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Zvezda Vankova, Multi Kulti Collective Association for BCRM – 2013
1. Purpose and objectives of the Report

Since 2009 the Bulgarian Council on Refugees and Migrants has conducted an independent monitoring of the implementation of the National Program for the Integration of Refugees in Bulgaria (2008-2010) and (2011-2013) under projects funded by UNHCR Representation in Bulgaria and in partnership with the State Agency for Refugees with the Council of Ministers (SAR). The objective of the report is to make an analysis of the implementation of the National Program for the Integration of Refugees in the Republic of Bulgaria (NPIRRB) in 2014, and to put forward some recommendations based on the challenges and best practices identified.

2. Executive summary

The findings from the monitoring show that actions have been taken with respect to most of the measures laid down in the NPIRRB. Some of the measures are no longer topical, which has determined the management of the Integration Centre (IC) with SAR to no longer deliver on them, and others overlap.

The main challenges in the NPIRRB implementation are, as follows:

- The short duration of the Program, which in most cases covers a 6-month period after granting the status, is assessed as insufficient by the participants in the Program;
- The insufficient financial assistance and the delayed payment of the benefits, which explains why most of the newly recognized refugees either seek a job instead of availing themselves of the NPIRRB support or often drop from the Program after finding employment;
- The lack of flexibility in terms of both the scope of the Program and the delivery of the measures included in it. In 2013 the activities for providing support to newly recognized refugees were carried out on the territory of the city of Sofia, instead of covering the whole country, as foreseen in the NPIRRB. No specialized measures were applied to target vulnerable individuals;
- The implementation of the Program is not sufficiently secured in terms of financial and resource provision, which has unfavourably impacted the delivery of some important and topical measures for refugees' integration. Such measures are vocational trainings in computer skills, social orientation and cultural adaptation, seminars with stakeholders' staff, medical doctors and dentists, teachers, and anti-discrimination

1 The author has purposefully avoided any quantitative evaluation of the Program implementation, as the measures included therein do not have equal relative weight. For more details, see Table 1 in the Annexes.
activities. Out of a total of BGN 300,000 allocated for 2013, the amount of BGN 87,180.99 had been spent as of the beginning of 2013. While the financial estimates for 2013 include costs for the remuneration of a lecturer under the Social Orientation and Cultural Adaptation module, for Bulgarian language courses under individual programs, vocational training courses outside SAR, study visits to historic and cultural sites across the country, kindergarten fees, the relevant funds have not been provided to SAR's IC, which has made the implementation impossible. The one-off financial aid due in the fourth month following the enrolment in the NPIRRB have not been paid, neither have the families with children enrolled in the first grade at a state or a municipal school received the one-off target aid. The financial estimates do not envisage workshops with staff from stakeholder institutions, medical doctors, dentists and teachers, and the anti-discrimination activities. As the NPIRRB does not have its own budget, we can conclude that more than 2/3 of the funds planned have not been absorbed for the purpose of refugees' integration in the Republic of Bulgaria.

On the basis of the interviews and the analyses of the delivery of the integration measures, it can be concluded that the goal set in the NPIRRB: "each and every refugee, in the course of up to one year after being granted refugee status, should have access to financial support for housing, social assistance, health insurance, Bulgarian language training, social orientation and cultural adaptation, vocational training, translation/interpretation services, and facilitating the exercise of basic rights and opportunities" has not been fully achieved.

3. Institutional framework for refugees' integration in Bulgaria

The 2011-2013 National Program for the Integration of Refugees in the Republic of Bulgaria (NPIRRB) was adopted by a Decision of 5 January 2011, Protocol No 1 of the Council of Ministers of the Republic of Bulgaria. The Program provides for a number of measures whose purpose is to ensure the conditions for and to foster the process of refugees' integration in the Bulgarian society; these measures are reviewed with details in the report. The Program lays down the actions to be taken by the State Agency for Refugees with the Council of Ministers, other governmental institutions, local authorities and non-governmental organizations with a view to ensure an environment conducive to refugees' integration in the Bulgarian society.

Pursuant to the NPIRRB, any beneficiary of refugee or humanitarian status in the Republic of Bulgaria shall, within up to one year after being granted the status, have access to financial support for housing, social assistance, health insurance, Bulgarian language training, social orientation and cultural adaptation, vocational training, translation/interpretation services, and facilitating the exercise of basic rights and opportunities. As the relevant legal framework was not amended in 2013, the objectives and measures laid down in the NPIRRB
were still subject to the limitations ensuing from the provisions of the Law on Asylum and Refugees, which stipulates that an alien who has been granted refugee or humanitarian status may be provided with financial support for housing for a period of up to 6 months as from the date of coming into effect of the decision for status granting (Art. 32, para 3).

The institution directly in charge of the execution of the Program is the Integration Centre with SAR (IC). The IC determines the eligibility criteria, designs the package of integration measures, including the ones for refugees with special needs, the norms for their delivery, and ensures the arrangements for applying the package of integration measures. Non-governmental and other organizations act as partners in the implementation of the measures for the integration of newly recognized refugees.

A *National Strategy on Migration, Asylum and Integration (2011-2020)* was approved in 2011. The strategy includes among its target groups asylum-seekers, refugee and humanitarian status holders. SAR is one of the institutions involved in the implementation of the strategy which is ensured by means of annual action plans.2

In relation to the execution of the NPIRRB, an *Internal Regulation on the Application of the Measures for the Integration of Newly Recognized Refugees laid down in the National Program for the Integration of Refugees in the Republic of Bulgaria (2011-2013)* was adopted in December 2011. These internal rules were amended in 2013 by virtue of an order by SAR’s Chairperson No 03-350/25.06.2013. Humanitarian or refugee status holders who wish to apply are entitled to file an application for enrolment in the Program *within up to 2 months* after being served the status granting decision under the Law on Asylum and Refugees (LAR). A social interview is conducted with the applicants; an individual integration plan is drafted; and, given the approval by the Integration Committee3, a contract for participation in the Program is signed between the participant and SAR’s Chairperson.

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2 National Strategy on Migration, Asylum and Integration (2011-2020)

3 The Integration Committee is chaired by the SAR’s Deputy Chairperson; its members are representatives of the IC, SAR’s Administrative, Legal and Information Services and Financial and Economic Activities Directorate, SAR’s specialized administration, and representatives of the partner non-governmental organizations. This committee endorses the annual plan for the implementation of the 2011-2013 NPIRRB. Where necessary, the Committee proposes to SAR’s Chairperson the updating of the eligibility criteria and the package of integration measures. It examines and approves, within two months, the applications filed for involvement in the NPIRRB, the integration plans, the draft contracts. In the event of specific individual cases, the Committee comes up with a decision. Furthermore, it advances proposals to SAR’s Chairperson concerning contracts to be concluded with the approved applicants. The Committee draws up annual reports on its activity which are submitted to SAR’s Chairperson.
The participants in the Program are obliged to regularly attend Bulgarian language courses, social and cultural counselling, and vocational training in the course of 1 year.

The National Program includes the following integration measures:

- **600 classes of Bulgarian language training.** The Internal Regulation provides for groups of 6-10 participants. Where the trainees – refugee and humanitarian status holders – are fewer than 6, the group may be supplemented with asylum-seekers. The training ends with a final examination;

- **Bulgarian language training with an individual program.** For example, mothers with children aged 1-3 who do not attend a crèche are entitled to have their enrolment postponed by up to one year at their request;

- **200 classes of social orientation and cultural adaptation;**

- **198 classes of vocational training.** The internal rules, as amended in 2013, determine the completion of the Bulgarian language course and the successful final examination as an eligibility requirement for vocational training. The vocational training in the areas of hairdressing, cosmetics, tailoring and computer skills is conducted with groups of 6-10 participants. Where the trainees – refugee and humanitarian status holders – are fewer than 6, the group may be supplemented with asylum-seekers. The training ends with a final examination;

- **Vocational training outside SAR;**

- **Consultations and support in relation to enrolment in vocational training and employment programs;**

- **Activities under the NPIRRB in relation to the integration of aliens who have been granted status under LAR;**

- **Translation/Interpretation services in relation to the exercise of basic rights and opportunities, and other integration-related activities.**

Furthermore, the National Program entitles the participants to integration packages of social aid and social investments over a period of up to one year as from the day of being served the status determination decision under LAR:

- **One-off social aid**, which pursuant to the 2013 amended internal rules is paid out after the fourth month as from the enrolment in the Program. Another new rule is that the specific amount of the one-off social aid is determined on the basis of the *endorsed criteria for granting one-off aid;* this is done after an expert from SAR’s Integration Centre visit the alien’s place of residence and draws up a reasoned proposal for granting one-off aid. The aid proposed is approved by IC’s Director and is coordinated with SAR’s chief accountant in relation to the funds available. All the relevant documents are submitted to SAR’s Chairperson;

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4 Under the terms and within the amount laid down in the Regulation on the Implementation of the Social Assistance Act.
• Targeted aid for the issuance of an identity card up to the amount of the issuing costs;
• A stipend for the period of the Bulgarian language training, social orientation and cultural adaptation, and vocational training – at present BGN 4/day\(^5\);
• Monthly financial support for rental and utility expenses of the individuals \(^6\) enrolled in the Program in the amount of:
  - up to 170 BGN for one person;
  - up to 300 BGN for a 2-member family;
  - up to 350 BGN for a 3-member family;
  - up to 400 BGN for a 4-member family;
  - up to 450 BGN for a family with 5 and more members;
• Monthly health insurance for the participants.\(^7\) Pursuant to the amended internal rules of June 2013 the health insurance contribution shall be paid only for the months during which the Program training is attended. In the event of failure to attend, the payment is terminated;
• Weekly transport cards or tickets for transportation on the municipal public transport over the duration of the Bulgarian language training, social orientation and cultural adaptation, and vocational training, including for children attending courses at the IC\(^8\);
• Payment of kindergarten fees for 10 children / year: 60 BGN / child;
• One-off targeted aid for families whose children enrolled in the first grade at a state or municipal school – for 10 children\(^9\);
• Monthly benefits for children attending Bulgarian state and municipal schools in the amount of 35 BGN /child. The amended internal rules of June 2013 reduced the number of the children covered by this measure from 20 to 10 / year;
• Training materials for the Bulgarian language courses, social orientation and cultural adaptation, and vocational training – for 60 persons/year;
• Training materials for the underage children of those enrolled in the Program who attend a Bulgarian school (exercise notebooks and other learning materials) for 20 children / year;
• Study visits to cultural and historical sites across the country. The amended internal rules reduced the number of children from 60 to 50 / year.

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\(^5\) This stipend is determined in accordance with the Action Plan to the Employment Promotion Act and shall be in the amount of BGN 8 / day.

\(^6\) The instructions from the legal advisors from SAR's Legal Department provide for the monthly rental financial support to be paid on the basis of the rental amount laid down in the rental contract; the payment of utility expenses is not included in this support.

\(^7\) Pursuant to the NHIF Budget Act the health insurance contribution is calculated on the basis of 50% of the minimum insurance income for self-insured individuals.

\(^8\) In practice, tickets are ensured only for the working days when the training is held; such tickets are not provided for children.

\(^9\) Pursuant to the Child Benefits Act.

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A Regulation on the Implementation of the Social Protection Measures for Asylum-seekers or Status Holders with Special Needs was adopted in 2011. This Regulation lays down the terms and conditions for the assistance provided to this group of aliens, the measures for their social protection and integration in the Bulgarian society. The Regulation defines as vulnerable groups: unaccompanied minors, pregnant women, persons aged over 65, single parents accompanied by their minor or underage children, families with 3 and more children, mothers with children aged up to 3, persons with disabilities, victims of serious forms of mental, physical or sexual violence, persons with chronic diseases.

The Integration Centre with SAR operates on the basis of annual and quarterly plans and reports on its performance by means of annual, bi-annual, quarterly and monthly reports.

The Integration Centre with SAR also implements measures under the National Action Plan on the Promotion Gender Equality.

4. Methodology of the Monitoring Report

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

Stratification of the sample

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

- **Origin** -> Syria, Iraq, etc.
- **Status** -> humanitarian status, refugee status;
- **Gender** -> men, women
- **Age** -> adults, underage (minors);
- **Family status** -> single, family with children, family without children, single parent with children, others
- **Vulnerable groups** -> people with disabilities, unaccompanied minors, pregnant women, elderly people.

20 interviews with refugee or humanitarian status holders have been conducted within the scope of the survey. The interviewees have the following countries of origin (of nationality):

- **Syria** 15
- **Iraq** 3
The reason for the imbalance related to the Syrian nationals reflects the ratios within the whole group of refugee and humanitarian status holders involved in the NPIRRB. The Syrians have so far been the most numerous group in the 2013 Program unlike the years 2011 and 2012 when the majority of the beneficiaries came from Iraq.

More than 1/3 of the interviewees belong to a vulnerable group according to the criteria laid down in the Regulation on the Implementation of the Social Protection Measures for Asylum-seekers or Status Holders with Special Needs. There are 5 families among the interviewees. 13 of the respondents are men, and 7 are women.

One of the interviewees is a refugee status holder; all the others are humanitarian status holders, which mirrors the general ratio: less than 1% of all aliens receiving international protection in Bulgaria are refugee status holders; the remaining are humanitarian status holders.

