home. To be effective, such support needs to be comprehensive and provided in a timely manner.

The response timeframe specified in the Ordinance on the Terms and Procedure for Implementation of Measures to Prevent Child Abandonment and Placement in Institutions and for Their Reintegration, including in cases of children with disabilities, is 7 days, which is often too long for provision of appropriate support. To minimise alarming statistics, the Ministry of Labour and Social Policy has proposed amendments to the Ordinance aiming to prevent abandonment. These include higher one-off benefit payments to families and shorter response timeframes – within 24 hours for social services intervention in the case of abandonment of a child in maternity wards.

According to the SACP Register of Licenses issued to service providers, the total of number of services for children provided in Bulgaria is 348. Service distribution is uneven and is concentrated in big cities. Moreover, there are municipalities without a single service for children with disabilities opened. Another access-related problem is the poor awareness of parents, as well as the varied quality of services provided.

Accessible environment is essential for children with disabilities, as it is a major contributing factor to physical and mental independence. In many cases an adapted architectural environment can completely replace the need for a personal assistant in the school or kindergarten, resulting in reduced public expenditure for such assistants. Playgrounds for children with disabilities are only a few in the big cities and have usually been built by donors, rather than state institutions.

There is still no detailed and practically useful statistics on children with disabilities and chronic diseases. In spite of the implemented projects and the commitments made in public, neither the Register of the Agency for People with Disabilities, nor those of the Territorial Expert Medical Panels, the National Expert Medical Panel, or the Agency for Social Assistance, nor even that of the National Statistical Institute, are able to provide up-to-date information on the number of children with disabilities in the country and the type of needs they have.

Without such database, no targeted and effective policies for children with disabilities can be expected at local and national levels.

In 2018 Bulgaria presented its first progress report on the implementation of the obligations under the UN Convention on the Rights of Persons with Disabilities before the Committee on the Rights of Persons with Disabilities. The presentation ended with specific country recommendations made to Bulgaria, in particular in the field of education. The Committee drew attention to the fact that segregated education systems still remain and there are cases of children with disabilities having been denied access to mainstream schools.

**RECOMMENDATIONS**

- Work actively towards building an accessible environment in each school and kindergarten, as well as in public buildings visited by children with disabilities, securing funding through the budget of the institution;

- Objectively assess the changes in the TEMP Ordinance to ensure that children with multiple disabilities are not disadvantaged. Introduce detailed individual assessments on a case-by-case basis, taking into account all aspects of support provision – health, educational and social needs of children with disabilities and their families;

- In the design of social, health and educational services: consider both equitable territorial coverage and demographic and statistical data on children in need of support;

- Create priority services for timely and effective support of children in the family, including home-based services. In an emergency: offer full-range services to parents, including psychological, social, health, legal and other services, to discontinue the process of child abandonment;

- In the process of legislation reforms and implementation of changes in support of children with disabilities and their families, seek dialogue with representatives of organisations working in this field and develop feedback mechanisms for families benefiting from support.
RIGHT TO FAMILY LIFE

26,422 children with disabilities in 2018.

1,445 children and young people with disabilities placed in Family-Type Placement Centres

Of whom 51 are children with disabilities in need of permanent medical care

93 newly placed children

Of whom 15 are children with disabilities in need of permanent medical care

ACCESS TO EDUCATION

760 students and 178 children with physical disabilities in individual and distance education due to health reasons

Total general education schools in 2017-2018 — 1,969

736 with ramps

123 with platform lifts

108 with elevators

849 with wheelchair-accessible bathrooms

CHILDREN WITH TEMP CERTIFICATES

4,070 (3.8 per 1,000) as a share of the total child population

Number of children under 16 with certified type and degree of disability

Children with 50-70% type and degree of disability — 47.0%

Main reason for certified type and degree of disability in children

- Respiratory system diseases: 21.9%
- Mental and behavioural disorders: 20.2%
- Congenital anomalies: 17.5%
- Nervous system diseases: 12.9%

Sources:
1. Based on information from the Agency for People with Disabilities
2. and 3. Decision under Access to Public Information Act, ref. No. РД 04-0001/24.01.2019 of the Executive Director of the Agency for Social Assistance; data validity as of 30 November 2018
4. Letter from Information Support Centre for Education, MES, ref. No. П-76/13.01.2019
5. Based on National Statistical Institute data
6. Healthcare 2018, a publication of the National Statistical Institute and the National Center of Public Health and Analyses

47 newly placed children

Of whom 15 are children with disabilities in need of permanent medical care
1. CHILD WELFARE
The government has taken a number of measures in the area of child welfare but has failed to achieve their desired impacts, i.e. to reduce child poverty, improve children’s development through more effective utilisation of their leisure time, and ensure a safe physical environment for children. Municipalities fail to recognise their role in organising children’s lives in safe and nurturing environments.

Child welfare in Bulgaria is conditional on multiple and diverse factors having a combined effect on the environment in which new generations are born and raised.

To start with, the overall demographic situation in Bulgaria is worse than in other EU countries. The country ranks fourth, after Croatia, Lithuania and Latvia, in terms of negative population growth. Compared to the EU, where the average growth is +2.2‰, in Bulgaria it is -7.3‰. On the one hand, this is due to the shorter life expectancy and higher mortality in the country; on the other, it is the result of persistent, albeit currently at a somewhat slower rate, migration tendencies, mostly in young people who either have or expect to have children soon. These are factors with direct socio-economic consequences, as an ever-decreasing number of working population must generate more and more income for pensions, healthcare, education and social services.

Like in previous years, the poor progress made in 2018 in key child welfare areas is very likely associated with decisions to delay parenthood to a later age. In terms of total fertility Bulgaria ranks in the mid-range of EU countries, with a rate of 1.54, compared with an EU average of 1.6. There has been a growth in the relative share of births in the age group over 35, coupled with postponement of second births. Future parents want to be better assured that their children will be able to grow in improved conditions, both in the family and in society overall.

Maintaining economic stability in the country should not be done at the expense of aggravating the conditions in which Bulgarian children are born and raised. Despite some positive changes, the lack of a family-focused policy approach at the central and local level and the yet incomplete integration of system services are major stopping blocks to the real fight against poverty.

“It’s so bad when on 15th September all children talk about their summer at the sea, and there’s always this one who has always wanted to see what it’s like ...”

an opinion expressed by a child.

In 2017, 41.6% of children were at risk of poverty or social exclusion.

Each fifth child lives in extremely poor housing conditions, and 60% of children reside in overcrowded households.

