WHAT IS THE AVERAGE GOVERNMENT SCORE FOR CHILDCARE?
REPORT CARD 2020
WHAT IS THE AVERAGE GOVERNMENT SCORE FOR CHILDCARE?

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Dear Reader,

The past 2019 was different from all previous years in which Report Card: What Is the Average Government Score for Childcare monitored the progress made by government institutions towards their commitments to ensure children’s rights.

For the first time since the original issue of the report back in 2011, the year 2019 not only failed to register any progress in the implementation of child and family policies in the country, but also reported a significant decline in the government’s policy for the child, which was particularly evident in a number of sectors.

We at the National Network for Children created the Report Card to be able to monitor the key responsibilities of the modern Bulgarian democratic state towards ensuring the rights of the child in line with the 1991 Constitution of the Republic of Bulgaria, the UN Convention on the Rights of the Child, as part of domestic law, and the relevant national legislation. Bulgaria has committed legally to respect and ensure those rights for every child within its jurisdiction, without discrimination and with the help of all appropriate legal, administrative and other measures related to exercising those rights. This approach poses a requirement for child participation at all levels and in all relevant decision making, thus empowering a gradual transition to active and socially significant adulthood. The latter is particularly important in today’s technological, interconnected, but also vulnerable world, in which ensuring children’s rights and the perception of children as individuals plays an integral role to their future lives as successful and happy adults.

Working for children’s rights is the most effective tool to guarantee their welfare. This includes family support, access provision to adequate resources and services for every child, social inclusion and development.

The rights-based approach does not, however, mean that children should be separated from their families. The National Network for Children has always closely monitored and backed all government policies in support of families, parents and other adult carers. There can be no doubt that the welfare of all children is dependent on their family situations, and that parents are, as a rule, the most suitable adults who can provide the necessary love, affection, care, protection and control for the development of each child. The state cannot replace parents when it comes to raising children – this lesson has been learned and is further confirmed by modern research. The fact is that there are numerous problems in the functioning of the child protection system and family support policies in the country, and we at the National Network for Children have worked for years, attempting to solve them so as to strengthen and empower the system.

It is precisely on this approach that is the base of the Child Protection Act, in force since 2001, the Pre-School and School Education Act, as well as the more recently adopted People with Disabilities Act, the Personal Assistance Act, the Social Services Act and other laws and strategic documents. Today, these legal frameworks, together with the policies on children’s rights, family support, and protection of children from violence, abuse and discrimination, are under threat.

At the same time, antagonising children, parents and families can have unsound, counterproductive and damaging consequences. Targeted attacks against the perception of children as people and individuals and against family support, the collapse of public trust in institutions, and the suspension of long-awaited reforms and policies pose a real threat to the possibility for every child in Bulgaria to enjoy the best life and development opportunities and for families to rest assured and supported in caring for their children.

We cannot claim to be improving technology, the economy, governance and justice while raising children without respect for their dignity and without caring for their development and rights as individuals. It is precisely through investing in children that we can ensure a high return on social development and good life of society.

George Bogdanov
Executive Director
National Network for Children
The National Network for Children would like to thank everybody who contributed to drafting the Report Card 2020: 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 Card.

We cannot omit to thank the young people, parents and professionals from all over the country – 141 people in total, who shared their opinions by completing the survey ‘Report Card: How Children, Parents and Professionals Evaluate the Government’.

We would like to express our appreciation to the child rapporteurs from the National Eurochild Forum in Bulgaria who, in the period January – December 2019, have interviewed their peers aged 10 – 18 from all over the country on topics, important to children.

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, Agency for Social Assistance, State Agency for Child Protection, and State Agency for Refugees, the International Organisation for Migration, Harmanli Municipality, Nadezhda Municipality, Krasno selo Municipality, who provided detailed information on the progress in the implementation of the commitments, and prepared responses to numerous requests for access to public information for the purposes of the Report Card.

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 2020: What is the Average Government Score for Childcare is the ninth consecutive annual report prepared by the National Network for Children. It assesses the enforcement of children's rights in the course of 2019 through the implemented government policies on the child and the family.

The main goal of the report is to carry out annual, independent evidence-based monitoring of the work of the government in the field of children's rights.

We have further provided recommendations, which we hope will facilitate the improvement of child and family policies and practices in Bulgaria.

The subject areas which our experts reviewed in order to analyse the progress in child policies and rights enforcement are: 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. The selected areas and sub-areas aim to ensure a comprehensive overview of children's rights and to evaluate all aspects of rights entitlement and enforcement. The purpose of the analyses is to guarantee integrity in the presentation of children's rights in the report, which focuses on structural and horizontal policies rather than on specific government commitments for the respective year. For the most part, we have adhered to three priority criteria: significance, relevance to the priorities of the member organisations of the National Network for Children, and resolution potential.

The choice of the areas and sub-areas included in Report Card 2020 is based on the principles of consistency, scope maximisation and relevance. On the one hand, this enabled us to dynamically monitor the government's management approach to certain challenges and to verify whether the action taken to rectify identified problems is consistent with the recommendations made the year before. On the other, it allowed us to highlight a concrete subject area that is both pivotal and exemplary of the state of play of ensuring children's rights in the country. Consequently, we have identified the serious departure from the care of children and families by the state in 2019 as this year’s highlight.

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

In the interest of fairness, the preparation of 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 objectivity of the evaluation, we also approached experts from ministries and agencies soliciting their assistance in collecting information on the progress made in the selected areas and sub-areas in 2019, as well as on the challenges faced and the plans to achieve the set targets. This detailed information was then used to prepare the analysis for each subject area. Other commonly used sources include: institutional reports, independent research and NGO papers, and media publications. As preparation took place in the course of 2019 and early 2020, all reported data refer to 2018 and 2019. Data which could not be accessed was supplemented by the latest available information on the overall state of play of the policy in question. The report provides clear referencing for all data and authorities informing the conclusions and grades in each subject area, thus also ensuring that the analysis is based on reliable sources rather than the subjective opinions of the National Network for Children.

Traditionally, the National Network for Children seeks to represent the views of children, young people, parents and professionals, which, together with the expert evaluations, are incorporated in a single report. The goal, as in any of the previous years, is to gain important insights into status of children's rights in the country based on their own opinions, as well as on those of their parents and supporters – teachers, health and social workers and others. Without any claim to representation or exhaustiveness, in early 2020 we approached 141 children and adults, who shared facts and opinions about their lives on issues such as health care, education, justice and family. In addition, the report includes authentic information based on children's opinions collected by the child rapporteurs in the National Eurochild Forum, Bulgaria (NEF). The complete information collected by the reporters and the subject areas they have covered can be found at www.nmd.bg.
Our task was to report on the situation and possible changes as regards ensuring children’s rights and child and family policies as evidenced in the government’s decision-making in its attempt to contain and permanently eliminate the problem and ensure a positive impact for children and families. We also remembered to praise all efforts and any positive development made, even in the absence of concrete results or in spite of partial policy implementation. A conscious effort was made to highlight achievements and identify positive trends in ensuring children’s rights, but not at the expense of sparing constructive criticism where such was due.

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

The method of evaluation in the report is similar to the one used in the education system, and is based on a six-grade scale. The assessment was originally done by experts, external evaluators, children, parents and professionals, and subsequently verified by the civil society organisations, members of the National Network for Children. The final grades are based on arithmetic averages of the scores awarded by the authors, external evaluators, children, parents and professionals in the sub-areas included in the eight subject areas in the report.

It is important to note that the evaluation scale used in the report is the one adopted in 2015. This means that the grades are based on a problem-definition approach, i.e. the nationwide state of play as regards ensuring children’s rights and child and family policies, the decisions made by the government in an attempt to contain and permanently eliminate the issue and ensure a positive impact for children and families.

The English version of *Report Card 2020* provides a summary of the original texts included in each subject area.

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**Key:**

Opinion of parents and professionals shared in the survey *Report Card – How Children, Parents and Professionals Evaluate the Government*

Rapporteurs – information of the children’s opinions collected in the framework of consultation, conducted by the child rapporteurs in the National Eurochild Forum, Bulgaria (NEF)
### GRADES, REPORT CARD 2020

#### SUBJECT AREAS

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#### AVERAGE GRADE, PREVIOUS REPORTS

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1. CHILD WELFARE

The grade in this subject area is Poor 2.50.

Government institutions and municipalities have failed to implement the necessary long-term, comprehensive and coordinated measures and policies to ensure the welfare of all children in Bulgaria. The worrying trend of high poverty and inequality rates having a particular impact on children remains in full sway. There are significant imbalances in family incomes and the impact of benefits is poor.

There is still no integrated approach between the various sectoral policies in support of parents, which hinders the potential positive effect of the fight against poverty and social exclusion of children. Moreover, 2019 was marked by a series of decisions to suspend key much-needed reforms to that effect.

2. PROTECTION OF CHILDREN FROM ALL FORMS OF VIOLENCE

The grade in this subject area is Poor 2.50.

Bulgaria was left without a National Strategy for the Child (2019 – 2030) after the government backed down to propaganda attacks against child policies in the country. This raises serious questions in terms of prevention, successful countering and coordinated institutional and professional response to violence against children. The government further failed to respond adequately to the heavy blow against the National Helpline for Children 116 111, which is the only available option for children to report cases, including of domestic violence.

Some slight progress was made as regards child victims of cybercrime and harassment with the maintenance of a specialised web portal for prevention and information where children can also report cases.

3. EARLY CHILDHOOD DEVELOPMENT

The grade in this subject area is Average 3.00.

No major progress was made in this area. The issues with the shortage of specialists and the lack of coordination between systems remained unsolved.

The adoption of the National Early Childhood Development Strategy was delayed. The postponement of the Social Services Act has limited the opportunities for children and families to use generally available services in accordance with their specific needs.

There are financial barriers to the inclusion of children in pre-school education in spite of the legislative reforms and investment made to facilitate access and improve the quality of early childhood education. A pressing issue carrying over from the previous years was the shortage of places in nurseries and kindergartens in larger cities.

4. CHILD HEALTH

The grade in this subject area is Average 3.00.

The construction of a National Children’s Hospital was put at risk as a result of serious doubts concerning the safety and functionality of the proposed building and the lack of a construction and management plan for the hospital.

There is a need for integrated services comprised of activities provided by the health, social and educational systems to address the complex needs of children and parents, including in the fields of child’s mental health and addiction prevention.

Despite the country’s efforts to reduce the infant mortality rate, it is still higher than the EU average. This is further aggravated by the absence of analyses and concrete measures to overcome the high rates in some cities and towns, as well as the disparities between urban and rural areas.
5. EDUCATION

The grade in this subject area is Good 4.00.

“Education is the highest-ranking subject area in Report Card 2020, which is due to the political will and the fulfilment of the government’s commitments. Nevertheless, no overarching concept exists for the development of education, with specific goals, policies and implementation in place, instead of the rather piecemeal approach that is currently favoured.

PISA 2018 results show a serious decline in the functional literacy of Bulgarian students compared to the previous assessment of 2015, resulting from an increase in the share of students scoring below the critical level 2 (practically functionally illiterate) and a decrease in the share of top performers.

Measures to raise teacher’s salaries are disconnected from measures to attract and retain young teachers in schools. The success rate of returning students to schools is disproportionate to the efforts made towards their reintegration and sustainable retention in the classroom. Inclusive education, albeit well developed on paper, does not lead to schools and kindergartens performing particularly well given the pronounced shortage of specialists and resources. There is a persistent understanding of digital media literacy as a separate subject, which is not integrated in all levels of education. There is no evidence of adequate health education taking place.