The breakdown of the respondents by age groups is, as follows:

<table>
<thead>
<tr>
<th>Age Group</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to 18</td>
<td>1</td>
</tr>
<tr>
<td>18–30</td>
<td>7</td>
</tr>
<tr>
<td>31–55</td>
<td>12</td>
</tr>
</tbody>
</table>

15 interviews with experts from SAR's IC, governmental institutions and NGOs involved in the execution of the NPIRRB have been conducted.

**Methodology of the sample**

The author reached out to the respondents by taking part in the Age, Gender and Diversity interviews conducted by UNHCR in 2012.10

**Method of registration and on-site tools**

The semi-structured problem-oriented interview was the main method used for information gathering. Three questionnaires were designed – one for refugees who had enrolled in the program and had graduated; one for refugees who either had not enrolled or had dropped out; and one for experts from the

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10 UNHCR conducts annual surveys by age, gender and diversity (belonging to a social group), where governmental institutions and non-governmental organizations jointly set up focus groups with refugees and asylum-seekers.
public administration and NGOs (the State Agency for Refugees with the Council of Ministers, the UN High Commissioner for Refugees, ministries, state and executive agencies, local authorities, independent bodies, non-governmental organizations, refugee organizations). Direct observation and informal interviews were used for the preliminary interviews with experts from the public administration, the participation in the Integration Committee and other working meetings with NGOs and SAR.

In addition to the interviews, some additional sources of information were used, such as: reports, the operational plans and the internal rules of SAR’s IC, the information received from state institutions interviewed for the purpose of this report.

5. Findings from the survey

5.1. Scope of the Program

According to the official statistical data of the State Agency for Refugees, over the period 1 January 2013 – 31 December 2013, 5,232 persons sought international protection in Bulgaria, which is an increase by over 5 times compared to the same reporting period in 2012 when 926 aliens sought protection. 23 persons have been granted refugee status, and 1,250 persons – humanitarian status. The applications of 298 persons have been rejected.

Over the reporting period a total of 100 persons were involved in the NPIRRB, which accounts for less than 7% of the persons who had been granted refugee and humanitarian status by the time of the interview in 2013 (See Table 2 in the Annexes). Out of these as of early November, 23 had graduated the Bulgarian language course, and 7 had graduated vocational training courses. 8 persons were still attending the Bulgarian language course, and 4 in vocational training courses.

Compared to the same reporting period in 2012, the persons enrolled in the Program are by 46 more. The majority of the trainees in the 2012 NPIRRB come from Iraq, followed by Syria. In 2013 the majority of the trainees come from Syria. These are the two countries of origin with the highest number of applications for international protection filed during the reporting period. Similar to 2012, most of the participants are men: a total of 66, and humanitarian status holders: 92 (see Table 3 in the Annexes), which is in line with the general composition of the refugee population.

11 Official website of SAR: http://www.aref.government.bg/?cat=8
12 Official website of SAR: http://www.aref.government.bg/?cat=8
According to SAR data, the year 2013 also marks an increase in the number of families with underage and minor children, as well as of aliens with special needs enrolled in the Program (See Table 4 in the Annexes).

A total of 52 participants dropped off the Program during the reporting period (See Table 5 in the Annexes). According to data from SAR’s IC a list of another 13 participants to be dismissed was drawn up in October. The interviewed staff of SAR’s IC explained that the total number of trainees dismissed in the course of 2013 included also aliens enrolled in the NPIRRB in 2012.

According to the information from the records of the Integration Committee, the main reasons for dismissal are failure to attend after getting a job, unjustified absenteeism from the Bulgarian language courses, travelling abroad for personal family or health reasons, and failure to resume attendance within the authorized non-attendance period, as well as voluntary quitting. There is evidence from records of the Integration Committee showing that trainees are allowed to avail themselves of authorized non-attendance after filing a request; the implications are either the prolongation of the training in the NPIRRB by the period of their absence or the delayed start-up of the training in the NPIRRB.

According to SAR’s staff interviewed, in spite of the growing number of asylum-seekers the number of applicants for enrolment in the NPIRRB has not increased. Many of the trainees drop off the Program due to the small amount of the financial support provided to refugee and humanitarian status holders and the substantial delays in the payment of the support due.

5.1. Analysis and evaluation of the integration measures

SECTION I: MEASURES FOR THE INTEGRATION OF NEWLY RECOGNIZED REFUGEE AND HUMANITARIAN STATUS HOLDERS

This section of the NPIRRB includes 4 measures, three of which are defined as ongoing throughout the operational period of the Program, the fourth one is not defined as such. The goal of the measures planned is to ensure that “each and every refugee, in the course of up to one year after being granted the status, has access to financial support for housing, social assistance, health insurance, Bulgarian language training, social orientation and cultural adaptation, vocational training, translation/interpretation services, and facilitating the exercise of basic rights and opportunities”. An eligibility condition for the access to financial support is the participation of newly recognized refugees in Bulgarian language courses, social orientation or vocational training. According to the NPIRRB, the activities for providing support to newly recognized refugee and humanitarian status holders shall be implemented
As the asylum legal framework was not revised in 2013, the objectives and measures, as defined in the Program, were still limited by the Law on Asylum and Refugees, which stipulates that refugee or humanitarian status holders may be provided with financial support for housing for a period of up to 6 months as from the date of coming into effect of the status granting decision (art. 32, para 3). Hence, SAR's staff provided housing support within the time limit of 6 months. The Bulgarian language course also had a 6-month duration, and was followed by a 3-month vocational training for those who had successfully graduated the language course. This means that the beneficiaries of international protection in most cases availed themselves of the support provided within 9 months, unless the period of participation in the Program was extended due to authorized absence by a decision of the Integration Committee.

According to SAR's staff interviewed, the growing number of asylum-seekers at present makes it ever more imperative to enlarge NPIRRB's scope and cover SAR's territorial units outside the capital city of Sofia. There have been increasingly frequent cases of individuals who upon receiving a status, for example in the Pastrogor Transit Centre, find a job and accommodation in that region and choose to settle there. This is a natural evolution which should be facilitated, as the highest number of refugees is still in the capital city of Sofia where life is more expensive and finding a job and accommodation is more difficult.

Financial support for housing

From the beginning of the year till August 2013 an average of 13 persons/month received financial support for housing (for more information, see Table 7 in the Annexes). All the interviewees enrolled in the Program as of the time of the interview share that the financial support for housing is far from being sufficient in terms of its amount and duration. Another serious issue in 2013 turns out to be the substantial delays in the payment of the benefits due. According to the SAR's staff interviewed the reason for the delays is the Agency itself which does not make the payments to the Bulgarian Red Cross (BRC) in a timely manner. BCR has the responsibility to pay out the benefits to the participants in the Program. The benefits due for June were paid in October 2013, and the ones due for July – in November.

The refugee and humanitarian status holders state that the financial support can hardly cover their accommodation needs, as the benefits are not updated on an annual basis depending on market prices. Most of the interviewees indicate the amount of BGN 300-450 as the monthly rent. The NGO experts interviewed say that even if the amount sufficed to cover the utility bills the expenditures would
not be recognized as eligible by the Integration Committee. The financial support for housing ranges between 115 BGN for a single person to 500 BGN for a family – most of the interviewees pay rents from 300 to 450 BGN. While the NPIRRB envisions the possibility of utility bills being covered by the financial support, the instructions from the legal advisors from SAR’s Legal Department provide for the monthly financial aid for the rent to be determined on the basis of the amount indicated in the rental contract. The support does not cover utility expenses even if the rental amount is less than the monthly amount of the benefit due to the beneficiary. Those who have relatives rely on their financial assistance to pay the utility bills. Others have to cope on their own; thus, it is often the case that families with many children cannot afford but rent a one-room flat. As the Program does not ensure financial aid for furniture and basic utensils, the beneficiaries rely mainly on the support of the Council of Refugee Women in Bulgaria. The Council organizes campaigns for the donation of second-hand clothes, utensils and furniture for needy refugees. The requirement for a deposit rent is yet another challenge for the financial status of those newly recognized refugees who cannot rely on addition financial help from relatives living abroad. One of the interviewees said: “There we were threatened to die from the bullet, here – from hunger.”

Another serious issue is the fact that 2013 is the second consecutive year when due to the time needed for processing the documentation, the payment of the financial support started 2 months after enrolment in the Program; hence, the payments were substantially delayed – up to 4 months, according to the refugee and humanitarian status holders interviewed. This is one of the reasons why some participants dropped off the Program, as they were forced to find a job in order to ensure their families’ livelihood.

**Health insurance**

The interviewees participating in the NPIRRB had health insurance and most of them had a GP. The refugees interviewed in 2013 share some problems that were also identified in 2012:

- **Suspension of health insurance rights** due to changing the Alien’s Personal Number to a Unique Civil Number on the ID, and, in some cases, due to previous negative decisions on applications for international protection. According to SAR’s staff interviewed, the Agency already has 4 experts who have been trained and are in charge of refugee and humanitarian status holders. Nevertheless, this will not contribute to optimizing the procedure, as the Program beneficiaries have to turn up in person for the registration and submit all the relevant documents; SAR’s employee accompanying them has to stay with them while the registration takes place;

- **Insufficient information about the Bulgarian system in a language understandable to refugees.**
The majority of the interviewees share that they are very much concerned about their health insurance contributions after the end of their involvement in the NPIRRB. Another major concern is the lack of financial means to buy medication.

Social assistance

The new internal rules provide for the one-off social benefit to be paid right after enrolment in the Program, instead of in the fourth month. According to SAR’s staff the purpose of this change is to monitor regular attendance, cases of unauthorized absence, how transportation expenses are covered – in case the trainees have their own financial means and cover the transportation expenses, they are not eligible for the benefit. The possibility to further delay the provision of this financial aid complicates the participants’ financial situation, as the enrolment is the most costly stage of the Program due to the need to pay the deposit rent, the fee of the real estate agent, to provide furniture and utensils, etc. The data from RAS’s IC show that the one-off social aid has not been paid by virtue of an oral order by SAR's management.

At the session of the Integration Committee in early 2012, the NGOs proposed updating the financial estimates for the execution of the National Program for the Integration of Refugees in 2012, in particular increasing the amount of the allowance (the stipend) received by refugees from 4 to 8 BGN. The refugees’ allowance is calculated on the basis of the amount of the stipend for unemployed persons, as endorsed by the government and as determined on an annual basis in the National Employment Action Plan. In 2012 the stipend was set at 8 BGN, which served as grounds for changing the amount of the refugees' stipend. While the relevant documentation related to the 2012 National Employment Plan was submitted to SAR’s management in order for the latter to examine it and put forward a proposal for adjustments in SAR’s financial estimates for 2012, the expected adjustments were not made either in 2012, or as of November 2013.

According to SAR's staff interviewed, this is due to the fact that the whole 2013 budget had been spent by May 2013 which resulted in the need to make savings. Hopes have been shared that this situation could serve as grounds to justify demands for a higher amount of the stipend.

One of the interviewees complains about living in his uncle's flat; thus, being unable to present a rental contract, he was considered ineligible for any financial support, including a stipend.

The interviewees point out that the transport tickets/cards envisaged in the NPIRRB were provided only for the weeks when Bulgarian language courses and vocational training were held. One of them complains about having failed to attend Bulgarian language classes on 2 days, which deprived him of the weekly
Another concern shared is the ongoing lack of transport cards/tickets for children.

**Bulgarian language courses, social orientation and cultural adaptation**

An average of 55 persons attended the Bulgarian language course during the reporting period (see Tables 8 and 9 in the Annexes). 23 refugee and humanitarian status holders have successfully graduated and have received certificates.

The majority of the interviewees assess the Bulgarian language training as satisfactory; however, they emphasize the insufficient duration of the course. This puts at risk the integration of refugee and humanitarian status holders who have been through the NPIRRB, as mastering the Bulgarian language is a prerequisite for employment, hence for ensuring accommodation.

In the course of 2013, IC’s Bulgarian language training was conducted by 4 trainers in 3 groups of adults, including beneficiaries of the Program and asylum-seekers. As of early November, additional Bulgarian language training was ensured for 20 children aged 5-14 by means of another 2 groups whose training was conducted by volunteers. On 16 October 2013 yet another Bulgarian language group of 15 adults aged 35-60 was set up at the IC in cooperation with Dia-Sport under the Grundtvig Program. The participants were enabled to practice their language knowledge with the aim to acquire practical skills. In September 2013 an interactive Bulgarian language facility with a capacity of 8 persons was equipped under the 2012 ERF program;

In response to the recommendations made in the 2012 Monitoring Report, in 2013 the trainees in the Bulgarian language course were regrouped on the basis of their linguistic competence; thus, an advanced group was set up, and language practice was ensured – practicing the language at the municipality, at the marketplace, on the bus.