Source: EC Report on Bulgaria for 2019
Despite the increased social assistance benefits, which in itself is a good step forward, they are not seen as part of an overarching approach to support children and families, resulting in poor assistance effectiveness, especially in terms of poverty reduction.

Overcoming the systematic and long-lasting social exclusion of children and other vulnerable groups may not be achieved without structural changes in public services such as education and healthcare, as well as without binding social assistance benefits with social support and comprehensive assessment of support needs.

**Sport, culture, recreation and leisure time of children**

Leisure time of children and young people is to be construed as the time spent outside school, kindergarten or other planned and structured activities having a mandatory nature and defined by various national policies. For children under 14 leisure is mainly governed by the parents, and it is used to develop their skills and talents through attendance of various courses, workshops, private classes, interest clubs, extracurricular activities etc. The range of activities, the frequency of attendance and the prices of services vary in accordance with both the place – city or village – where the children live and the parents’ disposable income and awareness of such activities. At the age 14-18 leisure and its manner and/or lack of management is already at the discretion of the young person, who is influenced by parents, TV, school, roles models, fashion trends and celebrities.

**WHAT DID CHILDREN, PARENTS AND PROFESSIONALS WORKING WITH CHILDREN SAY?**

"Children don't practise sports because their parents have no money."

A total of 42% of the children who took part in the survey believe that the number of children who practise sports regularly is decreasing and that this is happening at a very fast rate. They recommend creating more free opportunities for practising sports and encouraging children to be more physically active. In addition, some also consider poverty to be a hindrance for children to practise sports.

**Making children’s playgrounds safe and modernising them**

In 2018 the government once again failed to fulfil the criteria set out in Ordinance 1 of 2009 of the Ministry of Regional Development and Public Works on the Terms and Procedure for Playgrounds Development and Safety. A large number of playgrounds – around 10,000 throughout the country – still fall short of the requirements laid down in the document. In accordance with its definitions, most can be classified as dangerous. The future of old playground facilities remains unclear.

The good news is that parents are becoming more active and are making better use of mobile applications and social media to resolve controversial issues. There is further a growing number of community initiatives and organisations that locally maintain playgrounds and protect them from building development. This is a major contributing factor to effective casework and public information provision.
RECOMMENDATIONS

- Develop a clear strategy to tackle the growth of child poverty nationwide, as processes will otherwise accelerate and become more difficult to manage. It is necessary to analyse the mechanisms of intergenerational poverty transmission and plan a set of measures to support children and their families in all areas – from employment and integrated social services to education and healthcare;

- Adopt a cross-sector strategy to promote and stimulate the re-thinking of leisure time, recreation and sports practices for children and young people, including safety standards and national and municipal budget funding provisions;

- Prepare municipal strategies for development of activities for young people and children based on mandatory consulting children and young people at local level, considering their views and suggestions, and incorporating them into action plans to the strategies;

- Approach urban development with a clear vision for locations for unstructured play for children and young people;

- Create accessible sports facilities and ensure transportation to skiing or other recreation areas at preferential prices for children.
2. PROTECTION OF CHILDREN FROM ALL FORMS OF VIOLENCE
In response to the amendments made to the Criminal Code concerning domestic violence, as well as in support of the efforts to change the Coordination Mechanism for cooperation on cases of child victims of violence or children at risk of violence and for cooperation in crisis interventions. In 2018 Bulgaria again failed to take appropriate measures to implement an integrated strategic approach to counter violence against children, and the situation in schools is particularly worrying. Each system involved in the issue keeps its own statistical records, but these are never integrated into a single database. The lack of a unified case registration and management system and common indicators (what is measured and how it is measured), coupled with a child protection system having reduced its operations to producing social reports at the request of the courts, has led to very worrying conclusions.

“All around us violence is a way of self-assertion, a claim to power and success. Every day we witness violence among adults, against women or people with different orientations, and against animals. This can’t but affect children and their relationships.”

an opinion of an adult survey participant, Report Card 2019: How Children, Parents and Professionals Evaluate the Government

School violence

Despite the measures foreseen in the current Mechanism to Counter Bullying and Violence in Pre-School and School Education, the system is still struggling with their implementation, as well as with the initiation of appropriate action to prevent aggression, bullying and violence. This is mostly due to the lack of capacity of a sufficient number and balanced deployment of support professionals in schools. The positive developments seen in 2018 included the development of a National Programme for Prevention of Child Violence and Child Abuse and the progress made under the project “Improving Child Protection and Prevention of Child Crime in Bulgaria”. These actions, however, are highly insufficient in offering children protection from Internet traps. In 2018 the National Hotline for Fighting Children’s Exposure to Illegal and Harmful Internet Content and Conduct received and processed a total of 6,297 alerts.
Child victims of crime, January-June 2018

<table>
<thead>
<tr>
<th>MINORS (under 14)</th>
<th>MINORS (14-18)</th>
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</thead>
<tbody>
<tr>
<td>Murder/ manslaughter</td>
<td>26</td>
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<tr>
<td>Rape/child molestation/ sexual assault</td>
<td>143</td>
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<tr>
<td>Assisted or coerced suicide</td>
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<td>Personal injury</td>
<td>39</td>
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<tr>
<td>Child neglect by parent(s)</td>
<td>71</td>
</tr>
<tr>
<td>Forced marriage/ cohabitation with children</td>
<td>54</td>
</tr>
</tbody>
</table>

Source: Prosecutor’s Office of Republic of Bulgaria

Domestic violence protection and penal policy in cases of domestic violence against children

After a straight and categorical devaluation of the issue of domestic violence and an underestimation of the need to take urgent comprehensive measures against it, the Bulgarian Parliament refused to ratify the Council of Europe Convention on preventing and combating violence against women and domestic violence, also known as the Istanbul Convention. Disputes over concepts that are somewhat foreign to the general public shifted the focus from the potential benefits of the Convention for victims of violence. Eventually, it was declared unconstitutional, which already affected the presentation and discussion of its concepts, on the one hand, and the possibilities for violence prevention through education, on the other. The current state of play of practice in Bulgaria reveals multiple gaps in the legislation and in the possibilities for protection and support of women and girl victims of violence.

Neglect and child abuse in cyberspace

In 2018 the National Hotline for Fighting Children’s Exposure to Illegal and Harmful Internet Content and Conduct received and processed a total of 6,297 alerts, including 6,083 reports about images of sexual exploitation of children (child pornography), 15 reports of child grooming etc. Of these, 2,255 were forwarded to General Directorate Combating Organised Crime, 3,696 were referred to other INHOPE hotlines, 3 were handed over to other competent national institutions, and 2 cases ended with requests to remove content considered harmful for children.