6. FAMILY ENVIRONMENT AND ALTERNATIVE CARE

The grade in this subject area is Average 3.00.

The deinstitutionalisation process continued in 2019, but the problems accompanying service provision in Family Type Placement Centres and the quality of child care there have remained unsolved and ignored.

The number of children living separated from their birth families has remained relatively constant. No progress can be seen in foster care and adoption and the positive developments in the protection and integration of unaccompanied and refugee children remain partial.

The postponement of the Social Services Act and the Strategy for the Child has practically led to an indefinite delay in the implementation of specific family support measures and measures for prevention of the separation of children from their families.

7. JUSTICE FOR CHILDREN

The grade in this subject area is Average 3.00.

Since 2011 the government has given conflicting signals regarding its willingness to reform the existing justice system for children, and no result has been achieved so far. The Ministry of Justice has not stated any future plans to take further the legislative process towards adopting and implementing the Deviation from Criminal Proceedings and Imposition of Correctional Measures on Minors Bill, nor has it given any hope for an upcoming repeal of the outdated Law on Combating the Anti-social behaviour of Minors and Underaged. Regardless of the steps taken and the commitments made to establish justice in accordance with the interests of the child, the involvement of children in proceedings governed by the Family Code remains unregulated and there is a lack of a unified methodology to examine, and respectively ensure the best interest of the child.

8. CHILD PARTICIPATION

The grade in this subject area is Average 3.00.

For yet another year child participation continued to be mostly formal, declarative and inconsistent with European and international standards. There is no clear and common understanding of its nature; the dominant attitude being that the child is an object of influence. Despite individual initiatives for child participation, no understanding and intention exist for an overarching targeted process to ensure this right.

Opportunities for receiving feedback and consulting children through digital platforms are not fully utilised. There are still no appropriate mechanisms to take into account the views of children in their interaction with institutions.
2019 was marked by a critical departure on behalf of the government from child rights and family support policies. For the first time, the government clearly and categorically refused to develop child and family policies through its decision to end the debate and work on the adoption of the National Strategy for the Child (2019 – 2030). This decision goes against certain legal requirements pertaining to rights entitlement arising from the Bulgarian Constitution, the UN Convention on the Rights of the Child and other domestic regulations, and is further specifically in breach of Article 1 (3) of the Child Protection Act. Moreover, the termination of the debate on the Draft Strategy for the Child was a definite sign of the government’s categorical suspension of any comprehensive policy planning of children’s welfare in the country – a result of a long process of deepening neglect, disregard and outright exclusion of the issue of children and general family support from the political agenda in the past 10 years.

This process can be evidenced by the gradual abandonment of the commitments undertaken in the National Strategy ‘Vision for Deinstitutionalisation of Children in the Republic of Bulgaria’, adopted in 2010, according to which the family and the right of the child to be raised in one is a key value. One of the measures for achieving the strategy’s goals was “Adopting an overarching concept for the welfare of all children and full guarantee of their rights”. In addition, having withdrawn from the public debate, in 2012 the government further failed to secure support for its draft Child Act. The refusal to plan and implement child policies in 2019 was also manifested and solidified in the abandonment of several developed bills – the Bill on Amendment and Supplementation of the Family Code (2016) and the Bill on Deviation from Criminal Proceedings and Imposition of Correctional Measures on Minors (2018) – which were the result of a commitment to reform the child justice system made back in 2012. In December 2019, on its last working day, the National Assembly postponed the
entry into force of the Social Services Act, despite the Bill’s unanimous adoption, without a single ‘against’ or ‘abstained’ vote, in March of the same year. This meant another delay of a system reform which would have ensured support for children and developing universal services for parents, as well as for all vulnerable groups, such as the elderly, people with disabilities and others.

As a result, unresolved problems and sectoral crises tended to aggravate, as could be seen from the gradual exit of experienced and qualified professionals (social workers, child psychologists and pedagogues) from the child protection system, due to their low pay, poor working conditions and misadministration. This led to a lowering of the qualification criteria for those entering the system, inconsistent funding of protection and family support measures, lack of legislative and government-led initiatives to ensure sustainability, efficiency and control over pilot projects, and lack of comprehensive, real and effective support for all families. All of this halted the development of the protection system and its capacity to respond to changes in social conditions and family expectations, i.e. from one working with vulnerable children to one serving children in parental conflict, cases involving foreign nationals, refugee and migrant children etc., against its deteriorating capacity. In addition, a massive fail of government institutions was the absence of any campaigns to inform the public, families and parents of the purpose and means of ongoing policies.

This extensive list, which encompasses several areas of children’s and families’ lives, such as social protection and services, family policies and justice, testifies to the government’s managerial and professional inability to complete key and much-needed reforms in child policies, but mostly to the lack of political will and interest in this field of public life, as seen in, among others, the systematic refusal to implement already regulated policies, coupled with ambiguity and a general sense of social injustice. Thus, the inadequate and ineffective implementation of child and social legislation and family support policies in the past 10 years led to a serious decline in public trust in government institutions as regards the implementation of child and family policies, and also validated the perception that government institutions are not seen as beneficial to parents, but as rather indifferent to the need for support, and sometimes even mainly resorting to punitive action. This can be seen also in the steady downward trend in the number of reports of violence against children in the period 2015 – 2018.

The decision to ‘postpone’ the Strategy without clarity as to for how long, and without any justified reason practically put at high risk the children whose rights are most vulnerable, as well as all family support policies in the country. Moreover, this decision legitimised the messages sent by the attacks on children’s rights, which targeted precisely the view of the child as an individual and a person. Thus, 2019 was also very intense in mass-scale and unprecedented propaganda and misinformation, fuelled by political and religious goals, spread without any major blockage mostly through social media. The campaign further had some ill-concealed political objectives, which became apparent from the increased social media activity and petitioning in the midst of the European elections campaign, when the distribution of materials also intensified. A similar trend, spreading the same messages but this time against the Social Services Act, resurfaced before the local elections of October 2019.

Instead of counterfighting this propaganda, informing the public and addressing parents’ and citizens’ fears and planning urgent action to improve the institutional framework and mobilise more qualified specialists to carry out measures with a positive impact on the situation of children and their families, decision-makers remained silent for a prolonged period, before turning the issue of children’s and family’s rights into a populist subject, especially during the pre-election period. In the course of this active propaganda campaign, fake news and the call to suspend policies concerning children’s rights and family support were picked up by various political parties.

In addition to their lowered trust in government institutions, captured by opinion polls in recent years, parents and communities became further dismissive of institutional measures, which created favourable conditions for the spread of propaganda and fake news.

Tension escalated and in October 2019 the situation got out of control when parents in many different parts of the regions of Asenovgrad, Sliven and Yambol refused to let their children go to school for fear of being taken by ‘the socials’. Members of the National Network for Children reported cases of children not being allowed to the dentist, as parents feared that they might be ‘taken’ on grounds of unattended cavities, and even cases of domestic violence in which the Child Protection Department dared not intervene due to the pressure exerted and the possibility of the story being manipulated.

SERIOUS DEPARTURE FROM THE CARE OF CHILDREN AND FAMILIES BY THE STATE IN 2019 11
Populist decision-making and the absence of vision and leadership in child and family policies were further confirmed by a number of events and initiatives in the course of the year which the government refused to commit to and develop, even when it was a participant or co-organiser.

Last but not least, 2019 was marked by targeted attacks against organisations working with and for children and families. Those were particularly harsh against organisations having taken a public stance in defence of children’s rights and family support policies, including during the long-lasting inaction of the government. The institutional lack of response to the spread of libel statements and fake news, to attempts to hinder the work of organisations supporting specific cases of children in need, and even to calls to take the law into peoples’ own hands and turn to violence was a further check to the political will of the government to respect and enforce the law and its commitments to children and families, but also to the fundamental civil rights in a democratic state.

As of February 2020, we were not aware of any planning intentions on the part of the government as regards its child protection policy and family support policy. This poses significant risk in terms of both the ongoing downturn in child and family policies, which will ultimately impact the future respect for children’s rights and interests, and the implementation of urgent child protection measures in specific cases today.

“The problems of children are numerous and diverse, we want to know that there is somebody we can rely on, who will support and understand us, who will listen to us, who will provide us with the opportunity to change the surrounding environment. Or we will simply move to another country where more development opportunities are available.”

RECOMMENDATIONS

- Plan, finance and conduct ongoing information campaigns in the national media and social platforms on the policies ensuring the rights of the child and family support, and taking into account the commitments made by the State through a legal reporting progress;
- Draft clear plan for the adoption of the Strategy for the Child involving all stakeholders (government experts, experts from the civil sector, parents, children), to plan the government policy with respect to the rights of the child and family support;
- Restore the capacity of the child protection system though vocational training of its staff and those entering the labour market, decent pay and working conditions;
- Introduce clear indicators to monitor the implementation of all adopted strategies, affecting the rights and the welfare of children;
- Investigate the sources of propaganda and misinformation and take action to hold their initiators accountable.
1. CHILD WELFARE
For years, the phenomenon of ‘risk of poverty and social exclusion’ among children has been at alarmingly high levels (over 400,000 every year), thus leading to violation of their fundamental rights, hindering their opportunities to reach their full potential, and hence making a positive contribution for the future of Bulgaria.

Social exclusion of children with disabilities and children with chronic and rare diseases continues to be very strongly pronounced.

According to children,

“There are schools where children suffer discrimination by their peers and teachers, also on the grounds of their ethnicity or beliefs.”

Demographic situation, child poverty and social exclusion

“The share of people in Bulgaria who are on the brink of survival is quite large.”

The total number of children in Bulgaria in 2018 was 1,254,863.

Every third child in Bulgaria lives at risk of poverty, and this has been a steady trend over the last decade. In 2018, 26.6% of children aged 0 – 17 in Bulgaria were at risk of poverty, which is by 2.6% less than in 2017.
Regarding the combined indicator ‘risk of poverty and social exclusion’, the data show that in 2018 some 33.7% of children aged 0 – 17 years in Bulgaria have lived in such a risk, which is by 7.9% less than the previous year. The risk of child poverty and social exclusion in Europe is around 21%. Child poverty remains a problem for all EU Member States, with some of the countries in Central and Eastern Europe, the Baltics and the Mediterranean being most affected.

In 2018, the highest relative share of the poor was among the people who identified themselves as Roma – 68.3%, and the lowest – among the people who identified themselves as Bulgarians – 15.6%.

The parents’ educational level and profession is an important factor for the future development of their children. Higher level of education allows for wider access to the labour market and, consequently, higher pay. In 2018, seven out of ten children (70.7%) whose parents have elementary level or no education have lived in poverty. Approximately 15 times less, or 4.6%, is the proportion of children whose parents have higher education and live at risk of poverty. The risk of poverty for children in households with parents having secondary education is five times higher than that for children with parents having higher education.

In 2018, Bulgaria continued to show a permanent negative growth (-7.1 ‰). 62,576 childbirths were registered in the country, of which 62,197 (99.4%) were live births. Compared to the previous year, the number of live births decreased by 1,758 children, or by 2.7%.

Social transfers failed to make a significant contribution to reducing the risk of child poverty and once again evidenced the need to develop policies to increase family incomes from decent parental employment, policies for early childhood education and care and universal family services, as well as achieve better institutional cooperation, centred on the child interests.

The social exclusion of children with disabilities and children with chronic and rare diseases continues to be very much evident due to years of delay of the comprehensive reform of policies and practices for children and people with disabilities, as well as because of the lack of adequate social services for them and their families. We are witnessing an already common phenomenon among the families of children with disabilities and chronic diseases – moving to live in other country for health reasons. Many families move to other European countries to receive adequate treatment and support for their children, as well as due to the more user-friendly system of social and educational support.