In 2013, similar to 2012, the NPIRRB did not deliver any social orientation and cultural adaptation training for newly recognized beneficiaries, even though such training is one of the mandatory requirements in the contract signed with the participants. According to SAR's staff interviewed the Program budget did not include funding for that purpose. While the Bulgarian language teachers at the IC did their best to cover a part of this training during the Bulgarian language classes, this option cannot substitute the targeted study visits to museums, sightseeing of the city and trips around the country, which was the approach applied during the previous programming period. The experts at SAR's IC sought to establish cooperation with NGOs for that purpose, which, however, failed due to the lack of funding. As a result of the increasing migration inflows, a growing number of refugees express their wish to act as volunteers;
nevertheless, the appropriate person who would have the capacity to conduct this training is still lacking.

In mid 2013 the A25 Cultural Foundation started implementing a project funded by the NGO Support Program in Bulgaria under the Financial Mechanism of the European Economic Area. A 9-month program for the cultural orientation of refugees and asylum-seekers was developed; the program envisages information provision and involvement in various cultural activities in conformity with the social orientation and cultural adaptation courses included in the National Program for the Integration of Refugees.

**Vocational training**

The findings from the interviews with the beneficiaries of international protection show that the majority of the men have secondary or higher education. As for their professions, these include engineers, mechanics, business administration specialists, economists, tailors, cooks. The women interviewed are for the most part either housewives or have not had a job in conformity with their qualifications, hence, they do not have any practical experience. In cases of family reunification, it is usually the husband that ensures the family livelihood, while the wife has to adapt. The women interviewed say that their husbands would agree that they take up a job.

The majority of the interviewees share that they did not have the diplomas with themselves in Bulgaria. Few of them speak English.

Those interviewees who had a job during the RSDP in most cases have not worked on the basis of an employment contract; they found employment with the help of compatriots and Catholic and Protestant churches. As of the time of the interview none of them was employed. Most of the interviewees were still attending the Bulgarian language course and had not yet been through vocational training.

The total number of trainees who sat for exams during the reporting period January-October 2013 is 7. Out of them, 13 are asylum-seekers and 7 are beneficiaries of international protection (2 of them are participants in the NPIRRB, 1 is not involved in the Program). All of them have graduated successfully. The vocational training was suspended for 2 months by virtue of an order by SAR’s management and was resumed on 16 October 2013. Four persons were still attending vocational training as of early November 2013 (see Table 9 about the number of persons attending vocational training per month in the Annexes).

In response to the question “What would you like to work after graduating the program?”, most of the respondents say that they would take up any job irrespective of their professional qualifications. Fewer of the interviewees who have a specific professional background share that they want to find a job in
conformity with their professional skills; they have taken actions to have their diplomas legalized and their Bulgarian language competence certified.

Issues identified in this area:

- The financial support for housing is discontinued after the completion of the 6-month Bulgarian language training when the participants become eligible for enrolment in vocational training courses;
- There is no computer skills training course running as of the time of the interview. SAR’s staff interviewed explain that while SAR already had a room equipped with computers with ERF funding, this training course had not started as of early November;
- There is not a sufficient variety of vocation training options;
- There are no training courses in entrepreneurship and starting up one’s own business. Such an initiative was financed under the 2011 AP, priority 1, action D2 “Support for refugees’ access to employment and small-sized business by means of training in key employment skills (spirit of initiative and leadership skills), training in designing and developing small- and medium-sized business projects, specialized job fairs with the participation of potential employers, etc.”. The project was implemented by the Forum Association: contract 1900/06.04.2012, with a timeframe till 30 June 2013 and a value of BGN 45,634.68. According to the NGO experts interviewed, the project activities delivered have not facilitated the beneficiaries’ professional performance.

According to the majority of the interviewees the best way to ensure one’s integration in Bulgaria is by finding a job.

Translation/Interpretation services and support for the exercise of basic rights and opportunities

There are no changes in terms of this measure compared to 2012. The interviews conducted show that the funds available for translation from and into rare languages continue to be extremely limited. As there are no translators on the payroll of SAR’s IC, translation services are provided by the Registration-and-Reception Centre in Sofia. This implies difficulties in the communication with newly recognized refugees and humanitarian status holders. While the staff of SAR’s IC provide support when solicited, the most frequent source of information are compatriots and NGOs, such as the Council of Refugee Women and the Bulgarian Red Cross.

Implementation of a package of measures for the integration of newly recognized refugee and humanitarian status holders from vulnerable groups
Over recent years there has been a stable trend of an increase in the number of refugee and humanitarian status holders from vulnerable groups, which is also indicated in the reports of SAR’s IC. A Regulation on the Implementation of the Social Protection Measures for Persons with Special Needs who seek or have received protection was adopted in 2011. This Regulation lays down the terms and procedure for providing assistance to this group of aliens, and the measures for their social protection and integration in the Bulgarian society.

Similar to 2012, the measures provided do not differ substantially from the ones with respect to the other newly recognized refugees and humanitarian status holders. IC’s experts offered consultations and advice to the beneficiaries of international protection with special needs on any issues regarding education, social assistance, professional qualifications, health insurance, issuance of documents. Where needed or deemed appropriate by IC’s experts, vulnerable persons were referred to ACET for psychological help and psychiatric consultations.

Vulnerable persons were referred to Bulgarian language courses and vocational training and retraining. Refugee and humanitarian status holders with special needs had an individual integration plan drawn up which does not differ in any way from the one for the other newly recognized beneficiaries, except for the explicit indication of belonging to a vulnerable group. One of the few specialized measures at present are:

- The possibility for the so-called postponed enrolment in the NPIRRB within a time limit of up to 1 year;
- Another specialized measure pertains to the entitlement of refugee or humanitarian status holders with special needs who have been registered in the Register of Aliens with Special Needs to apply for an extension of the accommodation in the Registration-and-Reception Centre by up to 6 months as from the serving of the refugee or humanitarian status determination decision;
- In the case of unaccompanied minors, the staff facilitate their ad-hoc placement in specialized institutions (homes for children deprived of parental care) with the Ministry of Education and Science (MES) on the grounds of Art. 33, paragraphs 1 and 2 of the Law on Asylum and Refugees.

From the beginning of 2013 till the end of September, according to SAR’s IC a total of 127 unaccompanied minors filed applications for international protection (see Table 6 in the Annexes). As of the end of October, their number stood at 74. Out of them 24 unaccompanied minor refugee or humanitarian status holders were using IC’s services, 3 of them being enrolled in an evening secondary school and 1 in an Iraqi school.
One of the experts in SAR’s IC ensures the maintenance of an electronic register (Excel sheet) of aliens with special needs who seek or have received protection; this register contains personal data, information about actions taken, status, etc.

As the RRC does not have a dedicated social worker in charge only of vulnerable asylum-seekers, most of the workload related to such persons is borne by IC’s staff. They coordinate their activities with the medical facility, as these individuals need to be referred to registration with a GP. For example, individuals with chronic diseases should have a prescription logbook, which can be issued only by a GP. It often happens that such persons seek the help of IC’s staff, as they are not able to fill in the registration form for the assignment of a GP.

**Implementation of a package of measures for the integration of minor refugees**

In spite of the limited human and financial resources for translation services with rare languages, the staff of SAR’s IC did their best to ensure the optimal implementation of the measures planned for the integration of minor refugee and humanitarian status holders. All the interviewees point out that they received information and counselling from IC’s staff and the Council of Refugee Women on issues concerning their education in Bulgaria. 7 children had their education levels recognized on the basis of documents issued by schools in other countries in conformity with Ordinance No 2 of 2003. Nine children sat for an examination at the Regional Inspectorate of Education (RIE) for certifying the level of their Bulgarian language competence (aged 7-18). Out of them 3 unaccompanied children were enrolled in an evening secondary school. As of the time of the survey, a total of 26 children were receiving training at the IC, 9 of them being unaccompanied minors.

A total of 42 children attended Bulgarian schools during the period January-June 2013. In September 2013, 4 children were enrolled in preparatory groups, and 18 children – in the first grade for the 2013/2014 school year. Afternoon tuition was ensured for the children attending Bulgarian schools. The children were provided with additional training in the Bulgarian language and other subject matters by volunteers from CVS-Bulgaria, the Peace Corpse and Caritas Association.

The parents interviewed also identify the issue of their children being enrolled in a lower grade which does not conform to their age in the year 2013. This is a disincentive and makes children reluctant to attend school. The only way out of this situation for many parents is enrolling their children either in the Iraqi school or the Palestinian one; as these schools, however, are private, not all the parents can afford them. It very often happens that the parents need to rely on support from their compatriots.
There is a case registered where a child refused to attend classes during the first two weeks at school, as her classmates were rude to her. According the girl’s mother: “The children don’t like her, because she is Arab.” The mother tells that her daughter was afraid, because her classmates had beaten her.

One of the refugee women interviewed tells that the school headmaster refused to enrol her child; thus, the child was enrolled in a school located farther away, which required using two transportation means to reach the school.

The participants in the Program interviewed who have children at school age share that as a whole they are assisted by Bulgarian families and compatriots from whom they receive clothes and textbooks.

On 25 September 2012 the State Agency for Refugees, in its capacity of the Responsible Authority for the European Refugee Fund, signed a contract 01-5020/25.09.2012 under Subsection C4 of Action C of Priority 1 of the 2011 ERF Annual Program “Measures for supporting the integration of minor and underage refugees” with the Caritas-Sofia Association. The total budget amounted to BGN 29,293.87. The project was completed on 30 June 2013 and its implementation was assessed as successful by the NGO representatives interviewed.

An issue has been identified in relation to unaccompanied minors. The new internal rules provide for the assignment of a legal guardian for such minors as an eligibility requirement for inclusion in the Program. However, due to some difficulties with the procedure for assigning a legal guardian, these children do not meet the eligibility requirement and are, thus, left without any financial support (for more information, see Section II, Legislative Measures). SAR does not set this requirement with respect to children who are in the procedure. Such children are enabled to attend Bulgarian language courses as part of the adults’ groups at SAR’s IC.

In early August 2013, a protected area was designated for unaccompanied minors at the Sofia RRC: 8 rooms with individual sanitary facilities and a shared kitchen with refrigerators. The area has a separate guarded entrance.

In 2013 the UNHCR Representation in Bulgaria initiated a pilot survey and monitoring aimed at reviewing the effective legislation and the current practices across the country. The purpose was to gather up-to-date information about the conditions for the reception and integration of unaccompanied minors who seek or have received protection, and make proposal for improving these conditions. The relevant activities were conducted by two independent experts in close cooperation with SAR experts, the UNHCR Representation in Bulgaria, the State Agency for Child Protection, the Child Protection Department with the Social Assistance Directorate in the Krasno selo neighbourhood in the city of Sofia, and non-governmental organizations. A number of working meetings were held to discuss the draft of the Map for monitoring the conditions for the reception and
social protection of unaccompanied minors who seek or have received protection. Meetings with 15 unaccompanied minors from Syria, Cote d'Ivoire, Mali, Cameroon and stateless children took place in the presence of SAR experts and with the consent of a social worker from the Child Protection Department with the Social Assistance Directorate in the Krasno selo neighbourhood; individual monitoring cards were filled in. The results from the survey and monitoring are being processed and analysed.

Development and application of mediation programs in relation to the exercise of refugees’ basic rights and opportunities

This measure had not been delivered as of the time of the monitoring. Such programs have been developed only with respect to asylum-seekers with financial support from the European Refugee Fund.

An example of best practice in terms of ensuring the initial package of integration measures and successful inter-agency coordination is set by the Portuguese High Commission for Migration and Intercultural Dialogue (ACIDI). The Commission has defined seven principles which serve as the foundation for setting centres operating on the basis of the one-stop-shop principle in the area of integration measures13.

SECTION II: LEGISLATIVE MEASURES

This section of the Program includes 4 measures. While the deadline for the implementation of two of them has expired, they have not been delivered. The other two ones are scheduled for 2013. The objective is to ensure updating and streamlining of the legal framework which defines refugees’ rights and obligations with a view to their integration in the Bulgaria society.

Analysis of the domestic legislation and proposals for amendments to the now effective legislation regulating refugees’ rights and obligations

While proposals regarding changes in the provisions LAR related to refugees' integration were drafted and submitted in 2012, as of early November 2013 these proposals had not been taken into consideration by SAR's management.\(^{14}\)

**Developing and initiating legislative changes aimed at ensuring a legal guardian for unaccompanied minor refugees**

In 2013 SAR's IC initiated a number of meetings to address this topic with the State Agency for Child Protection (SACP), the Agency for Social Assistance (ASA), representatives of the local authorities and NGOs. According to SAR’s experts interviewed, the parameters of the arrangements for assigning a legal guardian for minor refugees have been defined; these parameters will require changes in quite a few legal acts. According to information from SACP’s experts, a working group has already been set up for the purpose of drafting proposals for amendments to the Family Code.