There are still legislative controversies surrounding the sexual exploitation of children over the Internet. The Criminal Code has criminalised the coercion of children under 14 to take part or to observe acts of sexual nature (whether real, virtual or simulated), with a corresponding penalty increase of up to five years of imprisonment. However, some texts in the Electronic Communications Act obstruct requests of traffic data to identify perpetrators of deeds not classified as serious crimes (over five years). Moreover, the Special Intelligence Means Act does not allow such means to be used in similar cases. At the same time, observation of sexual intercourse (whether real, virtual or simulated) is equated with participation in such acts, and the maximum penalty is again five years. Last but not least, judicial practice makes rare use of the very apt Article 155a of the Criminal Code, concerning paedophile assaults over the Internet and envisaging up to six years of imprisonment.
WHAT DID CHILDREN, PARENTS AND PROFESSIONALS WORKING WITH CHILDREN SAY?

Whom did we ask?
Children between 10 and 18, children placed in a crisis centre, adults.

What did the children say?
"Children shouldn't be hit no matter what [...] No one should have the right to hit a child."

Two-thirds of the children who took part in the survey believe that children often become victim to violence at home. Some said that domestic violence is the most common type of violence against children. Cases were mentioned where a child dialled "a number" (National Helpline for Children) to tell it all; however, no mention was made of what followed.

Some of the children involved in the focus groups noted that any person who happens to see a child suffering from violence should report immediately. We should not forget that children are often unwilling to discuss what they are going through. Therefore, it is important to talk more about these subjects so such children would dare to speak. It also needs to be made clear where to look for help if one becomes victim to violence.

RECOMMENDATIONS

- Coordinate the operations of the police, social services, prosecutor’s office, judiciary and healthcare system to ensure more effective cooperation on cases of violence against children by introducing a unified management information system for registration of all reports of violence against children and monitoring of their development;

- Strengthen the legislative position of the Coordination Mechanism by formulating relevant staff requirements and non-compliance sanctions, as well as ensuring possibilities for improvement on the basis of wide-ranging effectiveness analyses;

- Ensure that the government makes a clear priority of the issue of protection of children from domestic violence in its agenda by adopting the various safeguards for protection, support and prevention of domestic violence outlined in international law;

- The Supreme Judicial Council and the National Institute of Justice to consult the judges’ training programme on the Protection Against Domestic Violence Act and ensure the involvement of psychologists, social workers and other experts;

- Strengthen and ensure the successful implementation of the Mechanism to Counter Bullying and Violence in the Pre-School and School Education System at school and municipal levels by increasing the coordination efficiency of all institutions concerned;

- Fine-tune the legal framework to reflect the latest trends in countering child sexual assault over the Internet so as to ensure effective identification of perpetrators and penalties matching the gravity of the crime;

- The state agencies to fulfil their commitment to co-finance the operations of the Bulgarian Safer Internet Centre and support training activities for children and young people on responsible and safe use of information and communications technology;

- Plan and roll out a systematic approach using state educational requirements and an appropriate introduction of the concept of the Internet as a chief means of communication and socialisation in the curriculum of social sciences and civic education subjects.
EARLY CHILDHOOD DEVELOPMENT
In spite of the declared intentions and efforts, the provision of integrated services for early childhood development in Bulgaria is still insufficient. There are problems in the interaction and coordination between the different systems involved in meeting the needs of children at an early age.

Early childhood development policies were identified as one of the social priorities of the Bulgarian Presidency of the Council of the European Union in the first half of 2018. During this time and following a proposal from the Bulgarian government, the Council adopted conclusions on integrated early childhood development policies, reaffirming their importance for moving forward in the fight against poverty and social exclusion and referencing the European Pillar of Social Rights, proclaimed in 2017, which puts primary focus on early childhood education and care.

The adoption of an integrated cross-sector strategy for early childhood development in Bulgaria is one of the main demands of the players in this field, including the informal Alliance for Early Childhood Development, established by 50 organisations and professionals in 2018. As a result of active advocacy, in September an interinstitutional working group was set up at the Ministry of Education and Science with the task to develop a National Early Childhood Development Strategy. The group met a number of times in 2018, and the strategy is expected to be ready by mid-2019. The creation of the working group is a positive step, as is the appointment of a civil society representative as its deputy-chairperson.

Healthcare during pregnancy and after childbirth plays a key role in ensuring early childhood development. The National Programme for Improvement of Maternal and Child Health 2014-2020 is the main strategic document on the implementation of maternal and child health policies, measures and services. It encompasses a total of 31 health counselling centres, providing specialised counselling and care to pregnant women, mothers-to-be with pathological pregnancies, children, children with disabilities and chronic diseases, and preterm infants. One of its achievements is the development of a mechanism and the introduction of new-born hearing screening in medical facilities with neonatal units for early diagnosis and timely intervention in cases of hearing loss in infants, which has been operating sustainably since 2015. According to Ministry of Health data, by late September 2018 medical checks were given to 40,786 children, compared to 60,000 planned for the whole year. A brief check shows that in the same period of 2017 the number of serviced children was 42,208, against a target of 55,000.

At the same time, however, the common tendency to reduce the operations of health counselling centres raises serious concerns. From January to September 2018, only 5,684 medical consultations and home visits were made against a total of 12,000 planned for the whole year.
Despite the provisions for free pregnancy monitoring examinations, many uninsured pregnant women do not have access to specialised services. In the course of 2018, there were a total of 7,172 births by uninsured women, 2,805 examinations by obstetrics and gynaecology specialists, and 9,664 medical and advisory services falling within the terms of Ordinance 26/2007 of the Ministry of Health.

| Source: National Health Insurance Fund |

**Medical consultations and home visits**

- **2015 – 2016**
  - September to September: 13,230
  - January to September: 6,192
  - Target: 30,000

- **2017**
  - January to September: 5,684
  - Target: 12,000

**Пример за извършени прегледи на здравно неосигурени бременни жени**

- Sofia: 585 ➔ 2 examinations by obstetrician-gynaecologist
- Plovdiv: 591 ➔ 4 examinations by obstetrician-gynaecologist
- Sliven: 674 ➔ 365 examinations by obstetrician-gynaecologist

**Early Learning**

As of 31 December 2017, there were 32,429 children attending crèches, amounting to 12.3% coverage of the total population aged between 0 and 3 years. Adding the number of those attending crèches groups renders a total of 52,522 (20% coverage) of 0-3-year-olds in early childhood education and care services. This proportion is still considerably below the EU (Barcelona) target of 33%.

Good-quality pre-school education is also key to early childhood development and preparation for primary education. The share of children aged 3-6 in kindergartens in 2017-2018 amounted to 81%, which again is far below the Barcelona target of 95%.