In 2018, one third of the children (34.3%) cannot afford a holiday away from home for at least one week in the year (including holidays with family, visiting relatives, friends, organised school holidays, etc.); regular swimming lessons, playing a musical instrument, participation in youth organisations, etc.

For one in four children it is not possible to provide for purchase of age-appropriate books (excluding textbooks and teaching aids) and of two pairs of proper size shoes depending on the season and/or all-season shoes.

Demographic situation and policies

Sports, culture, leisure time of children

“... In places other than the big cities, very few children have access to sports, culture and recreation. And in big cities, such opportunities are highly dependent on the income of parents, and where it is low, children have no access.”
The measures taken at the state and municipal level, and aimed at improving the physical and mental capacity and the meaningful leisure time of children rely mainly on project funding; they are not strategically interrelated, there are no data to what extent they have managed to cover the most vulnerable groups of children, nor is there an analysis of the effectiveness and efficiency of the funds utilised during the year. There is no information on the quality of the services provided, whether they are accessible to all and how many children and young people have been involved in them.

There is a positive development on the part of the government to develop centres that provide leisure time services to children and young people, for which short-term funding is provided. However, there is no vision and concept of how the activities of these centres will be transferred to the level of a smaller municipality or village, where opportunities for children and young people are very much limited.

Securing and modernising playgrounds

It remains unclear to society how public funds are allocated for playgrounds construction and maintenance, and the care for them is reactive rather than proactive.

Hence, it is a matter of personal initiative, effort and donations for the playgrounds in kindergartens and schools to be ‘in line’ with the development of modern children and their needs.

Eye-catching facilities and planned spaces are still rare, even in the newly built kindergartens. There are no facilities suitable for children with disabilities. Especially in the smaller settlements, the design of the playgrounds is mostly the uniform, they are made by the same manufacturer, with the same concept for the equipment (swing, slide). Rope bridges and pyramids, balance elements, water facilities, construction facilities, climbing hills, springboards, flower or vegetable gardens, sensory paths, etc. are rarely seen.

The school yards in Bulgaria are used mainly for classes in physical education, however they are not adapted for free play for all children, nor do they offer a variety of activities and opportunities for open classes. The school yards are often neglected because their location in the school, which does not encourage active physical exercises.

Reconciliation between private and professional life of parents

Policies to support the performance of the parental functions should be always in the focus. Opportunities to spend quality time together is key to building a bond and meaningful relationships between children and parents and to family safety.

In the context of the opportunities of parents of young children to combine their parental functions and employment, it is important to point out to the findings of the EC report for 2019 that in Bulgaria the very low enrolment rate of young children in formal childcare continues to be a challenge. According the report data only 9.4% of children aged 0 to 3 are enrolled in formal childcare, significantly below the EU average of over 30%. It is due to the significant shortages of nurseries and/or other alternative forms and appropriate arrangements for child daycare, and this situation translates into poor labour market outcomes for young women.

9.4% of children 0 to 3 are enrolled in nurseries
(According the National Statistical Institute (NSI) data – 16.6%)

EU average
> 30%

The reason for the big discrepancy between the data in the European Semester report and the NSI data is not clear, as the NSI data show no difference whatsoever between 2017 and 2018, namely 16.6%. In both cases, however, Bulgaria remains well below the EU average.
RECOMMENDATIONS

- Synchronise child welfare and family support policies both horizontally (between the ministries involved) and vertically (between ministries and municipalities);
- Create conditions to open and provide universal generally available social services for children and families;
- Improve the responsibility mechanisms at the municipal level to implement effective community-based support and services for children with disabilities;
- Provide opportunities for respite care, including hourly care for children with disabilities, so that parents can take care of the documentation or get some rest;
- Encourage the drafting of municipal strategies for the development of activities for young people and children, including sports and leisure activities, which provide an opportunity especially for disadvantaged groups, as well as for children and young people at risk;
- Government support and funding for civil society organisations that can be a ‘providers’ of non-formal learning and leisure time initiatives for children and young people in the whole country;
- Government institutions and municipalities to encourage and provide opportunities for free play on the playgrounds in gardens and schoolyards. Active collaboration with parents and children in the construction and maintenance of these places, in line with the statutory regulations;
- Encourage employers to take additional measures for providing balance between the personal and professional lives of both mothers and fathers, including by creating a child-friendly environment that allows employees to be close to their children: kindergarten, part-time daycare, safe office space/space for children, flexible working hours and remote workplaces for parents;
- Programmes to motivate and encourage employers for more flexible employment schemes for parents with children who attend nursery, kindergarten or elementary school.
2. PROTECTION OF CHILDREN FROM ALL FORMS OF VIOLENCE
In 2019 the government made an unsuccessful attempt to optimise the joint work of all institutions and other stakeholders in cases of child victims or children at risk of violence.

The supplementary provisions to the adopted Social Services Act, contain a text amending the Child Protection Act (CPA) which should regulate the Coordination Mechanism for the work of the multidisciplinary team in cases of / or for prevention of violence against children. Unfortunately, the departure from the entry into force of the Social Services Act has led to exacerbating the crisis in the provision of quality support to child victims of violence, or in the prevention of such violence.

According to preliminary data from the Ministry of Interior (Moi), the total number of crimes against children in 2019 was 2,268, with 1,022 against minors (under 14) and 1,246 against minors (14 – 18).

### According to data by the General Directorate “National Police”

- **Homicide (committed)**: Total number 2, Homicide (attempted): Total number 0
- **Debauchery**: Total number 152, 116 MINORS (under 14), 36 MINORS (14 – 18)
- **Rape – committed**: Total number 35, 13 MINORS (under 14), 22 MINORS (14 – 18)
- **Rape – attempted**: Total number 1, 1 MINORS (under 14), 0 MINORS (14 – 18)
- **Pandering and abduction for debauchery**: Total number 14, 11 MINORS (under 14), 3 MINORS (14 – 18)
- **Forced homosexual actions**: Total number 8, 5 MINORS (under 14), 3 MINORS (14 – 18)
- **Bodily injury**: Total number 279, 93 MINORS (under 14), 186 MINORS (14 – 18)
- **Kidnapping and illegal imprisonment**: Total number 15, 8 MINORS (under 14), 7 MINORS (14 – 18)
- **Hooliganism**: Total number 64, 22 MINORS (under 14), 42 MINORS (14 – 18)
According to data from the National Helpline for Children (NHC) 116 111, family is the place where children are most violated against – 463 reports, on the street – 85, at school – 20, the number of child victims of violence in institutions is 12, in adoptive family – none, in kinship care – 21, in a public place – 26.

**Number of reports by place where the violence was committed in 2019:**

<table>
<thead>
<tr>
<th>Place</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Family</td>
<td>463</td>
</tr>
<tr>
<td>On the street</td>
<td>85</td>
</tr>
<tr>
<td>At school</td>
<td>20</td>
</tr>
<tr>
<td>Institutions</td>
<td>12</td>
</tr>
<tr>
<td>Adoptive family</td>
<td>0</td>
</tr>
<tr>
<td>In kinship care</td>
<td>21</td>
</tr>
<tr>
<td>At public place</td>
<td>26</td>
</tr>
</tbody>
</table>

Violence in specialised institutions for children continues to be a fact and is manifested in various ways – from physical abuse to psychological harassment. Data on such cases exist, including on cases that have been made publicly known. There are data concerning children with disabilities who were also victims of domestic violence, but these data do not get publicity.

In 2019, an International Conference on the prevention and elimination of violence against children was held, co-organised by the National Network for Children, together with the Ministry of Labour and Social Policy, the State Agency for Child Protection, UNICEF, the World Health Organization (WHO), Child Protection Hub, supported by Terre des Hommes and a number of other non-governmental organisations and leading experts – members of the ‘Childhood without Violence’ National Platform. The scale of the spread of violence against children around the world and the INSPIRE Seven strategies for ending violence against children, which were translated and adapted, as well as their relevant indicators, were presented at the conference. Unfortunately, the government’s willingness to consider and adopt these strategies remained nonexistent.

**The INSPIRE: Seven strategies for ending violence against children aged 0 to 18**

- Implementation and enforcement of laws
- Norms and values
- Safe environments
- Parent and caregiver support
- Income and economic strengthening
- Response and support services
- Education and life skills

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

The topic of preventing violence and supporting victims of domestic violence continued to be under serious attack in 2019. After the Bulgarian Parliament did not ratify the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence in 2018, in 2019, the draft Strategy for the Child (2019 – 2030) was placed under a serious attack. The prevention and protection of children from violence was one of the strategic goals in the aforementioned Strategy for the Child.

The topic of child welfare, support for parents and protection from domestic violence was replaced by a non-existent threat of taking children from their families, which gained public popularity through an active misinformation campaign, leading to the stopping of the draft Strategy for the Child.

In addition, there was a heavy blow against the National Helpline for Children 116 111, which is the only available option for children to report cases, including of domestic violence.

And again in 2019, ensuring financial and human resources for measures and programmes for prevention and support of child victims of violence remained a serious challenge.
There are still not enough in count and available universal and specialised services for children who have experienced violence. In most of the regional centres there are no placement services for victims of violence. Several crisis centres continue to operate in the country, with most of them working at full capacity and not being able to meet all needs.

**Violence at school**

In 2019, there was no official government document that would indicate any government commitment to combating school violence and bullying.

At school/kindergarten level, most often the counteract measures to violence and bullying are assigned to the psychologist or the pedagogical counsellor, but their number is very much insufficient – currently one staff position for a psychologist is granted per 350 enrolled students. There are also schools and kindergartens that have teams of professionals, involving also the teachers in the process of combating violence and bullying, but those are still too few. The experts dealing with the problem are not provided with a regular supervision, although this option is specifically mentioned in the statutory documents. This could be explained with the lack of human resources in the education system (there are no trained supervisors for case supervision) and the lack of opportunities or unwillingness to pay for supervision by external to the education system supervisors.

Together against violence in schools programme is under development in partnership with UNICEF Bulgaria (according to the Ministry of Education and Sciences). The programme is still a draft and its actual implementation may start in 2020.

**Child Neglect and Abuse in Cyberspace**

Not enough resources (both human and financial) have been committed by the responsible Bulgarian institutions to guarantee more effective mechanisms for the protection of children online.

According to a survey conducted by the Bulgarian Safer Internet Centre on the Internet use by children under 8:

- 75% of children under 8 have access to the Internet;
- 40% of children under 2 have used a smartphone;
- 13% visit social networks for children;
- 7% visit social networks for adults;
- YouTube is the second favourite website for children under 5;
- At the age between 3 and 4, children start playing online games.

In 2019, the Bulgarian Safer Internet Centre shared survey results, according to which over 73% of children under this age already have their own account, usually made together with a parent, incl. with false age data, which places the child at additional risk.

Among the positive developments in 2019 is the adoption of the amendments to the Personal Data Protection Act (SG No. 17/26.02.2019), where in Art. 25c, is preserved the lowest possible age provided for in Regulation (EU) 2016/679 as regards the lawfulness of processing data of persons under 14, and for using the information society services shall be required the consent of the parent with the parental responsibility or the legal guardian. Of course, the problem of protecting the rights and interests of children in the age group 14 – 18, and the development of effective mechanisms for their protection remains open.

The main efforts to prevent child neglect and abuse in cyberspace continue to be an initiative only of the civil society organisations. In 2019, the fifth season of the Cyberscout Training Programme was organised (an initiative of the Bulgarian Safer Internet Centre with the Applied Research and Communications Fund and the Parents Association), and by July two-day trainings were delivered to nearly 1,500 fifth-graders from different settlements in the country.