The main issue still relates as to who is eligible to be assigned as a legal guardian for such children. As of the time of the survey, representatives of the refugee community residing in Bulgaria could be assigned as guardians; however, the experts consider this measure as a temporary one, as it is not regulated by law. SAR's staff coordinated this procedure with experts from the Ovcha pupel and Krasno selo municipalities in the city of Sofia, the Social Assistance Directorate and SACP. The other municipalities, however, are not familiar with this temporary measure and are reluctant to issue certificates for guardianship. IC’s experts did their best to address this issue with the relevant officials at the municipalities in an attempt to encourage them to use this temporary measure, even though it is not regulated in the Family Code. This is the only option for children to be issued identity documents. There were cases where the children themselves named the person who they wished to be their guardian. Under this procedure, for example, a representative of the Afghani community became the guardian for 10

\(^{14}\) Proposals for amendments to LAR submitted to IC's Director on 22 November 2012:

- Amendments to Art. 26 of LAR and, respectively, Ordinance No 3 of 27 July 2007: minors who seek or have received international protection shall be entitled to training at the accommodation centers or the integration centers of the State Agency for Refugees, as well as to education at the state and municipal schools in the Republic of Bulgaria;
- The access to the education system should be under the terms and procedure applicable to Bulgarian nationals. It should be explicitly regulated that adult aliens who have been granted protection shall be entitled to education and vocational training under the terms and procedure applicable to Bulgarian nationals;
- Article 29 of LAR should provide for asylum-seekers' right to have access to vocational training;
- Amendments to Article 32, which will allow refugee or humanitarian status holders to be provided with financial support for housing over the period of their participation in programs and projects implemented by the State Agency for Refugees. Art. 53 should be supplemented with a new item stipulating that SAR shall apply measures for the integration and social adaptation of newly recognized refugee and humanitarian status holders by involving them in programs and projects for at least one year.
unaccompanied children from Afghanistan. Employees from Sofia RCC have assumed the commitment to try and find other representatives of the refugee communities who might be willing to become guardians.

As of the time of the survey, according to SACP’s data all the unaccompanied minors were accommodated either in specialized institutions or in family-type accommodation centres. SACP and SAR cooperate in relation to inquiries and exchange information and methodological assistance on a regular basis. In cases where interpretation is needed for children whose care has been assigned to Child Protection Departments (CPD), SACP uses the services of SAR’s pool of interpreters over the telephone. As upon reaching the border, not all the children become aware of the entitlement to lodge an application for protection, CPD’s staff provide the children once again with clarifications about their rights, as a result of which most of them make up their mind to apply for protection. The staff assist with the filing of the applications which, via MOI’s authorities, are referred to SAR. Arrangements are made for placement of the children at a registration-and-reception centre and for their transportation thereto. SACP has provided the CPDs with information (from SAR) about the addresses at which the children who are in the procedure are registered. The CPDs visit the relevant addresses to verify whether the children live there and with whom. According to the experts interviewed there have been cases where the children have not been found.

By virtue of a decision of the European Commission of 3 June 2013 regarding the approval of the 2013 ERF Annual Program and the co-financing from ERF for 2013, the proposal of SAR’s experts about a pilot project “Protected Space for the reception, accommodation and integration of unaccompanied minors” was approved. The project will start up on 1 June 2014. The protected space will be designated on the territory of the Sofia RRC and the social service will be delivered within 18 months. The activities will be outsourced to non-governmental organizations which offer services for children at risk; the care for the unaccompanied minors will be ensured by a multi-disciplinary team of specialists. The centre will have the capacity to accommodate 10-12 unaccompanied children. According to SAR’s experts, if this project proves to be best practice and sustainability is ensured, the arrangement could be regulated by law and thus serve as a basis for the long-term solution of the issue with the accommodation and legal guardianship for unaccompanied refugee children.

On 26 November 2013 a cooperation agreement about improving children’s access to their rights was signed between SAR and SACP. This agreement provides for measures to be taken to ensure the inclusion of unaccompanied children in the Integration Program with priority, the provision of social services (especially for children in the age group 16-18), speeding up the process of amending the procedure laid down in the Family Code, etc. Furthermore, this agreement will regulate the access of SACP’s teams to SAR’s accommodation centres with a view to monitoring, providing support and consultations about the observance of children’s rights and interests.
Developing and applying measures for raising the awareness and assisting refugees in preparing and applying for Bulgarian citizenship

In 2012 the Association for the Integration on Refugees and Migrants (AIRM) organized an information session on Acquiring Bulgarian Citizenship by Refugee and Humanitarian Status Holders in the Republic of Bulgaria. The information session was attended by 20 refugee and humanitarian status holders who were acquainted with the eligibility conditions for applying for Bulgarian citizenship and the documents to be attached to the application filed with the Ministry of Justice. The participants were given an information leaflet produced by AIRM with the financial support of UNHCR Representation. Such information sessions were not organized in 2013.

Initiating legislative changes aimed at regulating the possibility for additional Bulgarian language training for children who have been granted protection and who attend Bulgarian public and municipal schools

The latest amendments of the National Education Act of 2 August 2013 broaden the scope of Art. 43, para 2 of the Law, which provides for additional educational options for children who are at risk of dropping out of school. According to the interviewed experts from the Ministry of Education and Science (MES), this category of children at risk also includes refugee children due to the linguistic barrier they face initially. Such additional education options are individual programs for psychological and pedagogical impact, additional extra-curriculum tuition during regular classes and vacations, out-of-school activities relevant to the student’s needs and interests, consultations and counselling about vocational training in conformity with the student’s age and interests. These activities are organized with the support of the RIE, the municipalities, the school boards of trustees, and other organizations and bodies. Such measures are also taken with respect to children enrolled in the first grade who either do not have a document to certify the completion of the preparatory course or are assessed as not being prepared for school. At the initial stage of primary education these additional measures may also include additional Bulgarian language training. Furthermore, refugee children are entitled to avail themselves of the mainstream educational measure: free textbooks and exercise notebooks, the arrangements for daylong tuition on study days for children in grades 1-4 in state and municipal schools.

In reality, however, by virtue of a decision issued by the RIE, the students who are referred to a specific school are issued a document indicating that they need to be provided with additional training in the Bulgarian language and other subject matters. Due to their limited financial resources, the schools offer only 2 hours of

\[15\] AIRM's Report on the implementation of the National Program for the Integration of Refugees in Bulgaria over the period January – September 2012, p. 3.
\[16\] Art. 114, para 1 of the Regulation for the Implementation of the National education Act.
\[17\] Art. 114, para 2 of the Regulation for the Implementation of the National education Act.
consultations per subject matter for all the students, i.e. they are not earmarked for refugee children.

According to MSE’s experts interviewed, the program budgeting mechanisms under the national programs can also be used for the educational integration of refugee children. Refugee children who experience difficulties with the training material, can avail themselves of some of the additional measures in the national programs “The school – the students’ territory”, “Care for each student”, “Attending school without absences”. The experts quote as an example School No 66 which has set up a preparatory group of refugee children and first-grade children. The schools with higher numbers of refugee children can apply for additional funding under these programs.

The Ministry of Science and Education has been designated as the Managing Authority for the Science and Education for Intelligent Growth OP over the 2014-2020 programming period. The operational axis 3 of the draft program “Educational environment for active social inclusion” identifies a specific objective: “Efficient integration in the educational system of children, students and adolescents from ethnic minorities, from migrant and refugee families”, which will also provide opportunities for additional education measures.

The project “ACCESS – a program for ensuring access to the national education system for asylum-seekers and refugees”[18] financed from ERF and implemented by Caritas Bulgaria will also contribute to improving refugee children’s access to additional Bulgarian language training, as well as to initiating legislative changes (for more information, see Section V, Education).

SECTION III. HOUSING

This section includes 5 ongoing measures. The objective is to ensure conditions for refugees’ housing.

Provision of housing services to refugees: information, support in relation to administrative services, address registration, legal aid and consultations

All the interviewees lived in rented lodgings, which they had found either with the support of their compatriots or via a real estate agency. As of the time of the interview, one of the participants was living in a caravan for which he paid BGN 200/month. All of them had rental contracts. When the interviewees need help, consultations or are faced with a problem, they usually approach their compatriots, the Council of Refugee Women, the Bulgarian Helsinki Committee (BHC) and the Bulgarian Red Cross (BRC). The chief expert at the IC in charge of

[18] [http://www.caritas-bg.org/web/bg/caritas-bulgaria/deinosti/aktualni/item/3413-dostap-project]
this measure also seeks the assistance of BHC and BRC, in particular in relation to refugees with special needs.

The monitoring identified numerous difficulties that refugee and humanitarian status holders faced in terms of housing in 2013. The landlords are often reluctant to sign a rental contract with the participants in the Program, as having an official contract implies taxation obligations. Unless the participants in the NPIRRB have a contract, they are not eligible for financial housing support and are, therefore, forced to look for other lodgings. Furthermore, the interviewees share that while the landlords are obliged to attend the address registration of their tenants at the municipality, they are reluctant to do so. One of the interviewees complains that his landlord asked for an additional fee in the amount of BGN 75 in order to accompany him to the municipality for address registration.

The housing issue was further complicated in 2013 due to the shortened timeframe – from 14 to 5 days – within which newly recognized beneficiaries of international protection have to leave the RCC after receiving the status. Bearing in mind that the 14-day timeframe for leaving SAR’s accommodation facilities has already been identified as one of the risk factors for homelessness among refugee and humanitarian status holders, this shortening of the timeframe will make the situation even more precarious. Some interviewees point out that none of them was able to ensure their accommodation within the 14-day timeframe due to the simple fact that renting a flat takes at least one month; thus, they had to file an application for the extension of their stay on SAR’s premises.

**Studying European best practices in the area of housing for refugees and the possibilities for involving them in housing projects for disadvantaged people**

In early 2013 the Bulgarian Council on Refugees and Migrants initiated a working meeting on the issue of refugees’ housing in Bulgaria. The meeting was attended by representatives of SAR, NGOs, UNHCR, and Sofia Municipality who discussed both best practices and challenges in relation to refugees’ accommodation.

As a result of the issues addressed, the meeting reached some conclusions in respect of:

1. **The state of the housing sector in Bulgaria** which impedes the solution of the housing issue for refugees:
   - The share of municipal housing is extremely low (3 %);
   - For most young families and representatives of vulnerable groups owning a flat/house or even renting municipal lodgings is impossible;

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• The share of state budget funds allocated for housing is extremely small—below 1% of the state budget;

2. The challenges in terms of accommodation faced by the beneficiaries of international protection:

• Some landlords are reluctant to rent their lodgings to refugees due to race and/or nationality considerations;

• The landlords increase the amount of the rent and the deposit (in most cases a deposit for 6 months), as they perceive a higher risk in having a refugee tenant;

• Some landlords either refuse to sign a contract or indicate a lower rental amount in the contract, which deprives refugees of the possibility to seek redress in case the landlord fails to meet their contractual obligations, and of the entitlement to receive the due financial housing support under the NPIRRB;

• The following two groups are deprived of the possibility to receive financial support for housing: 1) Newly recognized refugee and humanitarian status holders who are unable to attend the mandatory Bulgarian language training courses and vocational training due to family, age and health reasons; 2) Newly recognized refugee and humanitarian status holders who live outside the capital city of Sofia which is the only city where the NPIRRB is applied;

• An issue which has not been solved is the impossibility for refugees to apply for municipal housing and benefit from such accommodation after being served the status decision. There are two obstacles: 1) Legislative issues: the ordinances issued by the municipal councils set an eligibility requirement for Bulgarian citizenship of at least one member of the family and for a specific period of permanent registration on the territory of the relevant municipality; 2) The lack of vacant municipal lodgings, especially in the cities.

Proposals from the meeting:

1. Develop a state policy for refugees’ housing on the territory of Bulgaria which will encourage, by means of targeted financing, the involvement of municipalities in this process. The latter implies that the municipality in which the refugee has chosen to settle will receive funds from the state budget for integration purposes and thus will have both an interest vested and the necessary financial resources to solve the issues; 2. Develop projects for refugees’ accommodation on the territory of municipalities which have vacant housing to offer, and for financial support from the European Refugee Fund for the renovation and equipment of a housing fund designated for the accommodation of refugees and socially disadvantaged Bulgarian nationals whose housing needs have been tested;
3. Involve the Bulgarian municipalities in the development and implementation of the policies and measures aimed at refugees; integration in Bulgaria;
4. Develop information materials regarding the rights of refugee and humanitarian status holders, their way of living and culture, which will be disseminated among potential landowners for awareness-raising purposes.

Inclusion of refugees as a vulnerable social group in the development of strategies and programs for ensuring access to housing for low-income families

This measure has not been delivered, as it is not considered topical. According to SAR's staff interviewed, one of the conclusions drawn at the working meeting on the issue of refugees' housing in Bulgaria is that identifying refugees as a separate vulnerable group would be inappropriate; hence, the appropriate approach would be mainstreaming.

Inclusion of housing for refugees as a priority in the ERF annual programs

The issue of refugees’ housing has been included as a priority action in the recent ERF annual programs for the years 2010, 2011, 2012 and 2013.20 While SAR's IC developed some indicative proposals, the competitions have not been successful so far: either the applicants have proved to be unprepared for the implementation of the projects submitted or no applications have been filed.

Exploring the possibilities for cooperation and the development of joint projects with municipalities, ministries, agencies and non-governmental organizations for the accommodation of refugees in available housing which is uninhabited and can be renovated

According to the interviewed experts from SAR's IC, the Agency does cooperate with the Ministry of Interior, the Ministry of Labour and Social Policy, the Social Assistance Agency, and the State Agency for Child Protection at the expert level. There is, however, no cooperation with the municipalities in spite of the efforts made to involve them in the process of refugees’ integration by means of working meetings and seminars.