**Coverage of early childhood education and care**

- **0-3 years**
  - 20%
  - EU target: 33%

- **3-6 years**
  - 81%
  - EU target: 95%
Early childhood intervention

Early childhood development services should be accessible to all children, including those with disabilities, special needs and developmental delays. There is no data available on the number of such children in crèches; as for kindergartens, in 2017-2018 they totalled 3,342. It is crucial that learning difficulties and developmental delays be identified as early as possible. Based on Ministry of Education and Science data, in 2017-2018 training on introduction and implementation of early screening for learning difficulties in 3-3.5-year-olds was delivered to 1,752 professionals from kindergartens; however, a corresponding validated tool kit is yet to be put in place.

The National Network for Children commissioned the services of an international consultant to assess the legal and policy framework needs for introduction of early childhood intervention (ECI). On this basis recommendations were formulated and concrete steps were identified to set up a national system and develop services for parents and young-age children with diagnosed developmental delays, disabilities and/or mental health support needs.

Child protection, security and safety

A positive fact that needs to be mentioned is the discontinued placement of children under the age of 3 in homes for medical and social care for children as of May 2018 by virtue of Order of the Agency for Social Assistance, as well as the initiated nationwide closure of all remaining such institutions later on in the same year.

In their totality these measures are expected to guarantee the right of every child to grow in a family environment, which in itself is of major significance. This is why family environment and nurturing care are some of the areas of early childhood impact that should be incorporated in the Early Childhood Development Strategy as a powerful mechanism to support parents and promote nurturing parenting at all stages of children’s development.

RECOMMENDATIONS

- Adopt a unified cross-sector Early Childhood Development Strategy to be recognised as a wide-ranging joint action platform for all institutions and stakeholders;
- Develop and validate an organisational structure, unified methodology and working standards, and a monitoring and control system for health counselling centres for maternal and child health in Bulgaria;
- Fully incorporate into the legal framework and practice the WHO recommendations of 2016 on follow-up examinations for all pregnant women;
- Introduce integrated home visiting services for pregnant women and young children;
- Change the statistical data collection and registration method to obtain key missing data and generate realistic and reliable information on children's development;
- Set up a nationwide preterm births register to follow up babies’ development after discharge from maternity hospitals until the age of 3, as well as to ensure the availability of the necessary community-based social services;
- Introduce mandatory national screening for diagnosis and therapy of retinopathies in preterm infants;
- Introduce in the practice uniform early childhood development standards;
- Take measures to increase the number of children in early childhood education and care services;
- Change the care provision approach in crèches – from primarily medical to instructional/educational, as well as the job requirements – more teaching over medical staff;
- Take measures to promote breastfeeding, improve children’s nutrition and promote healthy parental behaviour;
- Ensure sustainability for integrated early childhood development services and expand the services network, including for early childhood intervention;
- Ensure ongoing monitoring of the effectiveness of measures to prevent child abandonment and family separation, and where this is impossible, offer family-based care in foster families;
- Improve the professional skills of specialists working in different institutions and services for young children in order to enhance their awareness of early childhood development and strengthen their skills to interact with families;
- Conduct information campaigns on the importance of early childhood as a unique period in the human life and raise parents’ awareness of the need for nurturing and responsive care.
There is still a clear need for joint efforts and focused attention to pressing issues, as well as for adoption of a complex approach to children's health needs.

Vaccine prophylaxis

Several major problems have been reported in regard to vaccine prophylaxis in Bulgaria. One of the most important issues is that compulsory immunisation coverage is below the recommended minimum. Coverage under the national compulsory immunisation schedule for the age group 0-1 varies in the 90.4-95.8% range for different vaccinations, i.e. it can be considered satisfactory. For 1.5-year-olds, however, the 65.1% coverage against diphtheria, tetanus, pertussis, polio and haemophilus influenzae is rather worrying. The immunisation of preschool aged children (6 years) is a particular concern, as coverage against diphtheria, tetanus, pertussus and polio in this age groups is only 49.4%.

National Multi-profile Paediatric Hospital

In 2018, following a series of letters to institutions, raising the issue at a joint national budget session of the Budget, Health and Social Committees at the National Assembly, and meetings with the Minister of Health, Mr. Kiril Ananiev towards the end of the year, the urgent need to build a high-technology University Multi-profile Paediatric Hospital permanently stood on the political agenda and was assigned top priority in the area of child health.

CHILDREN’S OPINIONS EXPRESSED IN SURVEYS ORGANISED BY NEF AND MEGAPHONE

What do you think a hospital in which children can receive good health care and appropriate treatment should look like?

The hospital needs to be colourful and friendly to be suitable for children, is what young people said. There should be toys there, and it should be cosy for children to feel at home. The temperature in the rooms should be suitable, i.e. warm. Many respondents said that a children’s hospital should not be as frightening as other health facilities, and should not look like a prison, so that children would not be afraid to enter, but should feel relaxed for the time of their stay. There should be toys for toddlers, as well as drawings on the walls and spaces where they can play and interact with other children.

The second most important factor according to the children is the good attitude of doctors. A child in a hospital mostly needs good care and attention, genuinely nice doctors and nurses, smiling and cheerful staff, but also equal attention should be given to all children. Nurses should be kind and caring, able to entertain the children and make them forget their illnesses, whereas doctors should be friendly rather than “just trying to find a way to drain the health insurance fund.” It was also mentioned that the staff of a children’s hospital should provide at least minimum comfort to their child patients, as they are probably very scared, and should also look for ways to improve the emotional and psychological comfort of the children during their stay.

As regards equipment, the hospital should have sufficient appliances, medical supplies, staff and everything else that is necessary, as well as specialised high-tech equipment for children. Hygiene should also be top-level, and it should not be squalid, is what young people said.
**Mental health**

In 2018, based on Ministry of Health data, the number of actively practising paediatric psychiatrists in the country was 18, two of whom having acquired specialties in Child Psychiatry in the same period. The number of inpatient beds for children with mental disorders as of 31 December 2018 was in total 52 in Sofia, Varna and Targovishte. There was no information nor dedicated studies on the dynamics of mental illnesses among the child population under 18.

Mental healthcare provision for children and young people remains insufficient, without any clear prospects of finding adequate solutions.

**Drug use by children and access restriction measures**

Drug use among Bulgarian students is high according to the European School Survey on Alcohol and Other Drugs (ESPAD), which collects data on substance use among 15- and 16-year-olds and monitors trends in different countries.