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**Internet use by children under 8**

- 75% of children under 8 have access to the Internet
- 40% of children under 2 have used a smartphone
- 13% visit social networks for children
- 7% visit social networks for adults
- YouTube is the second favourite website for children under 5
- At the age between 3 and 4, children start playing online games

Source: National Health Insurance Fund
RECOMMENDATIONS

- Develop a unified information system for recording and monitoring of cases of violence against children;
- Analyse the effectiveness of the implementation of the Coordination Mechanism for cooperation on cases of child victims of violence or children at risk of violence, and take specific measures to overcome the identified difficulties and challenges;
- Open social services for providing protection and support to child victims of violence in each regional centre;
- The government, represented by the Ministry of Education and Science, and the Ministry of Labour and Social Policy, to make specific commitments for combating school violence and bullying, through clearly defined and measurable result indicators;
- Identify the school structures that are related to the problem of violence and bullying, with clear instructions for action (specifically with regard to school commissions for combating/preventing anti-social behaviour);
- Provide conditions for psychological support and assistance in school by appointing more psychologists and clearly defining their role in school;
- It is necessary for the practice of systematic supervisions for professionals working on cases of violence against children to become mandatory and to be provided with human and financial resources;
- Create efficient legal, information and practical mechanisms at the level of government authorities for control and prevention of online child abuse;
- Undertake actions by introducing specialised classes as ongoing training for all school-age children with a view to building a culture of online behaviour;
- Organise, where necessary, specialised training for persons working in the investigative bodies for immediate assistance in cases of child victims or at risk of violence.
3. EARLY CHILDHOOD DEVELOPMENT
There has been no significant progress in this area. The problems with the shortage of specialists and the lack of coordination between the systems remain.

The adoption of the National Strategy for Early Childhood Development is delayed. The postponement of the Social Services Act has limited the chances of children and families to benefit from generally available services, in accordance with their specific needs.

The importance of early childhood development (ECD) is so significant that it is included in the UN Sustainable Development Goals, thus confirming its growing importance as part of the global development agenda. The second target of sustainable development goal 4 is “by 2030, ensure that all girls and boys have access to quality early childhood development, care and pre-primary education so that they are ready for primary education”.

In 2019, continued the work of the interinstitutional working group at the Ministry of Education and Science established in 2018 to prepare “a draft National Early Childhood Development Strategy and its justification”. Despite hopes that the active work will continue, followed by communication with an even wider range of stakeholders, the working group remained inactive until the end of 2019.

This left with no political commitment some key proposals of the leading NGOs in the field of early childhood development, the implementation of which would have improved the protection, security and safety of young children. These proposals include: “Develop and finance a sustainable home visiting policy to develop parental skills for nurturing early childhood care, providing enhanced support for the most vulnerable children and their families.”

Another proposal was made to improve the skills and knowledge of health professionals working with young children on the psychological needs of the new-born and their family, through the design and delivery of training courses and inclusion of early childhood development in the compulsory curriculum of all medical universities and colleges. This proposal is particularly relevant in the context of the Council of the European Union Recommendation on High-Quality Early Childhood Education and Care Systems, adopted by the Council and its ‘Quality Framework for Early Childhood Education and Care’. The second area of quality in the Framework is focused precisely on the professionals in the field of early childhood education and care. The adoption of this Recommendation in May 2019 marked the beginning of the systematic work of the EU Member States to pursue not only quantitative targets for the coverage of children in early childhood education and care (ECEC), but to meet also some quality goals so that national policies would contribute to the harmonious development in the first years of every child’s life, and thus invest in human capital to meet the EU goals for the coming decades.

The challenges for Bulgaria in the field of early childhood are numerous: access to health care; barriers to inclusion and inclusive education at a practical level, regardless of existing legislation; insufficient facilities for early years education; uneven planning of community-based services; lack of sustainability of some services; ensuring access and quality of services; shortage of specialists in key areas, as well as lack of knowledge and skills of professionals to work effectively to promote early childhood development.
As of 31 January, 2020, the government had no summarised data on the state of maternal and child health indicators in the past 2019. This, in itself, is a sign of failure to meet one of the measures laid down in the National Program for Improving Maternal and Child Health 2014 – 2020 (NPIMCH). The submitted data show that for the first 9 months of 2019 in the Health Consultation Centres established under the NPIMCH, on average, less than one consultation per day was provided. More than half of the health uninsured pregnant women did not receive their due examination by an obstetrician-gynaecologist, and medical-diagnostic tests were performed for about 1/5 of the health uninsured pregnant women during the year. About 16,900 biochemical screenings were also reported, which roughly corresponds to about 40% of all pregnant women for the period.

"It is necessary to introduce more adequate monitoring of pregnancy, to radically change delivery practices, there is a need for home visiting care in the first year after birth. Nurseries and kindergartens need more staff and reduced number of children in groups so that child early learning and development to be truly effective."

### Staffing

According to the Bulgarian Medical Association and the Bulgarian Association of Healthcare Professionals in 2019 in Bulgaria there were about 1,400 obstetrician-gynaecologists and 3,800 midwives. A serious problem is the high average age of midwives – 53 years – as well as the uneven distribution of specialists: in the regional centres of Razgrad and Yambol, for example, there are only one or two obstetrician-gynaecologists and 25 – 26 midwives.

The intended policy for improving the access to qualified care for pregnant women and children has not only failed to be implemented, but its indicators deteriorated due to short-sighted policy and not assessing the risk of aging and decreasing in number competent staff.

### Child and Maternal Health

<table>
<thead>
<tr>
<th>Category</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Obstetrician-gynecologists</td>
<td>1,704</td>
</tr>
<tr>
<td>Midwives</td>
<td>3,155</td>
</tr>
<tr>
<td>Total number of child births</td>
<td>55,048</td>
</tr>
<tr>
<td>Child births by health uninsured pregnant women</td>
<td>7,179</td>
</tr>
<tr>
<td>Stillbirths</td>
<td>318</td>
</tr>
<tr>
<td>Live births</td>
<td>57,015</td>
</tr>
</tbody>
</table>

### Traceability system for premature infants in Bulgaria

By 2019 in Bulgaria there were still significant shortcomings in the field of comprehensive monitoring of premature babies, which is evidenced by the absence of sustainable and regular monitoring by medical professionals in the first seven years after their discharge from the neonatology ward, and in their monitoring by non-medical professionals working in the field of early childhood development. In this regard, in May 2019 a draft National Programme for monitoring of premature babies aged 0 to 7, coordinated and supported by the Bulgarian Association of Neonatology, the Office of the WHO in Bulgaria, the Modern Maternity Care Network and the National Network for Children was submitted to the Ministry of Health.

In February 2019, Our Premature Children Foundation conducted a quantitative online survey among parents of premature children in Bulgaria. The aim of the survey was to investigate the access to services for late monitoring for premature infants after discharge from the neonatology ward. The study involved 812 parents of premature infants, 46.3% of whom were parents of children born under 1,500 g, of whom 26% – under 1,200 g.

**According to the data of the Regional Health Inspectors, the neonatologists are 149.** The availability of neonatologists is 2.1 per 100,000 population.
Nutrition

The main unfavourable characteristics of infant nutrition in Bulgaria include: late start of breastfeeding; low frequency of exclusive breastfeeding; short duration of breastfeeding – an average of 3 months; giving to the infants sweetened water and early adding of fruit juices to the diet, which prevents successful breastfeeding; low nutrient density of a number of micronutrients in the solid foods. A serious problem in children aged 6 – 12 months is the high incidence of anaemia – 41.8%. Children with anaemia have a significantly higher incidence in delayed growth, underweight and a higher incidence of acute respiratory diseases. The incidence of overweight increases already from early childhood.

Early childhood education

A pressing issue continuing from the previous years is the shortage of places in nurseries and kindergartens in larger cities. There are financial barriers to the inclusion of children in pre-school education, in spite of the legislative reforms and investments made to facilitate access and improve the quality of early childhood education.

Early education is implemented in nurseries and kindergartens. As of the end of 2018, in the country there were 840 stand-alone nurseries and nursery groups in kindergartens, where 31,939 children were educated. The coverage of children under 3 in nurseries is 16.6% (According to NSI data). This trend is most worrying for children with mother tongue other than Bulgarian. The measures taken to finance the costs of fees for attending kindergartens and additional training in Bulgarian for children with mother tongue other than Bulgarian should be upgraded with measures to improve the quality of care and education in all childcare facilities in the country.

The number of children enrolled in kindergartens in the 2018/2019 school year was 218,767, which represents 78.4% coverage of children in the age group 3 – 6.

Online survey among parents of premature children in Bulgaria

February, 2019

<table>
<thead>
<tr>
<th>Percentage</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>46.4%</td>
<td>did not receive a schedule for the necessary examination in the first year</td>
</tr>
<tr>
<td>84.7%</td>
<td>did not receive information about the need for monitoring of the child development after the age of 2 as well</td>
</tr>
<tr>
<td>55.5%</td>
<td>paid for all the examinations required for their children</td>
</tr>
<tr>
<td>42%</td>
<td>travelled to a different settlement for examination of the child due to the lack of specialist in their town</td>
</tr>
<tr>
<td>58%</td>
<td>their children have never been given a comprehensive development assessment</td>
</tr>
<tr>
<td>1.8%</td>
<td>their child had a comprehensive development assessment after the age of 5</td>
</tr>
</tbody>
</table>

Early Education Coverage in late 2018

<table>
<thead>
<tr>
<th>Age Group</th>
<th>Coverage</th>
<th>EU Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aged 0 – 3</td>
<td>16.6%</td>
<td>34%</td>
</tr>
<tr>
<td>Aged 3 – 6</td>
<td>78.4%</td>
<td>95%</td>
</tr>
</tbody>
</table>
Early childhood intervention

As of 2019, there were 62 municipalities providing early childhood development services aimed at prevention of social exclusion, reducing child poverty through investments in early childhood development, aimed at children aged up to 7 from vulnerable groups, including children with disabilities and their families, as well as parents-to-be. The funds necessary for the operation of these services are available under the ‘Human Resources Development’ Operational Program until the end of 2020, and after the project completion, funding is expected to be provided by the state budget.

The Social Services Act adopted in 2019, and postponed with no justification by mid-2020, introduced a legal definition of ‘Early intervention for child disabilities’, which laid down the need for support actions targeting not only children but their families as well.

Of particular importance for the development of early childhood intervention (ECI) in Bulgaria are the services provided by several non-governmental organisations that have adapted some ECI models to the Bulgarian context.

At national level, the development of ECI services should be provided with the necessary legislation and finances to build a general national system through which to ensure full coverage with ECI services for all children and families in need.

Child protection, security and safety

As of 31 December, 2019, there were 13 Homes for Medical and Social Care (Infant Homes) in Bulgaria, with a capacity of 1,155 places, including the capacity for daycare centres and premature wards. The number of children placed in residential care was 426, of whom 256 were aged 0 to 3 and 170 were over 3 years old. 406 are children with disabilities and 20 are healthy.

In order to get a clear picture of the child protection for children under 3 years of age, it is important to have data on these children available at the municipal, regional and national levels. These data should take into account the care that children receive from the moment of discharge from the maternity ward until the age of 7, as well as their development.

The practice of demolishing illegal houses and evicting families without providing alternative accommodation and without special support for mothers and children remains of particular concern; poor housing conditions that affect the health of children from poor families (lack of running water, sewerage, etc.); high levels of air pollution in a number of neighbourhoods due to the burning of household waste, which has the most adverse effect on children’s health. For these reasons, the development of plans for regulation and improvement of the infrastructure of Roma and isolated neighbourhoods continues to be on the agenda as an aspect of the issue with child safety. Until these issues are resolved, measures are needed to protect families with children and pregnant women in case of evictions and demolition of houses. The need for an adequate housing policy at the local level is often associated with one of the factors for the separation of the new-born and the family, or the family breakdown.