The interviewed experts from Sofia Municipality explain that at present the municipality is focused on “a number of actions aimed at ensuring public order and safety for the citizens in the neighbourhoods with refugee centres”. Measures are to be designed for solving the difficulties refugees face after receiving the status. At present the number of refugees accommodated at the so-called external addresses is being establish with support from the Sofia

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20 The report "National legislation, practices and challenges in relation to refugees’ housing in the Republic of Bulgaria” presented by Maya Getova at the working meeting on refugees’ housing in Bulgaria on 28 March, organized by the Bulgarian Council on Refugees and Migrants.
Directorate of Interior; based on the findings, the necessary social, health, educational, etc. actions will be taken to facilitate integration at the municipal level. A concept is being developed for the purpose of drafting an action plan with the relevant financial and structural justification thereto, which will lay down the necessary activities to be carried out by Sofia Municipality in regard to refugees' integration and “whose timeframe will be directly dependent on the refugee process”.

An example of best practice in this respect is set by the Spirit Project of the Finnish Red Cross, which encourages municipalities to be actively involved in the process of the reception and integration of asylum-seekers and refugees in Finland. The project has the following achievements:
- A well-developed network of volunteers, a manual for volunteer activities for the reception and integration of asylum-seekers and refugees at the local level – thus support at the local level has been ensured for refugees in the integration process;
- Information seminars for municipalities;
- An awareness-raising campaign targeting the local community, incl. schools;
- A training module designed for municipalities, schools and other stakeholders, whose purpose is to raise the awareness at the local level about the challenges refugees are faced with and the mechanisms used to meet their needs.

SECTION IV: EMPLOYMENT

This section of the NPIIRRBR includes 8 ongoing measures. The objective is to improve refugees’ access to employment and professional development

**Intermediation for facilitating inclusion in the labour market, including programs for literacy, training and retraining, employment and promotion of independent business activities**

Due to the increased refugee inflow into the country, the Employment Agency (EA) has dispatched a letter to all the Employment Office Directorates (EOD) notifying them of the need to take measures for stepping up the activities with refugee and humanitarian status holders. The directors of the Regional Employment Services have issued instructions to the directors of EODs, the heads of departments and all the employment intermediaries regarding the observance of the agreement between SAR and EA and the implementation of the provisions of the Employment Promotion Act and LAR. The Employment Agency will require that information about the target group of refugees is submitted on a 3-month basis instead of on a 6-month basis, as it used to be.

**2013**

According to information provided by the Employment Agency, as of 30 September 2013 the EODs had registered 16 refugees and humanitarian status holders, out of whom 16 persons in the city of Sofia by the EODs in the neighbourhoods of Lyulin, Serdika, Iztok and Vazrajdane; and 1 person by the Bourgas Regional Employment Service Directorate in Nova Zagora. The beneficiaries registered come from 7 countries: 6 from Iraq, 2 from Nigeria, 2 from Ethiopia, 2 from Armenia, 1 from Mali, and 1 from Afghanistan. Only 4 persons were registered in the third quarter of 2013. As of October 2013, 1 person had refused to receive support from the Sofia EOD for taking up a job.22

EA’s staff interviewed compare the above data to the data as of the end of 2012 when the number of persons registered stood at 18. According to the interviewees, the individuals concerned are not sufficiently motivated, which requires that this process be facilitated by social mediators. Such a measure – social mediators for employment purposes – has already been applied with respect to other unemployed persons in order to encourage them to use EA’s mediation services. As refugees are disadvantaged due to the linguistic barrier, they could be included in the scope of this program. As of the time of the survey, EA was involved as a beneficiary in the Let Us Succeed Together Project23 under which 250 employment intermediaries provided services; this project could also be applied to facilitate the integration of refugee and humanitarian status holders on the labour market.

According to EA’s staff interviewed, the Agreement on cooperation and joint activities signed between EA and SAR on 22 December 2011 was being implemented; the purpose of the Agreement is to contribute to improving the refugees’ access to employment and professional development. Pursuant to the Agreement, the refugees registered with the EODs shall not be included in any other forms of employment or training during the period of their involvement in the NPIRRB. Similarly, the individuals who have graduated a Bulgarian language course at SAR’s IC can enrol in training for acquiring the first qualifications degree. EA and RAS have agreed on the form of an official certificate to be submitted by refugees to the relevant EAD; this certificate will be taken into consideration in processing the refugee’s application. The reason for introducing this certificate is the fact that secondary education is a requirement for most of the 2nd-degree professions; the majority of asylum-seekers and refugees, however, do not have a document to certify this educational background.

Including refugees in the examinations for the verification of the level of professional qualification at the National Chamber of Crafts

The experts from SAR’s IC claim that there is a mechanism in place. IC has been providing support to refugees who wish to sit for examinations before the standing examination committee with the National Chamber of Crafts.

22 Information provided by the Employment Agency on 29 October 2013.
23 http://umispublic.minfin.bg/srchProjectInfo.aspx?id=43286
Encouragement, motivation, support and training of refugee and humanitarian status holders in relation to job seeking

The staff of SAR’s IC have regularly worked for the delivery of this measure with respect to both refugees and asylum-seekers. They keep in touch with the job-seekers and provide support by helping them draw up their CVs, by brokering the contacts with potential employers and by informing them about job fairs. The Integration Centre maintains a board with job advertisements.

Upon registration beneficiaries are provided with oral information about their rights and obligations, the services rendered by the Employment Offices. While this information is in Bulgaria, there is an English version available on EA’s website.

Best practice: the Migrapass project 24 offers opportunities to improve the economic integration of migrants and refugees.

The development of a portfolio and the training conducted enable migrants and refugees to put into practice their experience, to assess their competences, and provide them with opportunities for an easier access to the labour market. The portfolio allows the identification and assessment of:
1) the professional experience accumulated in the country of origin (which is often ignored in the host country);
2) their informal training (for example, participation in voluntary activities);
3) specific competences linked to living abroad (metacompetences).

The portfolio developed contributes to supplementing the professional profiles of migrants and refugees with additional competences, which are crucial in view of the dynamic labour market where adaptability and mobility are key factors of success in career development.

Training of refugees to develop and implement small business projects

Those refugees who wish to start up their own business are referred to the EODs which organize training courses and provide counselling in this area. IC acts as an intermediary for refugees who have already started their own business by helping them find appropriate workers who have been through vocational trainings at SAR. Such refugees are also assisted in filling in the documents to be submitted to the EOD.

24 Migrapass is an international project under the Leonardo da Vinci Program with partners in five countries - Austria (Oikodrom), Bulgaria (CERMES), Spain (University of Burgos), the United Kingdom (Roehampton University), and France (Autremonde and IRIV Conseil). More information at: http://cermes.info/page.php?category=65


Zvezda Vankova, Multi Kulti Collective Association for BCRM – 2013
The Business Incubator for Vulnerable Groups Project of the Bulgarian Red Cross is an example of best practice for improving the economic integration by fostering entrepreneurship among migrants and refugees. The objective is improving the social status of vulnerable groups and socially disadvantaged people by enabling them to develop strategies for a self-sufficient life, which will facilitate their independent inclusion in the labour market. The project raises the awareness about vulnerable and marginalized communities among the public at large through the involvement of volunteer students and private businesses. 30 students from St. Kliment Ohridski University of Sofia have so far been trained in providing social orientation to various vulnerable groups with specific needs. They have been through a number of training seminars conducted by the project partners Baker Tilly Klitou, Microfund AD, St. Kliment Ohridski SU, the Centre for the Transfer of Innovative Practices, and the Bulgarian Red Cross, and have acquired skills to provide regular consultations to beneficiaries in the following areas: assistance in starting up one’s own business; assistance in finding financial support under the form of low-interest microcredits; assistance in applying for additional qualifications before the Employment Agency; consultations in drafting an application for a credit; business plans and other documents needed for starting up a business; individual mentorship at the stages of planning and implementation, monitoring, and support after the start-up.

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

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

Organization of training seminars with staff from the Employment Office Directorates in relation to their work with refugees

This activity has not been implemented due to the lack of funding. IC’s staff share that such trainings were organized in the past and proved to be extremely beneficial, as they provided EOD’s staff with information about the specific features of the target group. According to the EA’s staff interviewed, their colleagues from the EODs are interested in such training. Hence, they propose developing a project under Human Resources Development OP with SAR as a beneficiary.

Development and implementation of targeted programs to support the access of refugees to the labour market through the development of processional


Zvezda Vankova, Multi Kulti Collective Association for BCRM – 2013
skills in a real working environment as part of the measures set out in the National Employment Plan

The Ministry of Labour and Social Policy has developed a program for the qualification and employment of aliens who received refugee or humanitarian status in 2013 and 2014 and are registered with EODs. The program will be implemented across the country and will provide:

- Bulgarian language training: 180 hours for 500 persons;
- Vocational training for acquiring the 1st degree of professional qualification or partial qualification in the profession needed to meet the eligibility requirements for the relevant jobs: 300 hours for 100 unemployed persons;
- Follow-up subsidiary employment for 200 persons for a 6-month period.

Establishment and maintenance of a database on the education and professional qualifications of refugees to be used when planning measures for the enhancement of their professional qualifications, vocational training and job seeking

An expert at SAR’s IC collects data and maintains a database on the education and professional qualifications of refugee job-seekers. The database contains all the documents of such job-seekers. An expert at SAR's IC regularly receives information about vacancies on the labour market and brokers the placement on the relevant jobs for people with appropriate qualifications.

Organization of specialized job fairs with the participation of potential employers to facilitate refugees’ access to employment

In relation to the Agreement for cooperation and joint activities concluded between EA and SAR, in 2013 the Employment Agency facilitated the organization of the job fair for refugees within the programming period. Upon the request of the Forum Association, which is the contractor for Action B2 of the 2011 ERF Annual Program “Facilitation of refugees’ access to employment and small business opportunities by means of trainings in key employment skills (the spirit of initiative and leadership skills), training in the development and implementation of small business projects, organization of specialized job fairs with the participation of potential employers, etc.”, EA ensured the attendance of 10 employers. According to the NGO representatives interviewed, the job fair was not attended by refugee and humanitarian status holders, but only by asylum-seekers who had been in the procedure for less than 1 year and were not entitled to employment. In view of the increased refugee inflow, EA’s staff propose that 2 job fairs be held per year with employers from various sectors and with key employers who offer job opportunities across the whole country.

26 http://www.arefa.gov.bg/?cat=13&newsid=651
The Employment Agency submits its monthly schedules for job fairs to SAR, which is in conformity with the Agreement concluded. An expert from the Integration Centre informs the job-seekers among the refugees and asylum-seekers about the day, the time and the type of the job fair. As of the time of the interview 10 refugees were actively seeking a job and relied on IC’s support as an intermediary.

SECTION V: EDUCATION

This section includes 5 measures, 4 of which are ongoing and 1 has expired. The objective is to improve the access of refugees to the public education system.

Conducting a survey to identify the difficulties refugees have in their integration at school and to develop measures for overcoming these difficulties

The measure has not been delivered as it is not considered a priority one.

Organizing annual training seminars with teachers working with refugee children

Within the framework of the programming period such a seminar was conducted only in 2011 and was assessed as extremely beneficial by all the stakeholders.

In 2013 UNHCR initiated, in partnership with the MES, a 2-day seminar for teachers who work with refugee children; the discussion had a focus on best practices in working with this target group.

Supporting the educational integration of minor refugees by motivating and advising their parents, encouraging and supporting contacts between parents and teachers, activities for creating social and cultural relationships between refugee and Bulgarian children

According to the bi-annual report of SAR’s IC the following activities have been carried out:

- Walking sight-seeking tours of Sofia were conducted in the first half of 2013. This was a joint initiative of SAR’s IC and Free Sofia Tour and Multi
Kulti Collective Associations; Arab-speaking, French-speaking and English-speaking guides were used;

- Some activities aimed at improving the microclimate in schools were organized in implementation of the activities related to the cultural adaptation and social orientation of refugee children. Tolerance classes were held at Philip Stanislavov School No 66 under a joint project with volunteers from CVS-Bulgaria which included role games and parents’ involvement, as recommended in the 2012 Monitoring Report;

- Several events “Bread Making and Intercultural Interaction”, etc. were jointly organized with the Bread Houses Network.

The experts from SAR’s IC identify the lack of a link between the school and the parents as the major issue in this area. As a result of the seminars conducted with teachers and headmasters, IC has established direct contacts with the school headmasters. The teachers are open to joint actions and cooperation with SAR. While SAR’s IC provides support to the parents accommodated at the Sofia RRC, those who live in rented lodgings remain without support.

According to MES’s staff interviewed, in addition to the joint activities with NGOs, the headmasters were sent letters, via the heads of the RIEs, whereby the schools were recommended to implement a variety of activities aimed at fostering positive attitudes to refugees’ issues, and to promote any students’ initiatives along this line. The book “The Road of Refugees” published by the United Nations Society to support both teachers and students was disseminated.