Illegal substances in Bulgaria are considered to be the most easily accessible throughout Europe. ESPAD found that 44% of respondents thought that marijuana is easily accessible, 23% of Bulgarian students found amphetamines readily available, and 17% believed that methamphetamines are not difficult to obtain.

**Smoking, alcohol and hookah use by children**

The Global Youth Tobacco Study (GYTS) was developed by WHO’s Tobacco Free Initiative and CDC’s Office on Smoking and Health. In Bulgaria it was conducted by the National Center of Public Health and Analyses in 2002, 2008 and 2015. The results provide an up-to-date and unique nationally representative information on the use of tobacco products, as well as its underlying reasons, and on the dynamics of its 14-year history among Bulgarian students aged 13-15.

Analysis of the results has shown a steady overall downward trend in cigarette experimentation, as the number of experimenters has decreased by 16.8% over the three rounds of the study.

Alcohol drinking, and specifically alcohol abuse, is one of the signs of unhealthy living and a problem in most world’s countries, including Bulgaria. In addition to being addictive, alcohol causes various mental, neurological and somatic diseases, and is a risk factor for a number of socially significant diseases.

According to the 2014 National Health Risk Factors Study, over 62% of children aged 10-19 had tried alcohol, the average age of first use being 13 years. A total of 48% used alcohol, of whom 1.4% on a daily basis and 46.6% sometimes. 2.6% of students were drunk more than 10 times in the course of the year, with the highest share being 15-19-year-old boys. 5.7% of respondents admitted to alcohol abuse on 4 to 7 occasions.

**Infant mortality**

2017 retained the steady downward trend in infant mortality rate, with a value of 6.4 deaths of children under one year of age per 1,000 live births. If this rate is to be retained, the value is likely to drop to 4.7 by 2020, and eventually by 2023-2024 to reach the average European rate of 3.6 per 1,000 live births.

In spite of these positive developments, regional infant mortality rates continue to raise concerns. Unlike regions like Vidin and Sofia, where infant mortality averages 1.7% and 2.6% respectively, in Dobrich it amounts to 12.9%, in Sliven to 12.3%, and in Pazardzhik to 11.1%. There are large differences between urban and rural mortality rates, e.g. 0.0% for urban areas in Vidin Region against 21.8% for rural areas in Ruse region.
RECOMMENDATIONS

- Organise annual immunisation campaigns and maintain public media headings with backing from the Ministry of Health;

- Establish a more effective adverse reaction registration and reporting system for vaccine prophylaxis;

- Ensure that the government involves municipalities in the design and implementation of national health strategies and programmes, including for adoption of budgets and action plans;

- Ensure that the government raises the requirements for top municipal management’s knowledge of national policies aimed at improving the access to healthcare for representatives of vulnerable groups. Take appropriate action to guarantee better access and higher quality of health services by identifying and analysing the specific needs of the population in each location (city, town, village) and developing health mediator activities based on people’s actual needs;

- Establish a transparent mechanism and conduct wide public consultation to prepare technical specifications for design of a national paediatric hospital in line with good international practice and involve all stakeholders;

- Take decisive action towards conducting a child mental health survey to identify care services and care programme needs, required numbers of specialists and nationwide roll-out potential, as well as to inform the development of a dedicated data- and analysis-based policy on child mental health;

- Establish a working mechanism redirecting resources collected in the form of excise tax on tobacco products and alcoholic beverages towards the implementation of activities under national programmes aimed at restricting smoking and alcohol abuse and non-use of narcotic substances;

- As a matter of urgency: submit the proposed amendments to the Health Act relating to the restriction of smoking to the Council of Ministers and the National Assembly;

- In 2019: following a detailed analysis and broad public consultation on the implementation of the National Programme for Prevention of Chronic Non-Communicable Diseases 2014-2020, initiate development of a new programme for the next 7-year period ensuring NGO involvement;

- Develop specialised health and social services and treatment and early intervention programmes for children and young people experimenting with narcotic substances;

- Develop and implement programmes for parents to improve the communication and relationships with their children and teenagers;

- Engage the Minister of Health to set up a working group with representatives from all ministries and agencies and NGO representatives to conduct an analysis of children’s nutrition and recommend measures for improvement;

- Develop an effective mechanism to ensure communication and coordination between relevant institutions, formulate measures to improve control, re-examine the objectives and organisation provisions of the programmes “School Fruit”, “School Milk” and “School Snacks”, and propose a common funding instrument for school food supply;

- Continue to take targeted action to implement all adopted programmes and regulations for overall reduction of infant mortality, and in particular in the areas with the highest rates.
5. EDUCATION
In response to the clearly expressed political will to modernise and develop the education system and the improved funding provision in certain areas. At the same time, however, inclusive education, overcoming students’ functional illiteracy, the need for desegregation, and measures to improve pre-school and early education, for which currently no reforms have been initiated or planned, continue to pose challenges.

Educational segregation has exacerbated and reached alarming proportions. According to data from the National Electronic Information System of Pre-School and School Education, nearly 40% of schools and kindergartens are visited by children whose parents have lower than secondary or even primary educational, and over 26% of educational institutions instruct only children of parents with secondary or tertiary education.

Based on their learning achievements, the quality of education in the former group is significantly lower. Speeding up desegregation will require strong political will, paired with regulatory and legal changes and targeted action on behalf of the Ministry of Education and Science and the Regional Directorates of Education.

Proportion of 15-year-olds in Bulgaria underachieving in:

<table>
<thead>
<tr>
<th>Subject</th>
<th>2014</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reading</td>
<td>39.4%</td>
<td>41.5%</td>
</tr>
<tr>
<td>Maths</td>
<td>43.8%</td>
<td>42.1%</td>
</tr>
<tr>
<td>Science</td>
<td>36.9%</td>
<td>37.9%</td>
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</table>

Source: Education and Training Monitor 2018 Bulgaria, European Commission
Ensuring full coverage in pre-school and school education is one of the main political commitments, whose fulfilment in 2018 was monitored by the Joint Work Mechanism for Coverage and Retention of Children and Students at Compulsory and Pre-School Age in the Education System. Despite its obvious advantages, the mechanism also has some serious limitations. The envisaged involvement of parents, NGOs and local communities is insignificant, since local-based teams may include mediators and NGOs, but this is a matter of choice rather than obligation. Effective local participation is not foreseen for institutional and organisational representatives and experts working directly with communities and having full knowledge of their problems. There is no financial, logistical and other support provision for their involvement. Last but not least, the mechanism relies on certain immediate-effect but less sustainable measures, having no major long-term contribution to the well-being of children and families.