RECOMMENDATIONS

- Extend the implementation period of the National Program for Improving Maternal and Child by 10 years until 2030;
- Develop and adopt a unified national methodology for the work of the Integrated Centres for Maternal and Child Health in the country;
- Create a detailed and accurate database for the service users in the Maternal and Child Health Centres – for children by different indicators: age, diagnoses, etc., for pregnant women by types of screening, etc.;
- Adopt a standardised approach to care, providing comprehensive monitoring of the health and development of premature children from 0 to 7 years of age, in order to ensure timely prevention and treatment of conditions characteristic of premature infants;
- Introduce a model of family-focused and development care in neonatology wards, which seeks to empower families in the care for babies from birth, as well as to take into account the complex needs (medical, psychological, developmental) and individual features of each baby in the process of their recovery;
→ Create a coordination mechanism for tracing children with disabilities and developmental problems – between hospitals – GPs – social services;

→ Improve breastfeeding practices in hospitals with neonatology wards and plan and systematically implement national campaigns in support of breastfeeding;

→ The elimination of kindergarten fees, especially for children in compulsory pre-school age, would sharply reduce the numbers of children not covered by pre-school education;

→ Provide enough vacancies in all-day care and education in nurseries and kindergartens;

→ Introduce a universal early child development screening to detect early developmental delays and deviations, recognized and applied by all systems that have contact with the child at an early age;

→ Create a National Register where to summarise data on children with disabilities and chronic diseases and developmental difficulties, with statistics on age, place of residence, types of diagnoses and opportunities to connect children with the available services;

→ Unify the methodology for provision of ECI services and develop a standard for services and staff, by using the by-laws to the Social Services Act;

→ Upgrade the professional competencies of the specialists working in ECI services, both in terms of early childhood development and in terms of the methodologies for service implementation and collaboration with the parents in line with a family-focused model;

→ Conduct an information and advocacy campaign to raise awareness of municipalities and the general public about the general and specialised services for young children and the civil society role in their development and provision.
4. CHILD HEALTH
**CHILD HEALTH**

**AVERAGE 3.00**

There is a need for integrated services comprised of activities provided by the health, social and educational systems to address the complex needs of children and parents, including in the fields of child’s mental health and addiction prevention.

**Vaccination**

In 2019, the Bulgarian National Immunisation Schedule was updated, which resulted in some changes coming into force in 2020 – for example, the reduction of Pneumococcal conjugate vaccine (PCV) for children under 6 months from three to two doses, abandonment of the Mantoux test and revaccination against tuberculosis of children aged 11, introduction of revaccination against pertussis of children aged 12, and adding the chickenpox vaccine to the list of recommended vaccines.

Unfortunately, the Ministry of Health has no effective mechanisms to control the implementation of the national Immunisation programmes by the GPs.

According to information from the National Network of Health Mediators (NNHM), there are cases where general practitioners refuse to give recommended immunisations (against cervical cancer and rotavirus), as well as isolated cases where GPs do not give vaccines from the mandatory schedule (one of the cases was reported to the Ministry of Health and the National Health Insurance Fund, followed by inspections, which established failure to vaccinate against measles and the doctor was sanctioned).

Establish the model of health mediators as a precondition for improving the access to health care for vulnerable groups.

In 2019, the health mediators network expanded by 15 positions, with 245 positions for health mediators approved in 130 municipalities. In 2019, after many years of advocacy by the team of the National Network of Health Mediators and NGOs supporting the model of health mediation, the activity of health mediators was included in the Health Act (Article 29), which highlighted the key role that health mediators play in implementing health prevention policies and facilitating the access to health care for vulnerable groups at the local level, thus helping municipalities and doctors.

**National Multidisciplinary Paediatric Hospital**

As of now, Bulgaria is the only European country without a National Paediatric Hospital. The construction of a National Children’s Hospital is at risk due to serious doubts about the safety and functionality of the selected building, and the absence of a construction and management plan for the hospital.

**Children’s Mental Health**

In the past year, the Ministry of Health did not propose any programme for prevention or early diagnosis of mental health conditions in children and adolescents. Good practices were discontinued, such as the practice of training professionals in skills for early detection of signs indicative of an autism spectrum disorder.

In practice, the detection, referral and therapy of psychiatric disorders in children are taken over by nurseries and the structures of the Ministry of Education and Science – kindergartens and schools. Currently, nurseries with their unrefomed staff composition cannot meet the need for early detection and interventions in the field of mental distress in children.

The MLSP continued to ignore the huge problems that exist, especially in the Family-Type Placement Centres (FT-PCs), related to the lack of adequate diagnosis and treatment of placed children, most of whom experience mental distress of varying severity. Non-detection and inadequate
treatment of mental suffering leads to abuse, including sexual violence and aggression. For the care staff in these residential services, neither specialised trainings nor accompanying team building and supervision activities are secured with financing.

**Drug use by children and measures to restrict access to drugs**

According to the European Drug Report 2019, the use of cannabis, MDMA (ecstasy) and other drugs among young people in Bulgaria showed a steady upward trend. Drug use among Bulgarian school children is also high, according to a study by the ESPAD (European School Survey on Alcohol and Other Drugs), which collects data on substance use among 15- and 16-year-olds and tracks trends in individual countries. In Bulgaria, illegal substances continue to be considered the most readily available compared to the rest of Europe.

44% of respondents indicate marijuana as readily available

According to the survey, 44% of the respondents in Bulgaria indicate that marijuana is readily available, 23% of Bulgarian school children consider amphetamines readily available, while methamphetamines – 17%. The frequency of early use initiation (under 13 years of age) of amphetamine or methamphetamine in Bulgaria is the highest – 3%.

23% of school children consider amphetamines readily available

17% of school children consider methamphetamines readily available

In 2019, a draft National Strategy for Combating Drugs (2019 – 2023) was prepared. The approval of the financial justification and submission to the Council of Ministers is due to happen next.

While the results of its implementation are expected only after a five-year period, the situation with the drug use in the country is getting more complicated and shows lack of understanding regarding the problems of drug addicts, on the part of the institutions. The problem is both a health and a social problem. The most at-risk group are children aged between 14 and 18, but the existing programmes for minors are not enough. Addicts are not encouraged to seek help from teachers or parents because they fear punishment and stigma. While hiding their problems, these children continue to use drugs without any hope for adequate help, especially those living in villages and small settlements.

**Children smoking cigarettes and hookahs**

No tradition to conduct surveys on smoking among children and young people has been developed in Bulgaria. Bulgaria is a member of the international study Health Behaviour among School Aged Children (HBSC), a study under the aegis of the WHO, which collects nationally representative data, including on smoking among teenagers.

The latest data from 2018 show that 19% of 15-year-old students smoke cigarettes every day, and 10% of them have smoked a hookah for more than 30 days.

According to Eurostat data for 2016, 34.7% of 15-year-olds in Bulgaria smoke (compared to 32.6% in Greece).

According to the European Commission’s Health Profile for Bulgaria for 2017, the prevalence of smoking among 15-year-old boys is the second highest in the EU (21%, after Croatia), while 30% of 15-year-old girls are regular smokers, which is the highest level in the EU.

**Infant mortality**

In 2018 a decrease in the infant mortality rate in the country of 5.8‰ per thousand live births was reported; in previous years it was: 6.4‰ for 2017, and 6.5‰ for 2016. The Ministry of Health for yet another year has indicated that the level of infant mortality was the lowest in the demographic statistics of Bulgaria, as well as the goal set in the National Health Strategy 2020 for that rate – below 6.8 per 1,000 live births, was also met. Unfortunately, our country continues to lag behind the average infant mortality rate in the European Union, which is 3.6‰.

In 2018, the major differences in the infant mortality rate between the different towns in the country, as well as between urban and rural areas remained. While for Sofia-city the rate was 2.7, for Razgrad it was 10.6 and for Plevens and Pazardzhik it was 11.3 and 9.1, respectively. The infant
Implement the relevant national policy for improving the access to healthcare for the representatives of vulnerable groups at local level by developing the activities of health mediators on the basis of the real needs of people;

Systematic improvement of the skills level of inclusive education teams through specialised trainings related to the early diagnosis of mental suffering;

Develop a network of medical-psychological and social services where children and parents to be referred to for systematic treatment and support;

Introduce active systemic prevention, along with more effective implementation of measures to limit the demand and to eliminate the possibility for minors to be involved in distribution of drugs;

Systematic efforts to raise awareness and create conditions for building skills that promote a healthy lifestyle and human health. Develop a government policy for systematic training in healthy diet for children in kindergartens and schools. Effective control over school and kindergarten meals, including the free snacks and the food in the shops in the vicinity of and on the school grounds;

Remove the outdoor advertising of tobacco and related products (including cigarettes, e-cigarettes and heated tobacco products, as well as the relevant equipment), as well as their display in a visible place at the points of sale;

Introduce a national document – a template for ‘Individual Admission Plan’, containing full information about the child’s health condition and any specific diet needed, obliging the persons responsible for the child’s care to observe the specific individual needs;

Analyse the national situation with the infant mortality, and consider the causes of any high levels in certain towns. Plan and implement specific measures and actions to overcome the differences in infant mortality rates between towns, as well as between urban and rural areas;

Establish specialised health and social services and early intervention and treatment programmes for children and young people experimenting with and/or using drugs, where children involved in drug abuse and their relatives have the opportunity to receive long-term and professional support.

The trend of varying infant mortality rates between urban and rural areas continues, with these rates being 5% and 8.1%, respectively.
EDUCATION

GOOD 4.00

This is the area where the greatest progress has been made with the help of public funds and governance. Despite the problems with the quality of education in small settlements, cluster schools, functional illiteracy, formal inclusive education in many places, in general, the government has made a commitment and keeps it. The Preschool and School Education Act has introduced regulatory conditions for the inclusion of children at risk in the educational process. This is a mandatory first step, the importance of which must be taken into account. Unfortunately, the quality of this process does not lead to genuine inclusion of children or learning, acquisition of knowledge, skills and competencies.

More young teachers in the schools

The relative share of teachers under 30 in 2019 was very small. At the same time, the increased demand for teachers in the whole country continues. In the 2018/2019 school year, the number of teachers under 30 in the system of school education was only 6% (3,650 out of 62,548). In kindergartens, the teaching staff under 30 is of slightly higher proportion – about 9.5% (1,871 out of 19,199), but still insufficient. These figures do not show any significant progress in attracting young teachers and compensating for the expected retirements.

The problem with the teaching staff in the small and remote settlements is getting worse. This year the process was further complicated by the optimisation of staffing levels in some schools as a result of the different percentage increases of the total school budget and of the teachers’ salaries, which makes it very difficult to recruit qualified teachers in certain subjects.

Against the background of all the measures taken, there are still gaps in the system for recruiting, training and supporting new teachers in the education system. University training is rather theoretical and missing real classroom examples. Even if they decide to become teachers after university, graduates enter school without the necessary practical skills. There is no clear process for introduction to the school team and needs-based training. The process of appointing a school mentor to the newly appointed teachers is also unclear and rather on paper.