**Development and validation of standardized tests to determine the grade, stage and level of education of children who have received protection in Bulgaria and who cannot present documents to certify the education completed in their country of origin**

As of the time of the survey, Caritas-Bulgaria was implementing the project “ACCESS – a program for ensuring access to the national education system for asylum-seekers and refugees”[27], financed from ERF. The first expert meeting under the Project has already been held. According to RIE’s staff, the standardized text should be in one single package with the program which is to be applied before the students do the test. It has been proposed that during the parents’ status determination procedure the children should attend a 250-hour Bulgarian language training course (3 hours/day) within 3 months. Furthermore, it has been proposed that training in specific terminology relevant to various subject matters should also be ensured. This training ends with a test. RIE’s experts define this program as an adaptation one which, therefore, cannot be implemented within MES’s curricula and plans. Its purpose is to prepare students to adapt to the upcoming education. Methodologies for the enrolment of these

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children will be designed, and proposals for the needed legislative changes will be drafted.

RIE’s experts propose speeding up the procedure for children’s enrolment in schools. This can be achieved through improved inter-agency coordination. The first action would be identifying the relevant children and setting up small groups for Bulgarian language training. Transportation for the children could be provided from SAR’s centres to the nearest schools where the initial Bulgarian language training is planned to be conducted by a teacher qualified to teach Bulgarian as a foreign language.

**Promoting infinitives and activities to familiarize school and university students with the rights, culture, traditions and life of refugees**

According to the reports of SAR’s IC, numerous events, as described above in this section, have been held in implementation of this measure.

MES’s staff interviewed point out that such activities have been carried out in schools in all the areas – reading and discussing the book “The Road of Refugees”, organizing charity campaigns, thematic exhibitions, discussions on tolerance of diversity and difference, on compassions for refugees’ problems.

**SECTION VI: SOCIAL ASSISTANCE**

This section of the NPIRRB includes 3 ongoing measures. The objective is to improve the access of refugees to social assistance and services.

In view of the increased refugee inflow, the Social Assistance Agency (SAA) has issued additional instructions to the Social Assistance Directorates regarding the rights of refugee and humanitarian status holders.

**Inclusion of social intermediaries in the activities for social assistance to refugees**

This measure has not been delivered. It overlaps with Measure 4, Section 1.

**Development and dissemination of information materials on the rights and obligations of refugees in the area of social assistance**

In 2012 information materials about refugees’ rights and obligations in the area of social assistance were developed at the initiative of the Association for the
Integration of Refugees and Migrants (AIMR) and with the financial support of the UN High Commissioner for Refugees.

SAA approached SAR for support in relation to ensuring the translation of information materials about SAA's responsibilities in the provision of social assistance to refugee and humanitarian status holders into the Arabic and other languages, and the dissemination of this information to SAR's territorial units in order for refugees to be acquainted with their rights and obligations.

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

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

**SECTION VII: HEALTHCARE**

This section includes 5 ongoing measures. The objective is to improve the access to healthcare for refugees. None of the measures has been delivered. The first three ones are not considered priority measures by SAR's IC:
- Inclusion of refugees in health strategies for disadvantaged minorities;
- Inclusion of refugees in national programs for health prophylaxis and prevention;
- Inclusion of refugees in screening campaigns for the prevention of oncological diseases.

Measure 4 “Involvement of intermediaries for the purpose of facilitating the access of refugees to healthcare services” overlaps with Measure 4, Section 1.

Measure 5 “Organization of training seminars with general practitioners and dentists on specific health issues and needs of refugees” is not backed up with financial support, even though it is relevant to the integration of refugee and humanitarian status holders.
According to the interviewed expert from the Ministry of Health, the ministry has approved in principle the involvement of refugee and humanitarian status holders in all the prevention and prophylaxis programs (HIV, AIDS, TB, Osteoporosis, oncological diseases). The access of the beneficiaries of international protection to these programs is not hindered in any way, as these strategies cover everybody, irrespective of their health insurance.

According to data from the Ministry of Health, representatives of the Regional Health Inspectorates have held talks with medical doctors in an attempt to reduce the number of cases where pediatricians refuse to consult and examine refugee children. The expert interviewed points out that pediatricians refuse to provide health care to refugee children due to the linguistic barrier and the impossibility to communicate with their children, as this circumstance contributes to the risk of a medical error.

According to NGO representatives, there are issues with the medical doctors even in cases where the parents are accompanied by social mediators.

SECTION VIII: REFUGEES WITH SPECIAL NEEDS

This section of the NPIRRB includes 4 measures, 3 of which are ongoing. One of the measures is time limited for 2012-2013. The objective is to facilitate the access of refugees with special needs to rights and services.

Periodic training of social workers from the respective departments of the Social Assistance Agency working with refugees with special needs

This measure has not been delivered due to the lack of budget funding.

Involvement of refugees with special needs in different forms of psychological and social work, medical care, social patronage services, cultural activities and other services

IC’s experts have provided support to persons with special needs in cooperation with NGOs: ACET, the Council of Refugee Women in Bulgaria, the Bulgarian Red Cross, Cultural Association 25.

Provision of information, consultations and mediation to refugees with special needs with regard to their rights and obligations, provision of legal assistance and support
The IC experts provide consultations and advice to refugee and humanitarian status holders with special needs on any issues concerning education, social assistance, professional qualifications, health insurance, issuing of documents. These measures do not substantially differ from the ones available for the other newly recognized refugee and humanitarian status holders. No mediation has been ensured for these individuals. For more information, see Section 1.

**Ensuring access to alternative forms of Bulgarian language education and vocational training adapted to the individual needs and capabilities of refugees with special needs**

This measure has not been delivered.

**SECTION IX: PROTECTION AGAINST DISCRIMINATION**

This section includes 5 ongoing measures. The objective is to ensure the right of refugees to equality before the law, equal treatment and opportunities for participation in public life and efficient protection against discrimination

The majority of the respondents say that they have not been victims of discrimination. Moreover, they assess Bulgarians as being “tolerant, noble people”. As it was also pointed out in the 2012 Monitoring Report, this is not, however, the case with women who wear the hidjab. These women complain about bad attitude from Bulgarians. One of the women interviewed shares that controllers on the public transport always choose her to be the first passenger to control and she has trouble with them; however, it usually happens that some Bulgarian interfere in an attempt to defend her.

The findings from the interviews with refugee and humanitarian status holders show that discriminatory attitudes to them in relation to renting accommodation have worsened compared to the year 2012. Most of them mention hearing statements, such as: “We don’t rent flats to Arabs.” Families with many children also experience difficulties in this respect.

The interviews show that SAR does not cooperate with the Commission for the Protection against discrimination (CPD) which is the appropriate partner for such measures. While CPD was approached with the request for an interview with a member of their staff, as of late November, when the report activities had been completed, the Commission had not responded to the request.
Organization of training seminars, drafting and dissemination of information materials for refugees aimed at ensuring protection in case of discrimination

This measure has not been delivered.

Working and partnership with the media to establish a favourable environment among the Bulgarian society in support of refugees’ integration and non-discrimination

This measure is implemented on an ad hoc basis. There is not a PR strategy in place with a view to raising the awareness of the Bulgarian public on refugee issues and non-discrimination. Hence, the mass media have contributed to an unfavourable environment for the integration of refugee and humanitarian status holders, which has resulted in emerging attitudes of xenophobia, racism and fascism within the Bulgarian society.

Ongoing update of SAR’s specialized web site and of the section dedicated to refugees’ integration in order to provide information on all integration measures and possibilities in the Republic of Bulgaria

The measure has not been delivered. The latest news dates back to 2010. There is a lack of topical information on the reasons why refugees flee a certain country, what problems they face, and the ways of integration in Bulgaria.

Cooperation with the National Ombudsman Institution in relation to the protection of refugees’ rights

There is no active interaction with the National Ombudsman who is committed to aliens’ issues in Bulgaria and can act as a partner in any campaigns aimed at better protection of refugees’ rights in Bulgaria.

Promoting the development and introduction of training modules and programs to familiarize school and university students with the rights, culture, traditions and life of refugees

Various activities have been implemented in cooperation with NGOs. For more information, see Section 5.

6. Management of the NPIRRB

Funding
The annual financial estimates for the 2013 NPIRRB also amount to 300,000 BGN. While numerous changes have occurred over the years, this sum has not been adjusted. For example:

- Number of refugees involved in the NPIRRB (in 2008 – 100 refugees and 50 refugee children, since 2009 – 60 refugees and 30 refugee children);
- The measures for newly recognized refuge and humanitarian status holders (e.g. the financial support for housing was provided for 1 year till 2011);
- The economic environment in the country, etc.

While SAR's IC has published an annual report on its activity since last year, this report does not contain data about the expenditures under the Program. In addition to being contrary to the rules of good governance, this practice constitutes a violation of SAR's internal rules – Art. 2, para 6 of the Regulation on the Implementation of the Social Protection Measures for Asylum-seekers or Status holders with Special Needs, and Articles 2 and 4 of the Internal Regulation on the Application of the Measures for the Integration of Newly Recognized Refugees laid down in the National Program for the Integration of Refugees in the Republic of Bulgaria (2011-2013). The financial information from SAR shows that the Program funds were spent on the activities in section I. Out of a total of BGN 300,000 – according to the 2013 estimates – as of early November the amount absorbed was BGN 87,180.99. While the financial estimates for 2013 include financial resources for a lecturer under module “Social Orientation and Cultural Adaptation”, Bulgarian language training based on individual programs, outsourced vocational training, study visits to cultural and historical sites, kindergarten fees, SAR's IC was not provided with funds for these measures, which made their implementation impossible. The one-off social aid in the fourth month after the involvement in the NPIRRB was been paid; neither was the one-off target aid for families with children enrolled in the first grade in a state or municipal school. The NPIRRB does not have its own budget, which prompts the conclusion that more than ⅔ of the funds planned have not been absorbed for the purpose of refugees’ integration in the Republic of Bulgaria.

**Best practice:** As regards financial accountability, SAR may consider the best practice of the Ministry of Interior which publishes on its website\(^{28}\) information about the budget planned and its execution. As of November 2013 the following are available on the MOI website:

- Report on the revenues on MOI’s budget as of 30 Sept. 2013;
- Report on the expenditures on MOI’s budget in relation to policies and programs as of 30 Sept. 2013;
- Report on the institutional and administrative expenditures in relation to programs as of 30 Sept. 2013;
- Breakdown of the institutional and administrative expenditures in relation to programs for 2013;

\(^{28}\) [https://www.mvr.bg/Guide/finotch.htm](https://www.mvr.bg/Guide/finotch.htm)
Implementation

The following conclusions can be drawn on the basis of the information gathered and analysed regarding the implementation of the Program in 2013:

- **Lack of inter-institutional coordination.** Most of the experts interviewed emphasize that in view of the increasing migration pressure, SAR should step up its efforts in ensuring the coordination of the stakeholder institutions and the regular provision of information about the number of applicants who have received protection, unaccompanied minors, the integration of refugee and humanitarian status holders and their whereabouts. The involvement of other governmental institutions in the Program is often limited to drafting the Program for the next programming period. There is no interagency working group which can hold regular sessions and jointly manage the operations for the execution of the Program. There is no regular coordination with the NGOs and municipal authorities involved in the implementation of the Program, either. This has been identified as a major issue for a second consecutive year by the experts interviewed;

- **Limited human resources.** It would be unrealistic to expect from a department of 5 persons to be able to carry out all the measures planned in the NPIRRB and to efficiently provide consultations and support for refugees’ integration. IC needs social mediators who can alleviate the workload of the experts and take over the tasks of filling in forms, accompanying refugees to EODs, etc.;

- **Cumbersome bureaucratic process.** Enrolment in the Program takes about 2 months during which refugees do not have another source of subsistence. The process of examining an application is unreasonably bureaucratized and needs to be optimized. The only positive development in this respect in 2013 is the 7-day time limit – introduced in the new internal rules – within which SAR’s Chairperson signs the contract for enrolment in the Program. This measure, however, does not shorten the initial 2-month period which precedes the involvement of refugee and humanitarian status holders in the Program;

- **Lack of electronic flow of documents.** The documents for each refugee are collected by various experts several times and are kept as hard copies. Being fragmented, the information thus gathered is not conducive to properly monitoring either the participant’s file or the implementation of his/her individual plan. The internal rules amended in 2013 provide for some additional register which shall be kept as hard copies.

Regular reporting on performance and analysis
SAR’s IC operates on the basis of annual and quarterly plans and reports on the performance by means of annual, bi-annual and quarterly reports. Except for the annual report, the other reports on the activity of SAR’s IC are not public and are not subject to civil oversight by the NGOs with which SAR has cooperation. There are no in-depth analyses of the efficiency of the measures applied, of the satisfaction of the target groups and the issues they face in their integration. Such analyses are needed for flexible measures to be planned.

Lobbying in support of the priority measures

In 2011 the National Strategy on Migration, Asylum and Integration (2011-2020) was adopted; the Strategy includes asylum-seekers, refugee and humanitarian status holders among its target groups. SAR is one of the institutions represented in the National Council for Migration Policy which is in charge of the implementation of the strategy. Many of the measures laid down in the NPIRRB require inter-institutional coordination and lobbying. The interviews conducted, however, show that the meetings of the Secretariat of the National Council were underused by SAR’s IC for the purpose of lobbying in support of the measures aimed at refugees’ integration.