Implementation effect of the Mechanism in the school year 2017-2018

- **2,124 (8.9%)** second-time dropouts of returning children and students
- **23,898** returning children or students or enrolled for the first time in the education system

**Reasons for second dropout**

- **8%** Health problems of child or parent
- **2%** Commencement of cohabitation
- **2%** Crime perpetration
- **35%** Family moving abroad
- **18%** Family relocation without registering/deregistering the child at/from school or kindergarten
- **18%** Unwillingness or neglect by parents
- **17%** Cause not clear, unable to locate child at address of residence

Source: Education 2030: Are Results Close, a monitoring report 2018-2019

**More young school teachers**

In 2018 the issue of teacher shortages in Bulgarian education was certainly on the agenda. It has been clear for years that about half of the teachers currently in employment will soon be retiring and that this cannot be offset by the number of newcomers to the system. The same is true for teachers in kindergartens, where the situation is even worse. In addition, teacher training programmes have, for the most part, not been altered in any significant way for decades, which does not offer future teachers any adequate preparation for school work. Despite the substantial increase in the funding earmarked for additional skills training for teachers in recent years and the steady growth in the number of training providers, no analysis has been done on the quality and results of those courses.
Inclusive education

The inclusive education reform has enabled schools to become support centres for children. Larger numbers of resource teachers, psychologists and speech therapists have been employed, mainly in schools, thus ensuring opportunities for timely and effective support provision for children and students. Starting in 2019, in accordance with the new National Programme for Prevention and Protection against Domestic Violence, each school with up to 350 children will be expected to employ a psychologist.

As of 15 September 2018, the total of children and students supported by resource teams at school was 18,116, including children enrolled in school but actually studying in specialised educational support centres (2,893 children) or in special schools (811 children). The number of children enjoying similar support in kindergartens was 3,480, including those attending special educational support centres.

The lack of detailed analysis of inclusion practices throughout the country remains an obstacle. There is no adequate data collection of the number of children and young people with disabilities outside the education system and of inclusion measures; nor is there an independent mechanism for monitoring and assessment of the quality of implementation of inclusive education. There is still no dialogue for reaching public consensus about the type of children and students we would like to raise, but also about the risk and safeguards for their development.

In its review of the situation in Bulgaria in 2018, the UN Committee on the Rights of Persons with Disabilities drew attention to the low level of awareness of the benefits of inclusive education and recommended an information campaign, in particular among teaching professionals and directors, in order to avoid purely administrative compliance with inclusive education requirements and ensure its practical implementation for the benefit of children.

**What did children, parents and professionals working with children say?**

“Inclusive education is necessary so every child can develop and grow in society, having received the necessary education.”

*As expressed by a child.*
RECOMMENDATIONS

- Adopt effective measures within the framework of delegated budgets to reduce the funding disproportion between urban and rural schools;
- Sustain funding allocations for work with vulnerable groups and make them conditional on outcomes; expertly evaluate the actual effectiveness of all measures taken to improve financial efficiency;
- Take targeted action to introduce intercultural education in school curricula;
- Shift the focus of the Mechanism for dropout prevention to ensure sufficient conditions for good-quality education, knowledge acquisition, and skills and habits development ensuring a sustainable reintegration for children, including through innovative educational methods and resource support for children leaving the country together with their parents for temporary or longer periods with the help of Internet resources and web-based learning platforms;
- Improve the mechanism’s information security and the coordination between institutions in the exchange of information in order to raise the efficiency of the process, e.g. by setting up a database of children having left the country permanently or temporarily to monitor their status;
- Strengthen working with parents as part of schools’ approach to community building and in support of the inclusion of all children, using the opportunities of the operational programme Science and Education for Smart Growth (including the Support for Success project), state-budget funded programmes, and participation incentives for municipalities and local communities, including through financing measures to improve inclusive education in accordance with specific needs;
- Establish a tool for quality measurement of additional skills training for teachers to ensure a more effective and targeted use of resources in this field;
- Develop a programme for directors’ training on leadership skills and development of school educational policies as part of the community;
- Introduce clear measurement of the work of school directors, which could be used as a basis for encouraging and disseminating good practice and support measures;
- Adopt a common definition and interpretation of the concept of personal development of children and students, and achieve consensus on why targeted personal development of students is necessary;
- Annually prepare and publicly communicate a detailed analysis based on qualitative and quantitative data on the effect of and the provisions of provided general support and additional support (separately), disaggregated by type of school, type of children’s needs, and area, including failed and untimely support provision for children and students;
- Increase the number of non-teaching staff in all schools and kindergartens – psychologists, speech therapists, social workers etc.;
- Initiate a comprehensive review of school curricula, to be performed by the Ministry of Education and Science, aimed at developing digital and media literacy in children at an early stage and up to completion of secondary education, and incorporate it into the requirements for all appropriate subjects.
6. FAMILY ENVIRONMENT AND ALTERNATIVE CARE
Although deinstitutionalisation is in progress, no measures have been taken to improve the quality of life of children placed in Family-Type Placement Centres and the quality of family support services. Foster care provision is still centrally managed and with only one service provider - the municipalities. There has been no improvement in adoption practices nor in the protection and integration of refugee children.

As of May 2018, the placement of under-three-year-olds without disabilities in homes for medical and social care for children has been officially suspended. Certain legislative changes have been initiated to expand and upgrade the service provision in community support centres, day care centres for children with disabilities, and centres for social rehabilitation and integration. The Ordinance on Prevention and Reintegration has been updated and a draft respite care concept has been developed.

Moreover, a Social Services Bill has been prepared, aiming to significantly improve the accessibility, quality and efficiency of such services. The NGO sector has been involved in the development of all of the above-mentioned laws and regulations, but their practical implementation is yet to be achieved with the aim of not only terminating institutionalised child care but also significantly reducing the number of children in formal care.

As of 2018 the placement under-three-year-olds without disabilities in specialised institutions has been suspended.

Number of children in specialised institutions

2010 = 7,587
> 90%
2018 = 653

All through the year the quality of care provision in Family-Type Placement Centres remained a hot topic, but no adequate decisions were offered. Yet another public scandal about violence against children in a Family-Type Placement Centre (FTPC) triggered a wave of reactions – SACP inspections, BHC monitoring, NGO analyses and opinions. The Permanent Expert Working Group on Deinstitutionalisation at the SACP, which also involves also civil organisations, was commissioned to prepare a residential care analysis and proposals for improvement. The report was also to address the issue of the lack of interest in FTPC service on behalf of private service providers. One of the most serious challenges identified was the low financial standard (BGN 9,700), especially for FTPC for children with disabilities (BGN 11,580) and for FTPC for children and young people with disabilities and need of permanent medical care (BGN 15,580). Solid argumentation in favour of raising the standard by 40% was proposed. Sadly, the actual increase was by only 18%, 10% of which offsetting the increase in the minimum wage and the overall rise in overhead costs.
Foster care

In 2018 the Foster Me 2015 project remained the sole government initiative (EU-funded) for analysis, examination and monitoring of progress in foster care. In the course of the year it focused on the quality of the supervision for foster parents and social workers, as well as development of competences for assessment of foster family by Foster Care Panels through training provision for their members.