Inclusive education

In the last year, the Ministry of Education and Science has continued its policy to support the process of inclusive education. Under the module ‘Providing a modern specialised environment in the special educational support centres by modernising the infrastructure for providing support for personal development of children and students’ of the National Programme ‘Providing a modern educational environment’ in the special educational support centres conditions were created for building an infrastructure adequate to the needs of children. Under this Programme funds were allocated also for school infrastructure, related to teaching sciences and for the all-day organisation of the school day.
Digital and media literacy (DML) in education

It is necessary for DML to be more explicit in the state educational requirements for the relevant subjects, in view of its development in children from the elementary level up to the completion of secondary education. Although individual components of DML are present, there is still lack of a comprehensive systematic and holistic approach, as well as a link between the development of DML and the situations in real online and offline life of children. Social and communication skills in both settings continue to be particularly weak, as evidenced by the increased level of online and offline bullying.

Despite the government efforts and investments, they still do not go beyond providing technical equipment and in the planned next steps the development of digital media literacy still remains mainly in the field of IT and additional activities, and in other subjects it is limited to mostly digitising the learning content. There is still a lack of a holistic approach to developing key skills in the digital as well as in the real-life environment.

The gaps in these skills were once again reaffirmed by the results of the school-leaving exams, when the Media Literacy Coalition (bringing together 16 organisations) issued a position that a serious reform is needed, including development of skills for critical thinking, search, evaluation and analysis of information, teamwork, safe communication skills. This need is also evident in the unsatisfactory results in functional literacy shown by the Bulgarian children at the International Student Assessment PISA 2018.

Additional funds are provided for the appointment of pedagogical counsellors and school psychologists. However, more and more focused efforts are needed to ensure and provide support to children at risk, that goes beyond the additional lessons in the school subjects. For this group, support is facing challenges related to lack of methodologies, lack of human resources (often there are no specialists in the educational institutions) and last but not least, lack of funding. In this sense, it is also necessary to improve the coordination of social, health and educational professionals.

Access to education is important, but so is the quality of education that children and students receive. In this sense, it is necessary to establish a mechanism for monitoring the quality of inclusive education in schools and kindergartens and to offer appropriate support to those institutions that have indicated that they need it, as well as additional incentives for those who move with bold and quick steps ahead of the rest.

Bulgaria’s results in measuring the functional literacy of 15-year-olds in the International Student Assessment PISA 2018 survey were announced at the very end of 2019. In addition to declining overall student performance, there is a new trend – the share of students with best performance decreases at the expense of the share of those with the lowest achievements, which increases. This trend is particularly serious for sciences, where in addition to a decrease of 22 points in the overall performance, the percentage of students below the critical level 2 (which shows in fact almost complete functional illiteracy) reaches the critical 46.6% compared to the average for the Organisation for Economic Co-operation and Development (OECD) 23.5%. Students above level 5 are only 1.5%, while the OECD average is 7%. This shows that the decline in student achievements is beginning to go beyond their social background and is to be sought in the lack of a comprehensive vision of education as education aimed at developing skills for participation in social and economic life, rather than simply accumulating knowledge in the school subjects.
Proportion of Bulgarian students with results below level 2 and at levels 5 and 6 in science, PISA 2006, 2009, 2012, 2015 and 2018

<table>
<thead>
<tr>
<th></th>
<th>Bulgaria: below level 2</th>
<th>OECD: below level 2</th>
<th>Bulgaria: levels 5 and 6</th>
<th>OECD: levels 5 and 6</th>
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<tr>
<td>PISA 2006</td>
<td>3</td>
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<tr>
<td>PISA 2009</td>
<td>19.9</td>
<td>17.8</td>
<td>36.9</td>
<td>17.7</td>
</tr>
<tr>
<td>PISA 2012</td>
<td>3.1</td>
<td>8.3</td>
<td>2.9</td>
<td>7.7</td>
</tr>
<tr>
<td>PISA 2015</td>
<td>1.5</td>
<td>7</td>
<td>23.5</td>
<td>21.3</td>
</tr>
<tr>
<td>PISA 2018</td>
<td>7</td>
<td>46.6</td>
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</tbody>
</table>

Source: OECD/PISA

Health and sex education

"I don't believe that the lessons are enough to receive a good health education. We don't talk about the harm of drugs, smoking or sexually transmitted infections."

Unlike their peers in Western Europe, who receive age-appropriate health and sexual education, Bulgarian children and teenagers are deprived of the opportunity to receive information based on the latest research and use it to make informed decisions for health-conscious behaviour. The standards developed by the World Health Organisation for sex education in Europe could be used in Bulgaria. The following facts show the lack of adequate health education at school:

- In 2019, according to the National Centre of Public Health and Analyses (NCPHA), abortions by children are 2,037, which shows an increase by 37 cases compared to 2018. In 2019 abortions performed by girls aged under 15 are 146, and among girls aged 15 – 18 are 1,891;
- 3,073 are the child births by mothers who have not reached the age of majority in 2018;
- 264 children have been sexually assaulted, according to data from the Ministry of Interior;
- In 2019, a nationally representative survey among children on obesity and the latest NCPHA national survey were launched. 3,379 children aged 7 in the first grade were examined. The data show high proportion of overweight children – 29.8% for boys and 28.7% for girls, and children with obesity – 15.4% for boys and 11.4% for girls;
- Acute intoxications related to alcohol and drug use among children are also increasing, and for 2019 the NCPHA data show acute intoxications of 1,600 children:

<table>
<thead>
<tr>
<th>Children</th>
<th>Alcohol</th>
<th>Drugs</th>
<th>Alcohol and drugs</th>
<th>Total</th>
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</thead>
<tbody>
<tr>
<td>Minors under 15</td>
<td>568</td>
<td>123</td>
<td>116</td>
<td>807</td>
</tr>
<tr>
<td>Minors aged 15 – 19</td>
<td>599</td>
<td>151</td>
<td>43</td>
<td>793</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,167</strong></td>
<td><strong>274</strong></td>
<td><strong>159</strong></td>
<td><strong>1,600</strong></td>
</tr>
</tbody>
</table>
The data from the access to public information show that in 2019 the Ministry of Education and Science, the Ministry of Interior and the Ministry of Health carried out numerous health promotion activities in schools and kindergartens. These activities were primarily of a campaign type and did not involve in-depth measures that may lead to changing the systems in order to establish sustainable and continuous health education of children, and reduce the negative trends.

Health education in the country was placed under serious attack by groups that use the topic to spread fear and rumours in the society and among parents. Probably in the coming years this will be a topic that will be put under serious discussion in the public space and will increasingly challenge adults on whether it is appropriate to provide health education. These attacks happen not only in Bulgaria, but also in many other countries. In a number of surveys, including those conducted by the Rapporteurs, children unequivocally state that the topic is important and very much needed because learning from hearsay, on the street or from pornographic websites cannot be the only way to learn. According to the children and young people, the information should be structured and clear, timely and professionally presented during their most turbulent time of growing into adulthood.

**RECOMMENDATIONS**

- Expand the training of education mediators to acquire the necessary competencies and skills, including by making use of the available experience of civil society organisations;
- Update the design and extend the National Programme for Support of Desegregation, including through a campaign to promote it among potential municipalities;
- Continue the reform in the system of delegated budgets, especially with regard to raising the amount of the uniform expenditure standards, so that schools with a smaller number of students could get operational freedom and security for their functioning;
- Engage NGOs working in the field with the most marginalised families and communities, including by delegating activities and resources to work with parents;
- Supplement the Coverage Mechanism with work to adapt the children to the classrooms, including through the use of innovative educational methods;
- Conduct a comprehensive analysis of the effectiveness of the measures already launched under the Mechanism;
- Focus on attracting motivated, innovative teachers at the elementary level of education. Expand the programme ‘Motivated teachers’; make demanding selection and provide in-depth training to the teachers in it;
- Update the university curricula in pedagogy; include more practice from the first year;
- Improve the support system for young teachers (‘induction’ process for the new teacher, mentors, additional training for first-time teachers, meeting their needs);
- Update the competitive procedures for directors of educational institutions with a focus on the motivation to apply, the competencies for planning, organising and control, resource management and social and civic competencies. Provide more and wider scope trainings for development of leadership and management skills.
Increase the hours for assessment of the individual needs of a child/student with special educational needs, allocated to the regional centres for supporting the process of inclusive education, in order to cover systematic and long-term assessments and development monitoring;

Create and make full use of the opportunities to appoint teacher's assistants to support the inclusive education in the real process during compulsory schooling;

Revise the curricula in order to develop the digital and media literacy of children from the elementary level until the completion of secondary education, which should be included in the state educational requirements in all relevant subjects. Apply a holistic approach to develop key skills and competencies, such as critical thinking skills, searching for, evaluation and analysis of information, teamwork, ability to communicate safely;

Wide introduction of digital technologies in the education of children with special educational needs and children with disabilities;

Integrate the existing, proven by the NGOs experience and based on the WHO recommendations, health education programmes in schools, in line with the State educational standard for civic, health, environmental and intercultural education;

The government and political parties should not succumb to misinformation and propaganda by extreme conservative groups regarding sexual and reproductive health education for children and young people.
6. FAMILY ENVIRONMENT AND ALTERNATIVE CARE
The deinstitutionalisation process continued in 2019, but the problems that accompany the services in the Family-type Placement Centres and the quality of care for the children placed there remained unresolved and ignored. The number of children living away from their families remains relatively unchanged. There has been no progress in foster care and adoption.

The departure from the family support policies with the postponement of the Social Services Act and the Strategy for Child led to an indefinite delay in the implementation of specific family support measures and measures for prevention of the separation of children from their families.

Deinstitutionalisation and residential care

Although the end of the specialised institutions of the old type is near, the issue of excessive use of residential care in the Family-type Placement Centres and its quality remained on the agenda and are of particular seriousness and urgency. Unfortunately, the big number of children in one centre – 14, ignoring the recommendations made for each child based on individual assessments, urgent regrouping of the children and moving them to a FTPC at the same time, as well as the extremely low financial standard, led to many problems that compromised the model of alternative community-based residential care as set out in the UN Guidelines for Alternative Care for Children. The reasons for the problems in the FTPCs that have been identified from the very beginning in a number of external evaluations (Lumos Foundation – 2016, UNICEF – 2014, etc.), as well as evidence from the practice, provided by the providers of this service, were reflected in the 2018 Analysis of the Standing Expert Working Group (SEWG) at the State Agency for Child Protection (SACP) on the role of residential care in the system of child protection measures. For a year and a half now there has been no reaction to the measures for improving the quality proposed in the report.

It is worrying that in the already built FTPCs for placing the severely institutionalised children and young people, continue to be placed also children and young people from the community. An analysis by the SACP shows that “most children placed for care away from their families in the FTPCs came from a single-parent family, a large family, a family where one of the parents has died or the parents are permanently residing in a foreign country.” This leads to the conclusion that the support services for the birth or extended family and foster care for children with disabilities or challenging behaviours are insufficient or do not have the capacity to cope with such cases. The information received from the SACP, Agency for Social Assistance (ASA) and Ministry of Labour and Social Policy in connection with the drafting of the Report Card made it clear that in the new Social Services Act are laid down many positive changes to improve the family support, and its postponement or repeal will exacerbate the existing problems. The Social Services Act provides for measures to develop services where they are lacking, for improved access and choice, integration and continuity of support, standards and quality control, investment in the capacity of people who provide support, prevention through public services, more flexible use of public resources. Access to social services for children with disabilities is facilitated. The law is an important resource for preventing institutionalisation and closing the gate to the FTPCs.

Progress has been made with the opening a Safe Zone for unaccompanied children.

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“As an important omission, I would point out the lack of a realistically feasible plan and strategy for young people leaving the institutions after they turn 18.”

Foster care

In search of the necessary quality foster care, some concrete measures have been taken, but there is still no clearly defined long-term goal. There is no overall vision for the development of the service in the country, and the key problems in the foster care social service remain unaddressed and unresolved.