7. Conclusions

On the basis of the interviews and analyses on the implementation of the integration measures, it can be concluded that the goal “each and every refugee, in the course of up to one year after being granted refugee status, should have access to financial support for housing, social assistance, health insurance, Bulgarian language training, social orientation and cultural adaptation, vocational training, translation/interpretation services, and facilitating the exercise of basic rights and opportunities” has not been fully delivered. The reasons for that are the lack of sufficient financial resources, some legislative barriers, and the insufficient human resources at SAR’s IC.

In spite of the upward trend in the refugee inflow in 2013, the activities for providing support to newly recognized refugees were still carried out on the territory of the city of Sofia, instead of covering the whole country as foreseen in the NPIRRB. In reality support was still provided over a period of 6 months after receiving the status, which was assessed as insufficient by the beneficiaries. The amount of the financial support being insufficient, the majority of the newly recognized refugees preferred having a job instead of relying on support under the NPIRRB. There was no course for social orientation and cultural adaptation, even though attending such a course is defined as one of the eligibility conditions for the access to financial support, and the financial estimates of the Program include funds for the remuneration of a lecturer and study visits. No specialized measures with respect to vulnerable persons were applied. While the financial estimates of the NPIRRB envisage a higher amount of the stipend received by the
participants, the opportunity to update the stipend was missed for a second consecutive year; and thus it has not been increased by 4 BGN.

As some of the measures in the NPIRRB are no longer topical and the Program lacks flexibility, the management of SAR’s IC chose not to take any actions for these measures (See Table 1 in the Annexes). The Program implementation is not backed up with financial and resource provision, which inevitably resulted in challenges in the delivery of important and topical measures for refugees’ integration. A major deficiency of the NPIRRB identified is the failure to deliver on the financial estimates for the Program, which are updated and approved by the Council of Ministers on an annual basis.

8. The perspective of the next programming period

On 25-26 April the Bulgarian Council on Refugees and Migrants (BCRM) organized a Roundtable on the Development of the 2014-2016 NPIRRB. The experts from the stakeholder institutions and NGOs reached the conclusion about the need for a new concept to be applied for the structure and content of the NPIRRB, which would allow its flexible implementation, clearly defined responsibilities of the relevant institutions and organizations, and the efficient use of the funds allocated. BCRM and the member organizations drafted proposals concerning the concept and structure of the 2014-2016 NPIRRB, the measure for the integration of newly recognized refugee and humanitarian status holders with a special focus on individuals from vulnerable groups and minors.

The new integration program (2014–2016) should have national dimensions and must be applied by all the municipalities on their respective territories. The program should contain flexible modules for Bulgarian language training, cultural adaptation and financial assistance, so that these modules could be applied wherever they are needed without any bureaucracy and delays.

The new program should have its own budget and each individual beneficiary should receive the funds due on the territory where they reside; the program should include a basic package of integration measures to be ensured by providers across the country; furthermore, the package should be based on forecasts about the expected number of refugees, the economic conditions, and the real integration needs of refugees.

Social medication for refugee and humanitarian status holders should become an integral part of the implementation of the Program; this will require allocating some budget funds for that purpose in order to ensure sustainability in time. The social mediators (from the refugee communities and/or undergraduate students from programs in Arab studies) could commit to all the activities related to counselling, social orientation, facilitating refugees' interaction with the
institutions, assisting the parents of refugee children with school arrangements; while IC’s experts could focus their efforts on intra-institutional coordination and legislative changes with a view to facilitating the integration of the target group in the Bulgarian society. The involvement of social mediators from the refugee communities will enable them to actively participate in taking decisions about refugees’ integration needs.

The Roundtable on the Development of the 2014-2016 NPIRRB organized by BCRM proposed a new structure of the Program:

**Introduction**

**Part I. Analysis of the situation and the implementation of the 2011-2013 NPIRRB**

**Part II. Main principles**

**Part III. Target groups**

**Part IV. Priority areas:**
- Priority area 1 – Integration of newly recognized refugee and humanitarian status holders;
- Priority area 2 – Integration of newly recognized refugee and humanitarian status holders from vulnerable groups;
- Priority area 3 – Integration of newly recognized unaccompanied minor refugee and humanitarian status holders;
- Priority area 4 – Integration of refugee and humanitarian status holders in the social, economic, cultural and civil life of the Bulgarian society.

**Part V. Financing**

**Part VI. Implementation mechanism – institutions and organizations, management and coordination, reporting and monitoring of implementation**

**Annexes**
- 1. Indicators for the implementation of the NPIRRB
- 2. Financial estimates by priority areas and consolidated budget for the period 2014-2016

**Recommendations in terms of the integration measures:**

- Prevent any delays in the payment of the financial support for housing, especially long delays, such as the one by 3 and more months registered in mid 2013;
- Ensure earlier payment of the one-off social aid, as the highest expenditures are incurred upon enrolling in the Program – the deposit rent, furnishing the rooms, etc.
- Update the amount of the stipend for the trainees in the courses for Bulgarian language, social orientation and cultural adaptation and vocational training in a timely manner in conformity with the changes in the Action Plan to the Employment Promotion Act;
• Prolong the duration of the Bulgarian language and the social orientation courses to 1 year, and, respectively, the entitlement to receive stipend and rental support to 1 year;
• Put in place more specialized measures with a practical focus for vulnerable refugees;
• Involve unaccompanied minor refugees as a target group in the Program; design a special package of measures for them;
• Develop an action plan for the protection and integration of unaccompanied minors, which will describe all the steps to be taken with respect to these children and will be jointly implemented by the stakeholder institutions;
• Put in place a database for unaccompanied children which will provide the initial information to the stakeholder institutions and NGOs and will allow expedient responses;
• Appoint social workers at the Sofia RRC and the centres in Voenna rampa, Vrajdebna and the village of Kovatchevtsi in order to take over some of the tasks of IC’s experts that are not inherent to their professional obligations;
• Appoint Bulgarian language teachers at the Banya RCC and the centres in Voenna rampa, Vrajdebna and the village of Kovatchevtsi in order to enable refugee children to sit for the language examination with the Regional Inspectorate of Education;
• The RIE should demand from teachers to hold regular meeting with the parents of refugee children in order to encourage them to have their children included in the mainstream education;
• Make better use of existing free-of-charge practices or volunteer practices which do not require any financial resources – e.g. the training centre at the Sofia Municipal Library, which is equipped with 10 PCs under the Global Libraries Project and an expert trainer: this centre can be used for computer skills training; the business incubator of the BRC, the Foodstuff bank, Free Sofia Tour, etc.
• Cooperate more actively with the institution of the National Ombudsman, which can be instrumental in raising awareness among the public about refugees’ issues;
• Train teachers to work in a multi-cultural environment;
• Develop a communication strategy for SAR and actively work with the mass media in order to overcome the lack of information about refugees’ issues within the Bulgarian society;
• Plan for regular seminars on anti-discrimination issues with the staff of the stakeholder institutions, medical doctors, dental doctors and teachers;
• Train specialized staff of municipalities who will gradually take over the task of implementing the integration packages and measures under the methodological guidance of SAR’s IC.

**Recommendations in terms of the management of the Program:**
Use as a model the National Employment Action Plan approved by a Decision of the Council of Ministers in developing the new NPIRRB; this plan consists of an analysis of the situation, a report on the implementation of the plan during the previous year, priority areas, employments programs and measures, financing, and other matters;

Ensure that the financial estimates are an integral part of the new 2014-2016 NPIRRB and that they are endorsed by the Council of Ministers;

Publish bi-annual and annual reports on the implementation of the NPIRRB with a descriptive and a financial component on SAR's website;

Make financial provisions for the participation of NGOs and municipalities in the Program;

Set up an inter-agency working group with representatives of the stakeholders institutions, NGOs and municipalities; the working group will hold regular sessions and contribute to the implementation of the NPIRRB;

Use the assistance from social mediators in working with refugee and humanitarian status holders;

Optimize the process of inclusion in the Program;

Introduce performance and evaluation indicators.

9. Annexes

Table 1 Evaluation of the measures included in the NPIRRB

<table>
<thead>
<tr>
<th>Measure</th>
<th>Brief description</th>
<th>Evaluation 2012</th>
<th>Evaluation 2013</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>SECTION I. MEASURES FOR THE INTEGRATION OF NEWLY RECOGNIZED REFUGEE AND HUMANITARIANS STATUS HOLDERS</td>
<td></td>
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<tr>
<td>Measure 1</td>
<td>Implementation of a package of measures for the integration of newly recognized refugee and humanitarian status holders</td>
<td>Implementation in progress, but insufficient</td>
<td>Implementation in progress, but insufficient</td>
<td>Financial support in the course of 6 months, insufficient financial aid, delayed payment/no payment of the financial aid, which is assessed as deterioration compared to 2012, not all the courses planned are delivered</td>
</tr>
<tr>
<td>Measure 2</td>
<td>Implementation of a package of measures for the integration of newly recognized refugee and humanitarian status holders</td>
<td>Implementation in progress,</td>
<td>Implementation in progress,</td>
<td>Does not substantially differ</td>
</tr>
<tr>
<td>Measure 1</td>
<td>Analysis of the domestic legislation and proposals for amendments to the now effective legislation</td>
<td>Actions taken to ensure delivery within the time limit</td>
<td>Delivered</td>
<td>Proposals for amending the provisions of LAR related to refugees’ integration developed as of early November 2013. The amendments proposed, however, have not been taken into consideration by SAR’s management.</td>
</tr>
<tr>
<td>Measure 2</td>
<td>Developing and initiating legislative changes aimed at ensuring a legal guardian for unaccompanied minor refugees</td>
<td>Deadline expired, but implementation still in progress</td>
<td>Deadline expired, but implementation still in progress</td>
<td></td>
</tr>
<tr>
<td>Measure 3</td>
<td>Developing and applying measures for raising the awareness and</td>
<td>Delivered</td>
<td>Delivered</td>
<td>Implemented by AIRB at their initiative, with financial support</td>
</tr>
</tbody>
</table>

**SECTION II: LEGISLATIVE MEASURES**

**Measure 3**

| Implementation of measures for the integration of newly recognized refugee and humanitarian status holders from vulnerable groups | Implementatioin progress | Implementatioin progress | Except for unaccompanied minors |

<p>| Development and application of mediation programs in relation to the exercise of refugees’ basic rights and opportunities | Actions taken to ensure delivery within the time limit | Not delivered | Best practice proposed |</p>
<table>
<thead>
<tr>
<th>Measure</th>
<th>Description</th>
<th>Status</th>
<th>Status</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measure 4</td>
<td>Initiating legislative changes aimed at regulating the possibility for additional Bulgarian language training for children</td>
<td>Deadline expired, but implementation still in progress</td>
<td>Deadline expired, but implementation still in progress</td>
<td>Activities in progress under the project “ACCESS – a program for ensuring access to the national education system for asylum-seekers and refugees”</td>
</tr>
</tbody>
</table>