As of 30 November 2018, there were a total of 2,250 children placed with foster families, of whom only 4 with volunteer foster families. As of the same date, the number of approved foster families was 2,354, including 7 on a voluntary basis. In 2018 the largest number of children placed with foster families was in the age group 6-14 years, whereas those aged 0-3 totalled 628. Children with disabilities in foster care in 2018 totalled 175. Those leaving foster care mainly go to adoptive families (586 in 2018) or are reintegrated into their birth family (241). Despite the positive statistics and the increased number of children who have been in foster care (a natural stage in the de-institutionalisation process and the systematic closure of specialised institutions for children), some key issues could be mentioned that were not addressed in 2018 as well. These were: the high number of foster families without children placed with them; it was not possible to hire parents under employment relationships like the social workers employed under the Foster Me 2015 project. Civil-based working arrangements (also known as civil contracts) meant that foster families could not enjoy the opportunity to claim temporary incapacity or unemployment benefits. The development of a common financial standard for foster care was postponed and eventually failed.
Adoption

The initiated amendment to the Family Code, launched in 2016, failed to move forward yet again in 2018. Directly resulting from this was the persistent lack of a legal framework and administrative procedures to adequately regulate it, including both collection and storage of as detailed information as can possibly be obtained about birth parents and siblings, and regulation of access to such data to protect the interests of all three parties in the adoptive process — the child’s right to information about his/her birth family.

Amendments to the Labour Code of 1 July 2018 entitled all adopters of children up to 5 years old to leave of absence for up to 365 days of the date of actual placement of the adopted child with them.

Protection and integration of unaccompanied minors

The number of unaccompanied children under 18 having sought international protection in Bulgaria in the period from 1 January to 31 October 2018 totalled 482, almost the same as the year before. Of those 40 were minors under 14. By the end of October, 27 of them had been granted international protection, 42 had been denied, and 168 had had their approval procedures terminated without an explanation of the reasons.

Data comparisons highlight persistent problems, such as safe and secure placement provision and the associated decrease in the number of missing children. Another challenge is the provision of good representation as a rights and best-interest safeguard, as well as the access to healthcare, education and social services to meet current needs.

The Coordination mechanism for cooperation between child protection authorities at national and local levels for working on cases of child foreign nationals seeking or having been granted international protection, which had been expected for years, was not adopted in 2018.

Access to community-based social services for any unaccompanied person remains severely hampered by the language barrier and the lack of skilled professionals. Trained social workers from Child Protection Departments who took part in the survey conducted by the UNHCR in 2018 rarely proved able to provide systematic support due to heavy work overloads.

RECOMMENDATIONS

- Analyse and assess the experience gained in the development of foster care in Bulgaria, its relations to other services and possibilities for decentralised provision in the near future in view of the completion of the Foster Me project. Give extra consideration to developing foster care for children with disabilities as the envisaged closure of the homes for medical and social care for children continues to be hindered by faults in the service coverage at national level;

- Act on all recommendations of the residential care report prepared in 2018 within the Permanent Expert Group on Deinstitutionalisation, including those on formulation of adequate financial standard. Take extra care and make special efforts to separate the place of living for children in residential services from the place where they use specialised services so as to avoid re-institutionalisation.

- Act on the UNHRC Universal Periodic Review of Bulgaria 2011 recommendation for adoption of legislation prohibiting the confidentiality of birth origin and identifying a methodology for collection, storage and access to information protecting the interests of all three parties;

- Formulate a vision and a comprehensive plan for the development of foster care in Bulgaria and ensure future provision of the service after the closure of the Foster Me project;

- Develop and adopt in due time action plans to the National Strategy for Integration of Person Having Been Granted International Protection in Republic of Bulgaria 2014-2020 and the National Strategy on Migration, Asylum and Integration 2015-2020, including definition of concrete measures, performance indicators, timeframe for action and responsible institutions;

- Ensure effective access to community-based health, educational and social services for unaccompanied children.
7. JUSTICE FOR CHILDREN
Reflecting the lack of understanding for the reform of the child justice system, overdue by 10 years. All efforts for legislative or political changes are sporadic and fail to achieve the desired results.

In 2018, just like in previous years, the justice for children reform in Bulgaria did not make any progress. Despite changes being made in some areas, all action is fragmentary and lacks the much needed in-depth and multilateral discussion of policy and legislation on children’s rights. The state, which has signed a number of international documents, more specifically the UN Convention on the Rights of the Child, continues to refuse to take any action towards ensuring the right of access to justice for children, thus also failing to provide protection for all other rights. Moreover, even if progress can be seen in some other fields of public life, justice for children remains largely misaligned to international justice standards addressing children’s needs.

Bulgaria continues to have no child-friendly judicial system, nor provisions for mandatory specialised training for all professionals involved in the contact of children to the justice system.

2018 continued the already established trend of either surpassing or retaining the number of child victims of crime from previous years. The diagram below shows the number of child victims as per pre-trial proceedings initiated in the first half of 2018 and is based on data from the Prosecutor’s Office of Republic of Bulgaria.

What is more, over a year after the entry into force of the provisions for transposition of Directive 2012/29/EU into the Code of Criminal Procedure, the national legislature’s inapt transposition approach continues to create practical problems and barriers to the effective implementation of safeguards to support child victims of crime.

Despite the ongoing creation of more specialised facilities for accommodation, hearing and interviewing of children, also known as blue rooms, in 2018 they continued to be operated without any established rules or procedure, and overall were very rarely used.
“It was uncomfortable having to repeat several times what had happened — police officers, investigating officers, some sort of preliminary investigation officers, I don’t know their exact jobs, but it was uncomfortable having to tell the same things more than once.”

(Bulgaria, 16-year-old boy victim and witness in a sexual abuse court case)

Rights of children in conflict with the law

The system for dealing with children in conflict with the law continued to operate out of tune with international standards, and the “justice for children reform”, envisaged in multiple strategic documents, never to come through. Despite the faults in the current legislation, identified by none other than the Ministry of Justice, no systematic change has been initiated, leaving tens of thousands of Bulgarian children stuck in a system in contradiction with the international standards. The absence of political will for consensus in favour of children prevents any reform from happening and clearly shows the lack of understanding and institutional capacity to work with children in conflict with the law.