Foster care is one of the main child protection measures, the development of which contributes to the process of deinstitutionalisation of child care in Bulgaria, and is part of the transition from institutional to community-based care.

For the period from 01.01.2019 to 30.09.2019 there were 2,258 foster families active in the country (including 2,245 professional and 13 voluntary ones). A total of 2,117 children are placed with them. An analysis of ASA under the ‘Accept me 2015’ project indicates that for the mentioned period the number of deleted foster families exceeds the number of newly approved, which is an extremely alarming indicator. The number of foster families is decreasing, and this is not due to a reduced need for this type of social service. A large number of children continue to be abandoned or to live outside family environment, including in institutional or residential care.

Foster care in Bulgaria continues to be financially supported mainly by project activities with funds from the European Union, and this has not changed in the past 2019. The ‘Accept me 2015’ project under OP HRD 2014 – 2020 started on 01.12.2015. The fact that from the very beginning until now the foster care social service has been a project activity results in lack of sustainability and instability, a decline in the motivation of the members of the foster care teams and of the active foster parents themselves. However, it is important to emphasise that under projects the foster care social service is being provided as a complete social service. Its fragmentation into separate activities would have a detrimental effect on it, therefore it is necessary after the end of the ‘Accept me 2015’ project to provide an opportunity to continue this type of provision through services established under the new Social Services Act. Its adoption in March 2019 by the National Assembly created the necessary prerequisites for the full provision of the service, but since this Act has not yet entered into force and its secondary legislative framework is not available, it is not possible to say whether and to what extent these well-designed prerequisites will be put to practical use.

For another year, no funds have been invested in a positive national information campaign on foster care – the information is piecemeal, sporadic and without a clear vision of the nature of the service. The continuing abdication of the Managing Authority of HRD OP from the development of this vital social service reinforces the strongly negative media content on the topic instead of lowering it. Foster parents feel abandoned and are strongly demotivated by the lack of support expressed in the form of respect for their work and the everyday dedication to the children placed with their families.

It is essential for the Bulgarian reality to meet the specific needs of several different groups of children, including children with disabilities, children in conflict with the law, unaccompanied children, teenagers and other vulnerable groups for whom placements are generally more complicated. There are no measures to encourage and support these placements and they remain a very small part of the total number of placed children.

Traditionally, along with foster care placements, the development of the child protection measure ‘placement in kinship care’ is also monitored. A total of 4,637 children were placed in kinship care as of 30 September 2019.

Adoption

It is important to note that there is no comprehensive government policy to support adoption, that would raise the public awareness of the benefits and opportunities that adoption provides, as well as of the objective challenges it faces.

In violation of the Family Code requirements, the ASA has not yet developed a certified National Electronic Information System of the children eligible for adoption under the conditions of full adoption (Article 83, para. 1) and a National Register of prospective adopters for full adoption (Article 85).
Protection and integration of unaccompanied minors

The data of the number of unaccompanied children by the different institutions differ dramatically. According to the data of the State Agency for Child Protection for the period 01.01.2019 – 31.12.2019, 620 unaccompanied children, seeking international protection, have been registered, of whom 614 boys and 6 girls.

In June 2019, the long-awaited Safe Zone for unaccompanied children was opened in one of the State Agency for Refugees (SAR) reception centres in Sofia. Its total capacity is 238 places. For the first time, unaccompanied children are guaranteed 24-hour care, which is currently provided by the International Organization for Migration (IOM).

The Safe Zone does not have the status of a social service, and unaccompanied children can only stay there during the procedure for granting international protection. By the end of 2019, 196 unaccompanied children were placed there.

The opening of the Safe Zone is certainly a positive development in terms of ensuring the safety and care for the unaccompanied children. However, the number of children who have left before the end of their proceedings for international protection and for whom there is no information about their current location is very high. According to data provided by the IOM, these are 178 children, which represent 91% of all children placed in the Zone. The total number is even higher, this conclusion may be drawn when comparing the data and taking into account the fact that not all unaccompanied children who applied in 2019 were placed in the Safe Zone.

Integration is a lengthy process, the results of which may be seen after a longer stay of the children in Bulgaria.

Education is among the most important factors for successful integration, and the school to a great extend supports the faster learning of Bulgarian language and is a place for establishing social contacts. The number of children enrolled in school remains too low – 39, with 10 of them from the children placed in the Safe Zone.

This group of children still has very difficult and limited access to social services. They mainly benefit from the social programmes of the non-governmental organisations supporting refugees, which are implemented mostly in the reception centres of the State Agency for Refugees (SAR).

Mandatory support services for the child and the adoptive parent in the post-adoption period are still absent. The monitoring carried out by the CPDs is formal, often without real support and sensitivity to the child’s and adoptive parents’ past, and to their individual traumas. No preventive work is done with the newly formed families, but only reactive work, after a problem has been reported. The accumulated information is not processed and analysed to identify indicators, good practices and propose changes in the practice and legislation.

There is an alarming trend of increasing number of terminated adoptions, and moving the adopted children away from the adoptive families and placing them in residential care. It is necessary to keep statistics on adopted children who are placed in residential care, as well as to analyse the reasons leading to the repeated abandonment of children. There is also a mismatch between the number of the actually terminated adoptions and the statistics kept by the ASA.

There is no in-depth qualitative and quantitative analysis, as well as a justification of the reasons for the decrease in the number of children entered in the Adoption Register, as well as the year-to-year declining number of adoptions, when there is a relatively equal number of children raised outside the family environment and a relatively equal number of prospective adoptive parents.

The feedback from the upgraded training program for prospective adoptive parents, developed in 2018 together with NGOs working on the topic of adoption and approved by an order of the Minister of Labour and Social Policy, is positive. It is important to note, however, that the issue with the actual assessment of the prospective adopters remains open – assessment, which is performed by Child Protection Departements (CPD) staff, who are experiencing a constant turnover, overload and often focus on the formal part of the work. There is still no information about any adequate training on assessing the motivation of the prospective adoptive parents, planned and/or provided to the CPD social workers, as well as supervision to support of their everyday work ‘in the field’.

There is a mismatch between the number of the actually terminated adoptions and the statistics kept by the ASA.
RECOMMENDATIONS

- Entry into force of the Social Services Act to ensure higher quality of family support and accessibility of family support services;

- Placement of children and young people in the FTPCs only after all options for support or alternative family care have been exhausted, including review of the cases by the Coordination Mechanism at the regional level, provided for in the Updated Action Plan 2016 for the coordination mechanisms at regional level. Reducing the number of children in the FTPCs groups, following the change of the method of financing in line with the new Social Services Act, to make it possible to provide the most qualified and personalised environment and care;

- Use the planned assessment of all children and young people in the FTPCs under the operation ‘Continuing Support for the Deinstitutionalisation of Children and Young People’ to identify those who may be placed in families or in more independent forms of community-based care (e.g. sheltered homes) and plan funds in the new programming period for the development of foster care for the most complex cases of children, and develop a new type of support for independent living in the community for young adults with disabilities;

- A comprehensive analysis and long-term vision and plan for the development of the foster care service, including its provision as a regular commitment of the state, including with a clear financial standard rather than under project activities, and ensure continuity for the progress made so far. Provide a permanent package of advanced training modules, individual and group supervision, counselling and support groups for foster families and for the regional foster care teams;

- Develop foster care for children with special needs – behaviour difficulties, children with disabilities, victims of violence, etc. The increase in the number of children with special needs placed in foster care should be accompanied by a package of additional social support and services directly targeting the child and the family, including adequate involvement of the health and education systems;

- Plan and conduct a national level awareness raising campaigns on foster care and recruitment of new foster families, taking into account the plans for closing down specialised institutions;

- Take action to implement the recommendation of the Universal Periodic Review of the Human Rights Committee for Bulgaria, 2011 (UPR)91 to Introduce legislation prohibiting secrecy in adoption and guaranteeing the right of the child to know his or her origins; and regulate methodology for collecting, storing and accessing information, protecting the interests of all three parties;

- Introduction of the Central Register of adopters and adoptees provided for in the Family Code. Keeping statistics of the adopted children who are placed in residential care services, as well as of children for whom there is a risk for the adoption to be terminated. In-depth analysis of the reasons having led to repeated abandonment of children;

- Legalise an earmarked maternity leave and paternity leave for adoption for children aged 5 and over;

- Improve the procedure for examining prospective adoptive parents, including extension of its duration, regulate more meetings with a social worker and psychologist, refine the criteria for enrolment, increase the training of prospective adoptive parents and its distribution across the various stages. Draft a methodology for training and monitoring for social workers, for their activities with prospective adoptive parents and children who are about to be adopted, in the pre- and post-adoption period;

- Optimise the procedures for transfer of information between the institutions in view of the reliability and accuracy regarding the number of unaccompanied children;

- Increase the number of unaccompanied children enrolled in school;

- Develop and introduce a single standard concerning representation.
7. JUSTICE FOR CHILDREN
There has been no progress in reforming the child justice system. The Ministry of Justice (MoJ) pointed out that in 2019 the expert working group on the Deviation from Criminal Proceedings and Imposition of Correctional Measures on Minors Bill resumed their work. The draft Law and its justifications are prepared, however there is no clarity with regards to any future plans for moving this legislative procedure forward.

Rights of child victims and/or witnesses of crime

Bulgaria has made a commitment to transpose Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, however the legislative changes made in this regard are partial, they restrict the access of child victims to protection measures and do not ensure the provision of specialised support services. The available infrastructure for child-friendly hearing of child victims of crime is not used widely enough.

According to preliminary data from the Ministry of Interior, the number of child victims of crime in 2019 was 2,268 children.

The incomplete transposition of Directive 29/2012 was the reason for the European Commission to initiate infringement procedure against Bulgaria on 7 March 2019 and to send a reasoned opinion to the competent authorities, giving the country two months to bring its national legislation in line with the provisions in the Directive. Among the unresolved issues is the creation, provision and maintenance of specialised services for victims of crime. With regard to the equal access of children to protection measures, the procedure for preparing an individual assessment of protection needs and the competence of the persons who prepare it, the provisions of the Criminal Procedure Code (CPC) introduced in 2017 and still in force today are in direct conflict with the requirements of Directive 29/2012. Art. 22, para. 4 explicitly states that “child victims shall be presumed to have specific protection needs due to their vulnerability to secondary and repeat victimisation, to intimidation and to retaliation”. The CPC narrows the applicability of this presumption, making it conditional on the one hand, on the subjective assessment of the determining authority, and on the other – on the existence of a certain procedural capacity. The use of the construction ‘underage person (minor who has not completed 14 years of age) witness or witness with special needs’ (Art. 280, para. 6 and Art. 281, para. 1, item 6 of the CPC) restricts access of minors (14-18) to protection measures and those who have not been constituted as a party to the proceedings or a participant in the proceedings. The multidisciplinary approach required by the Directive in the process of making the individual assessment for the presence of specific protection needs has also not been adopted. Instead, this assessment has been introduced in the CPC in the form of an expert assessment (Article 144, para. 3 of the CPC), which is generally done individually, by an expert witness without clear requirements regarding his/her competencies.

Child victims of cyber crime and harassment

Certain progress in this area can be reported in the work of law enforcement authorities. By 2019, the specialised web portal cybercrime.bg, managed by the General Directorate ‘Combating Organised Crime’ of the Ministry of Interior, has already been operational, and ‘Child Exploitation’ is one of its two main sections. The portal purpose is mainly preventive and informative, and if the information there is relatively comprehensive with regards to the various types of online exploitation and assaults, the information aimed to directly inform children is too little, and contains the typical warnings – not to share personal information and files with strangers and to inform their parents about everything they do or happens to them online. On the positive side, children also have the opportunity to report and there are guidelines in relatively easy to understand language on how they can back the report with evidence. However, the main responsibility for communicating the risks related to their online behaviour has been transferred to their parents.
The rights of children in conflict with the law

Children in conflict with the law are all individuals from 14 to 18 years old, who are suspected, accused, convicted or serving a sentence for a crime. In Bulgaria, the institutions perceive as ‘a child in conflict with the law’ also minors who have not completed 14 years of age who are registered in the system of combating anti-social behaviour of minors.

Since 2011 the government has given conflicting signals as to its willingness to reform the existing justice system for children, and no result has been achieved so far. 2019 is yet another year with no significant progress in this area. Small steps have been made with very little impact.

The Ministry of Justice (MoJ) pointed out that in 2019 the expert working group on the Law on Deviation from Criminal Proceedings and Imposition of Correctional Measures on Minors Bill resumed their work. The draft law and its justifications are prepared. The Ministry has not quoted any future plans to progress with this law, nor has it given any hope for an upcoming repeal of the outdated Law on Combating the Anti-social behaviour of Minors and Under-aged.

The tendency to misunderstand the main problems with ensuring the rights of children in conflict with the law remains alarming, namely the lack of specialisation of professionals in all units working with the child in this situation and investing solely in practices that have scientifically proven effect instead of in practices producing somewhat questionable results.

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

Despite the steps taken and the commitment made to develop child-friendly justice, their participation in proceedings under the Family Code is still not regulated in the law. There is no unified methodology to examine, and respectively ensure the best interests of the child, regulated in the current legislation and applied unambiguously by experts in the field. At the same time, in 2019 there was no upward trend in referring parental conflicts to alternative forms of finding a solution that is in line with the lack of a clear commitment on the part of the government to make the latter a priority as a way to ensure the best interests of the child.

In 2019, under a wide public consultation was the draft new National Strategy for the Child 2019 – 2030 which had envisaged ‘Guaranteeing the right of every child to a safe environment, prevention and protection from violence and other harmful actions and effective access to justice’ and ‘Provision of opportunities for the child to participate in decision-making on matters that affect him/her’. To this end, the Strategy relied on a comprehensive reform in the area of justice for children and the establishment of a child justice system geared towards children’s rights. At the same time, the specific measures of how this will be done were not described. No such specific measures for legislative amendments were taken in 2019. Thus, the observance of the best interests of children involved in the proceedings under the Family Code, in practice, was left in the hands of social workers from the Directorate for Social Assistance. They are the government authorities to which the current legal framework refers the court in order to establish if a solution submitted for approval by the court or considered by the judge is in the best interests of the child. All this places an unbearable administrative burden on the limited resources of the Agency for Social Assistance, and in practice for yet another year has proven its inadequacy to achieve this. At the same time, our legislation fails to consider the introduction at the legislative level of a list of criteria that characterize a solution as meeting the best interests of the child.

Civil society organisations are actively working to address the above problem. One such example is the “Children on Focus in the Judicial System Reform” project, which aims to develop a procedure for informing parents about the negative aspects of parental conflict, the ways to overcome it and how mediation can help them in that. Along with this, a unified methodology has been proposed for examining the best interests of the child and its application through the eyes of judges, lawyers and mediators. Although this is not part of a targeted government policy in this area, it is conducive to ensuring the best interests of the child in the course of court proceedings under the Family Code.
RECOMMENDATIONS

➡ Fulfil Bulgaria’s commitments to the European Commission on the overall transposition of Directive 2012/29/EU establishing minimum standards on the rights, support and protection of victims of crime, thus ensuring unconditional access for all child victims of crime to protection measures and specialised support services;

➡ Take measures to expand the application of the procedures for child-friendly hearing of child victims of crime, incl. in the specialised premises built for this purpose (‘blue rooms’);

➡ Repeal the Combatting Antisocial Behaviour of Minors and Underaged Persons Act and submit for consultation and adoption the prepared Law on Correctional Measures against Persons Having Committed a Crime or Administrative Violation before Coming of Age;

➡ With regard to children in conflict with the law, only practices with scientifically proven effect and impact to be applied;

➡ Adoption of a unified methodology for examining the best interests of the child, to be applied by the various experts involved in resolving parental disputes;

➡ Increase the number of court referrals to mediation in parental rights disputes and unify the way it is done;

➡ Increase the number of hearings of children in parallel with the establishment of uniform criteria for the cases in which this would be appropriate;

➡ Create a unified system for tracking family cases and traceability of the individual acts issued in each type of case.
8. CHILD PARTICIPATION
The formal government approach to child participation continues. Despite individual initiatives for child participation, no understanding and intention exist for an overarching targeted process to ensure this right.

Opportunities for receiving feedback and consulting children through digital platforms are not fully utilised. There are still no appropriate mechanisms to take into account the views of children in their interaction with institutions.

In 2019 once again no development in the subject area of child participation was witnessed. It is still relevant, but is primarily discussed in a declarative manner, and its implementation remains mostly formal and inconsistent with European and international standards. There is still no clear and common understanding of what the authentic child participation is, hence the dominant attitude being that the child is primarily an object of influence, rather than a separate individual and complete person with all the rights, including the right to an opinion. The absence of such an understanding makes a lot of the already existing forms of child participation rather formal in nature. Although such forms like children’s councils or parliaments at national, regional, municipal and school level do exist, even though them children can very rarely have any real impact on the decision-making, and still very often do not receive the information that concerns them in an understandable and age-appropriate form. Children are not often asked for feedback, and even when they are, this is done without giving them appropriate and easy to understand information on the topic.

A comprehensive and systematic approach to child participation is still absent, as well as consistent financial support policies. Thus, to a large extent, the opportunity for child participation remains a matter of personal motivation and an individual initiative of some children or is implemented mainly by non-governmental organisations, and funding continues to be mostly external.

The Ombudsman and the SACP continue to be the main institutions that make targeted efforts to develop child participation. The Ombudsman holds consultations with children and has implemented her initiative for ‘A Child Ombudsman’. The SACP carries out its child participation activities mainly via the Children’s Council supported by the Agency, and in line with the Council of Europe Child Participation Assessment Tool, but the report on this tool is not public.

The efforts of the Ministry of Education and Science to promote child participation through the publication ‘Students’ Government. Guidebook’ should be noted. This publication makes connection between the exercise of individual and of collective rights and provides a broad basis for introducing standards for child participation in school. The proposed approaches enable the school to encourage child participation in a wide range of global and significant topics that children are interested in. The publication also makes a connection between the child participation and the very core of pedagogy following the entire historical development of this science.

At the same time, the Ministry of Education and Science could make more efforts to train and educate teachers on the topic of the rights of the child and child participation, as well as to try to find mechanisms to assess the activities in the existing forms of child participation and promote their effectiveness, as well to disseminate good practices.

At the national, regional and municipal levels there is still no diversity of forms of child participation. Children’s councils and parliaments are the main form of child participation, as well as to try to find mechanisms to assess the activities in the existing forms of child participation and promote their effectiveness, as well to disseminate good practices.

There is still insufficient preparation and training of professionals in the different areas who work with children, or among others, with children, on the topic of child participation and on the topic of children’s rights in general, as the issue of participation should be addressed exactly in this context.

“Ever since kindergarten, we should communicate with children with respect and shall observe their right to an opinion, rather than try to discipline them by pressure and manipulation.”
RECOMMENDATIONS

- Define the authentic child participation so as to achieve and establish a shared understanding, to lay the foundation for its practical implementation at national, regional and municipal level;

- Create mechanisms for seeking and reporting feedback from children on various decisions that affect them, including laws and regulations, which exists as an option with the ex-ante impact assessment required prior to any legal act;

- Present decisions and documents in a language easy to be understood by children;

- Plan and organise preparation and training for professionals from different fields such as education, social activities, healthcare, justice and law enforcement, on the rights of the child and child participation;

- Provide diverse forms and spaces for child participation that will allow to include maximum number of children, both at national, and municipal and school level;

- Expand the opportunities for individual child participation, especially in court and administrative proceedings;

- Develop the capacity of digital platforms for consulting children's opinions or to facilitate their initiative to survey the opinions of other children.

- Adopt a Law on Volunteering in Bulgaria.
NETWORK MEMBERS

Burgas Region

Varna Region

Veliko Tarnovo Region
'International Social Service' Foundation – Veliko Tarnovo 'Youth Tolerance' Association – Gorna Orahovitsa Centre for Interethenic Dialogue and Tolerance AMALIPE – Veliko Tarnovo

Vidin Region
'Organization Drom' Association

Vratsa Region
'First of June' Association – Byala Slatina 'Science and Technology Centre' Association – Vratsa 'New Way' Association – Hayredin School Board of Trustees of 'Hristo Botev' School – Tarnava

Gabrovo Region
CYMCA Gabrovo Association 'Social Dialogue 2001' Association – Gabrovo

 Dobrich Region
'Helping Hand' Foundation – Dobrich

Kardzhali Region
Association 'Initiative for Development – Kardzhali Decides' – Kardzhali

Kyustendil Region
Parental Boards of Trustees of Kindergarten 'Kalina' – Dupnitsa Association Largo – Kyustendil Association 'Knowledge, Success, Change'– Dupnitsa

Louvech Region
'Ecomission 21st Century' Association – Louvech 'Knowledge' Association – Louvech

Pazardjik Region

Pernik Region
'PULSE' Foundation – Pernik

Pleven Region
Pleven Public Fund 'Chitalishta' – Pleven

Plovdiv Region
Foundation YES Plovdiv National Alliance for Volunteer Action – Plovdiv One Heart Foundation – Plovdiv

Razgrad Region
'Janeta' Association – Razgrad 'Phoenix' Association – Razgrad

Ruse Region

Silistra Region
'Ekaterina Karavelova' Women's Association – Silistra 'Hope for a Good Future' Association – Silistra

Smolyan Region
'Future Now 2006' Community Cultural Centre (Chitalishte) Sliven Region

Sliven Region
'The Health of Romany People' Foundation – Sliven 'Doctors of the World' Foundation – Bulgarian Branch – Sliven 'Roma Academy for Culture and Education' Association – Sliven

Sofo City Region
'Parents' Association Bulgarian Association of Adopted Children and Adoptive Parents Bulgarian Family Planning and Sexual Health Association Bulgarian Training Centre


Institute for Progressive Education 'Single Step' Foundation Foundation for Access to Rights (FAR) Reach for Change Foundation 'Zographiche' Centre 'Dechitsa' Foundation School Board of Trustees at Benito Juarez' School – 'Nadezhdha' Law and Internet Foundation Templo Foundation Our Premature Children Foundation 'Listen Up' Foundation National Foster Care Association 'Mam and Dad's Diary' Foundation 'ASSIST – Assistive Technologies' Foundation Association of Bulgarian Coeliacs – 'Gluten-Free Life' Association 'Mediation and Dispute Management Institute' (IMEUS) Foundation III Association of Parents of Children with Kidney Problems National Scouts Organisation of Bulgaria

Sofia Region
'Towards a Better Life' Association – Chelepche

Stara Zagora Region

Targovishte Region
'Academia 245' Association – Antonovo 'Naya' Association – Targovishte Club of NGOs – Targovishte

Haskovo Region
'Give a Smile' Foundation – Dimitrovgrad 'Opportunity for Protection' Association – Haskovo

Shumen Region
'SOS Women and Children survived violence' Association – Novi Pazar 'Association of Roma Women Hayatchi' – Novi Pazar Roma Spark Foundation

Yambol Region
Municipal School Board of Trustees – Bolarovo Chitalishte 'Umenie 2003' – Yambol