Reform failure means that, mostly as a result of the absence of other alternatives, children continue to be deprived of liberty in correctional boarding schools (CBS) and socio-educational boarding schools (SEBS). At the end of 2018, a total of 109 children were placed in the four CBSs and one SEBS still in operation. Despite the annually decreasing number of placements in such institutions, whose conditions and lack of professionalised care have been subject to ongoing critique by national and international bodies, the government should, as a matter of urgency, initiate their closure and terminate the placement of new children there.

In 2018 the four Child Rights Centres established under a project of the National Network for Children continued to operate and provide services to children in conflict with the law and children with behavioural problems. The centres are located in Vratsa, Ruse, Sofia and Pazardzhik, and their aim is to introduce new methods of work with such children and to establish practices for the implementation of Directive (EU) 2016/800 on procedural safeguards for children who are suspects or accused persons in criminal proceedings, whose transposition deadline is 11 June 2019.

Ensuring the best interests of children involved in legal proceedings; legal proceedings under the Family Code — parental conflicts

The National Strategy for the Child 2008-2018 envisages introduction of a series of measures including:

- Introduction of specialised training for judges working with children;
- Preparation of programmes by the National Institute of Justice with contributions from family and child law practitioners, child psychologists and social workers, and systematic training delivery for judges and lawyers on the specifics of child development and communication with children;
- Introduction of a full range of safeguards for child participation in proceedings under the Civil Procedure Code and provisions for parents in the Family Code for obligatory consulting with children on all matters that affect them.

Unfortunately, as of the present moment, which also coincides with the Strategy closing date, the government has still failed to take any serious measures for their practical implementation.
RECOMMENDATIONS

➔ Establish a uniform methodology to determine the best interests of the child, as well as a standard for its application to children’s hearings and testimonial/opinion sharing in criminal and civil proceedings. In addition to this – increase the available funding for skills improvement of specialists engaged in such procedures and for provision of targeted training on application of the uniform interviewing/hearing criteria and procedures involving children, including for ensuring strict compliance with the eventually adopted standard and analysing the impact of its implementation;

➔ Based on the analysis: amend the Code of Criminal Procedure to ensure full implementation of the requirements of Directive 2019/29/EU so as to guarantee access to protection measures to child victims of violence and crime, including hearings/interviews in dedicated facilities, of which the victim needs to be appropriately informed at the time of first contact, as well as at any subsequent instance of contact with the protection system, the police or the judiciary;

➔ Submit the Deviation from Criminal Proceedings and Imposition of Correctional Measures on Minors Bill and the associated amendments to the Criminal Code and the Code of Criminal Procedure to the National Assembly, having previously clarified the role of social services and ensured resource backing for their responsibilities to support children in conflict with the law and children under the minimum age of criminal liability; develop an action plan to enforce the new legislation, thus providing a framework and clarity as regards the management of all planned changes and a time schedule for their roll-out;

➔ Set up interinstitutional and multidisciplinary teams, including external experts and NGO representatives, to draw up individual closure plans for the CBS and SEBS and for referring the children and young people currently placed there to new forms of support and correctional measures;

➔ Introduce specialised training for all professionals who ensure the participation of children in legal procedures in accordance with the provisions of Article 15 of the Child Protection Act;

➔ Develop a monitoring mechanism for the preparation and soundness of court decisions or mediation-based settlements on family cases, as well as a unified mechanism to inform parents of the negative effect of the parental alienation syndrome on child psyche and the impact of court proceedings under the Family Code on children’s development;

➔ Take urgent measures to ensure compliance with the recommendations of the Committee on the Rights of the Child.
CHILD PARTICIPATION
Child participation is increasingly turning into a hot topic, but mostly so in a declarative way, while implementation is lagging further behind European and international standards. The child is still seen as an object rather than a human being in need of understanding, respect and support.

There is no clear understanding, in either society or institutions, of what genuine child participation means and why it is important and should be promoted. No consistent policies and financial provisions have been put in place to enable children to be more active and to voice their opinions on various issues that concern them. The latter have been left entirely to the personal motivation of children or to the initiative of various non-governmental organisations and international financial backing.

In 2018 the State Agency for Child Protection and the Ombudsman were the main institutions making conscious efforts to develop child participation. This was mostly achieved through the Children’s Council, based on the 2018 assessment of child participation in accordance with the Council of Europe Child Participation Assessment Tool and the strategic goal set out in the new Draft National Strategy for the Child 2019-2030: Ensuring Opportunities for Child Participation in the Decision-Making on Matters that Affect Children. Particular mention needs to be made of the consultation with children during the consolation process for the preparation of the strategy, as well as of the impact of this consultation.

Conscious efforts are made to maintain the already established good practice to coordinate the meetings of the National Child Protection Council and the Children’s Council. Unfortunately, however, the practice of consulting the Children’s Council on all topics continues as well. From a sociological perspective, the data thus obtained are not legitimate, and, at the same time, this poses a requirement on members of the Council to be very well prepared on each topic in order to make constructive contributions.

The impact of children’s opinions is still insignificant. Despite the progress made by involving children in drafting the new National Strategy for the Child and the fact that their opinions, expressed mainly by the Children’s Council, actually reach the decision-makers on child policies, they are still not taken seriously enough and feedback remains strictly formal. One of the main reasons for this is precisely the lack of diverse forms of child participation and the fact that the same group of children is consulted on all topics.

**RECOMMENDATIONS**

- Create diverse forms and spaces to ensure participation of children with different interests and needs;
- Draw institutions’ attention to individual child participation, especially in the case of court or administrative procedures, through children’s rights focused training delivery for professionals;
- Make use of the opportunity provided by mandatory ex-ante impact assessment before the amendment/adoptions of any legal act to consult children’s opinions;
- Provide extra training on children’s rights enforcement to professionals in different fields – education, healthcare, social work, justice and law enforcement, including both those directly working with children and administrative staff;
- Adopt an approach to “translate” the policies and documents for which children’s opinions are to be sought in a more child-friendly and understandable language;
- Use more and diverse online and digital platforms in the consultation process to capture children’s individual opinions rather than just group ones.
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<td>**Step by Step’ Foundation Foundation **</td>
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<td>‘Academica 245’ Association – Antonovo</td>
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<td>‘Naya’ Association – Targovishte Club of NGOs – Targovishte</td>
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<td>Municipal School Board of Trustees – Bolarovo</td>
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<td>Chitalishte ‘Umenie 2003’ – Yambol</td>
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