SECTION III. HOUSING

<table>
<thead>
<tr>
<th>Measure</th>
<th>Description</th>
<th>Status</th>
<th>Status</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measure 1</td>
<td>Provision of housing services to refugees</td>
<td>Implementation in progress</td>
<td>Implementation in progress</td>
<td>Mostly by compatriots, the Council of Refugee Women, BHC, and BRC</td>
</tr>
<tr>
<td>Measure 2</td>
<td>Studying European best practices in the area of housing</td>
<td>Actions taken to ensure delivery within the time limit</td>
<td>Actions taken to ensure delivery</td>
<td>At the initiative of BCRM</td>
</tr>
<tr>
<td>Measure 3</td>
<td>Inclusion of refugees as a vulnerable social group in the development of strategies and programs</td>
<td>Not delivered, not considered a priority</td>
<td>Not delivered, not considered a priority</td>
<td></td>
</tr>
<tr>
<td>Measure 4</td>
<td>Inclusion of housing for refugees as a priority in the ERF annual programs</td>
<td>Actions taken to ensure delivery within the time limit</td>
<td>Actions taken to ensure delivery</td>
<td>Indicative proposals developed by SAR’s IC, but either the applicants who submitted projects proved to be unprepared for the implementation of the projects submitted or no applications were filed.</td>
</tr>
<tr>
<td>Measure 5</td>
<td>Exploring the possibilities for cooperation and the development of joint projects</td>
<td>Actions taken to ensure delivery within the time limit</td>
<td>Actions taken to ensure delivery</td>
<td>Implementation in progress in cooperation with BRC, with financial support from</td>
</tr>
<tr>
<td>Measure</td>
<td>Description</td>
<td>Implementation in progress</td>
<td>Implementation in progress</td>
<td>UNHCR Best practice proposed</td>
</tr>
<tr>
<td>-----------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>----------------------------</td>
<td>----------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>Measure 1</td>
<td>Intermediation for facilitating inclusion in the labour market</td>
<td>Implementatio in progress</td>
<td>Implementatio in progress</td>
<td></td>
</tr>
<tr>
<td>Measure 2</td>
<td>Including refugees in the examinations for the verification of the level of professional qualification at the National Chamber of Crafts</td>
<td>Implementatio in progress</td>
<td>Implementatio in progress</td>
<td></td>
</tr>
<tr>
<td>Measure 3</td>
<td>Encouragement, motivation, support and training of refugees in relation to job seeking</td>
<td>Implementatio in progress</td>
<td>Implementatio in progress</td>
<td>Best practice proposed</td>
</tr>
<tr>
<td>Measure 4</td>
<td>Training of refugees to develop and implement small business projects</td>
<td>Implementatio in progress</td>
<td>Implementatio in progress</td>
<td>Best practice proposed</td>
</tr>
<tr>
<td>Measure 5</td>
<td>Organization of training seminars with staff from the Employment Office Directorates in relation to their work with refugees</td>
<td>Not delivered, relevant to refugees’ integration</td>
<td>Not delivered, relevant to refugees’ integration</td>
<td>Not delivered due to the lack of funds</td>
</tr>
<tr>
<td>Measure 6</td>
<td>Development and implementation of targeted programs to support the access of refugees to the labour market</td>
<td>Actions taken to ensure delivery within the time limit</td>
<td>Actions taken to ensure delivery</td>
<td>MLSP has developed a program for the training and employment of refugees in 2013 and 2014</td>
</tr>
<tr>
<td>Measure 7</td>
<td>Establishment and maintenance of a database on the education and professional qualifications of</td>
<td>Implementatio in progress</td>
<td>Implementatio in progress</td>
<td></td>
</tr>
<tr>
<td>Measure</td>
<td>Refugees</td>
<td>Implementation Status</td>
<td>Action Taken</td>
<td></td>
</tr>
<tr>
<td>---------</td>
<td>----------</td>
<td>-----------------------</td>
<td>--------------</td>
<td></td>
</tr>
<tr>
<td>Measure 8</td>
<td>Organization of specialized job fairs</td>
<td>Implementatio in progress</td>
<td>Implementatio in progress</td>
<td></td>
</tr>
<tr>
<td>Measure 1</td>
<td>Conducting a survey to identify the difficulties refugees have in their integration at school</td>
<td>Not delivered, not considered a priority</td>
<td>Not delivered, not considered a priority</td>
<td></td>
</tr>
<tr>
<td>Measure 2</td>
<td>Organizing annual training seminars with teachers working with refugee children</td>
<td>Not delivered, relevant to refugees' integration</td>
<td>Delivered</td>
<td></td>
</tr>
<tr>
<td>Measure 3</td>
<td>Supporting the educational integration of minor refugees</td>
<td>Implementatio n in progress</td>
<td>Implementatio n in progress</td>
<td></td>
</tr>
<tr>
<td>Measure 4</td>
<td>Development and validation of standardized tests to determine the grade, stage and level of education</td>
<td>Actions taken to ensure delivery within the time limit</td>
<td>Actions taken to ensure delivery</td>
<td></td>
</tr>
<tr>
<td>Measure 5</td>
<td>Promoting infinitives and activities to familiarize school and university students with the rights, culture, traditions and</td>
<td>Implementatio n in progress</td>
<td>Implementatio n in progress</td>
<td></td>
</tr>
</tbody>
</table>

According to the NGO representatives interviewed, the job fair was not attended by refugees, but only by asylum-seekers who had been in procedure for less than 1 year and were not entitled to employment. Deteriorated quality of the job fairs conducted compared to 2012.

SECTION V. EDUCATION

<table>
<thead>
<tr>
<th>Measure</th>
<th>Refugees</th>
<th>Implementation Status</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measure 1</td>
<td>Conducting a survey to identify the difficulties refugees have in their integration at school</td>
<td>Not delivered, not considered a priority</td>
<td>Not delivered, not considered a priority</td>
</tr>
<tr>
<td>Measure 2</td>
<td>Organizing annual training seminars with teachers working with refugee children</td>
<td>Not delivered, relevant to refugees' integration</td>
<td>Delivered</td>
</tr>
<tr>
<td>Measure 3</td>
<td>Supporting the educational integration of minor refugees</td>
<td>Implementatio n in progress</td>
<td>Implementatio n in progress</td>
</tr>
<tr>
<td>Measure 4</td>
<td>Development and validation of standardized tests to determine the grade, stage and level of education</td>
<td>Actions taken to ensure delivery within the time limit</td>
<td>Actions taken to ensure delivery</td>
</tr>
<tr>
<td>Measure 5</td>
<td>Promoting infinitives and activities to familiarize school and university students with the rights, culture, traditions and</td>
<td>Implementatio n in progress</td>
<td>Implementatio n in progress</td>
</tr>
</tbody>
</table>

At the initiative and with the financial support of UNHCR in partnership with MES

Mostly with the support of NGOs

Under the project “ACCESS – a program for ensuring access to the national education system for asylum-seekers and refugees”

Best practice proposed
### SECTION VI. SOCIAL ASSISTANCE

<table>
<thead>
<tr>
<th>Measure</th>
<th>Inclusion of social intermediaries in the activities for social assistance to refugees</th>
<th>Overlapping</th>
<th>Overlapping</th>
<th>Overlaps with Measure 4, Section 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measure 1</td>
<td>Inclusion of social intermediaries in the activities for social assistance to refugees</td>
<td>Overlapping</td>
<td>Overlapping</td>
<td>Overlaps with Measure 4, Section 1</td>
</tr>
<tr>
<td>Measure 2</td>
<td>Development and dissemination of information materials</td>
<td>Implemented in progress</td>
<td>Implemented in progress</td>
<td>Implemented by the AIRM at their initiative with financial support from UNHCR; due to the limited number of brochures, the activity will be terminated at the end of 2013</td>
</tr>
<tr>
<td>Measure 3</td>
<td>Organizing training seminars with social workers on the specific aspects of the social work with refugees</td>
<td>Actions taken to ensure delivery within the time limit</td>
<td>Delivered</td>
<td>Contract signed with FICE-Bulgaria under an ERF project</td>
</tr>
</tbody>
</table>

### SECTION VII. HEALTHCARE

<table>
<thead>
<tr>
<th>Measure</th>
<th>Inclusion of refugees in health strategies for disadvantaged minorities</th>
<th>Not delivered, not considered a priority</th>
<th>Not delivered, not considered a priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measure 1</td>
<td>Inclusion of refugees in health strategies for disadvantaged minorities</td>
<td>Not delivered, not considered a priority</td>
<td>Not delivered, not considered a priority</td>
</tr>
<tr>
<td>Measure 2</td>
<td>Inclusion of refugees in national programs for health prophylaxis and prevention</td>
<td>Not delivered, not considered a priority</td>
<td>Not delivered, not considered a priority</td>
</tr>
<tr>
<td>Measure 3</td>
<td>Inclusion of refugees in screening campaigns for the prevention of oncological diseases</td>
<td>Not delivered, not considered a priority</td>
<td>Not delivered, not considered a priority</td>
</tr>
<tr>
<td>Measure 4</td>
<td>Involvement of intermediaries in</td>
<td>Overlapping</td>
<td>Overlapping</td>
</tr>
<tr>
<td>Measure 5</td>
<td>Organization of training seminars with general practitioners and dentists on specific health issues and needs of refugees</td>
<td>Not delivered, relevant to refugees’ integration</td>
<td>Not delivered, relevant to refugees’ integration</td>
</tr>
<tr>
<td>----------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------</td>
<td>-------------------------------------------------</td>
</tr>
</tbody>
</table>

### SECTION VIII. REFUGEES WITH SPECIAL NEEDS

<table>
<thead>
<tr>
<th>Measure 1</th>
<th>Periodic training of social workers from the respective departments of the Social Assistance Agency working with refugees with special needs</th>
<th>Not delivered, relevant to refugees’ integration</th>
<th>Not delivered, relevant to refugees’ integration</th>
<th>Not delivered due to lack of funding</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Measure 2</th>
<th>Involvement of refugees with special needs in different forms of psychological and social work...</th>
<th>Implemented, but insufficiently</th>
<th>Implemented, but insufficiently</th>
<th></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Measure 3</th>
<th>Provision of information, consultations and mediation to refugees with special needs</th>
<th>Overlapping</th>
<th>Overlapping</th>
<th>Overlaps with Measure 2, Section 1</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Measure 4</th>
<th>Ensuring access to alternative forms of Bulgarian language education and vocational training</th>
<th>Actions taken to ensure delivery within the time limit</th>
<th>Not delivered</th>
<th></th>
</tr>
</thead>
</table>

### SECTION IX: PROTECTION AGAINST DISCRIMINATION

<table>
<thead>
<tr>
<th>Measure 1</th>
<th>Organization of training seminars, drafting and dissemination of information materials...</th>
<th>Not delivered, relevant to refugees’ integration</th>
<th>Not delivered, relevant to refugees’ integration</th>
<th>Not delivered due to lack of funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Measure</td>
<td>Working and partnership with the media</td>
<td>Implementatio in progress, but insufficiently</td>
<td>Implementatio in progress, but insufficiently</td>
<td>Work in progress on an ad hoc basis</td>
</tr>
<tr>
<td>---------</td>
<td>--------------------------------------</td>
<td>-----------------------------------------------</td>
<td>-----------------------------------------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>Measure 2</td>
<td>Ongoing update of the specialized web site of SAR</td>
<td>Not delivered, relevant to refugees’ integration</td>
<td>Not delivered, relevant to refugees’ integration</td>
<td></td>
</tr>
<tr>
<td>Measure 3</td>
<td>Cooperation with the National Ombudsman Institution</td>
<td>Not delivered, relevant to refugees’ integration</td>
<td>Not delivered, relevant to refugees’ integration</td>
<td></td>
</tr>
<tr>
<td>Measure 4</td>
<td>Promoting the development and introduction of training modules and programs to familiarize school and university students with the rights, culture, traditions and life of refugees</td>
<td>Overlapping</td>
<td>Overlapping</td>
<td>Overlaps to a large extent with Measure 5, Section 5</td>
</tr>
</tbody>
</table>

The measures are evaluated, as follows:

- **Delivered** (for a one-time activity) or **Implementation in progress** (a regular or repeated activity);
- **Implementation in progress, but insufficiently** – the measure is implemented, but does not achieve the goal, as planned;
- **Actions taken to ensure delivery (within the time limit)** – actions have been taken for the delivery of the measure, but no results have been achieved yet, in particular in terms of the activities planned or funded under ERF;
- **Deadline expired, but implementation in progress**;
- **Overlapping** – overlaps with another activity planned;
- **Not delivered, relevant to refugees’ integration** – most often due to financial constraints;
- **Not delivered, not considered a priority by the management of SAR’s IC**.

Table 2: Refugee and humanitarian status holders involved in the NPIRRB by months and countries of origin in 2013

Zvezda Vankova, Multi Kulti Collective Association for BCRM – 2013

<table>
<thead>
<tr>
<th>Months/Count ries of origin</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>Total by countries of origin:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sudan</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Egypt</td>
<td></td>
<td>3</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>5</td>
</tr>
<tr>
<td>Iraq</td>
<td>4</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>15</td>
</tr>
<tr>
<td>Iran</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Cote d’Ivoire</td>
<td></td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Syria</td>
<td>13</td>
<td>9</td>
<td>3</td>
<td>4</td>
<td>7</td>
<td>9</td>
<td>5</td>
<td>9</td>
<td>8</td>
<td></td>
<td>67</td>
</tr>
<tr>
<td>Lebanon</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>India</td>
<td></td>
<td>2</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td></td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Stateless</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3</td>
<td>4</td>
<td>7</td>
</tr>
<tr>
<td><strong>Total by months</strong></td>
<td>7</td>
<td>19</td>
<td>9</td>
<td>4</td>
<td>5</td>
<td>10</td>
<td>12</td>
<td>8</td>
<td>13</td>
<td>13</td>
<td>100</td>
</tr>
</tbody>
</table>

Source: Monthly reports of SAR’s IC, 2013

Table 3: Refugee and humanitarian status holders involved in the NPIRRRB by months, gender and status in 2013

<table>
<thead>
<tr>
<th>Month/Gender</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>Total by gender</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>5</td>
<td>12</td>
<td>5</td>
<td>2</td>
<td>4</td>
<td>6</td>
<td>8</td>
<td>5</td>
<td>10</td>
<td>9</td>
<td>66</td>
</tr>
<tr>
<td>Female</td>
<td>2</td>
<td>7</td>
<td>4</td>
<td>2</td>
<td>1</td>
<td>4</td>
<td>3</td>
<td>3</td>
<td>4</td>
<td></td>
<td>34</td>
</tr>
<tr>
<td><strong>Month/Status</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>Total by status</strong></td>
</tr>
<tr>
<td>Refugee status</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>2</td>
<td></td>
<td></td>
<td>8</td>
</tr>
<tr>
<td>Humanitarian status</td>
<td>7</td>
<td>17</td>
<td>9</td>
<td>4</td>
<td>5</td>
<td>10</td>
<td>11</td>
<td>6</td>
<td>12</td>
<td>11</td>
<td>92</td>
</tr>
<tr>
<td><strong>Total by months</strong></td>
<td>7</td>
<td>19</td>
<td>9</td>
<td>4</td>
<td>5</td>
<td>10</td>
<td>12</td>
<td>8</td>
<td>13</td>
<td>13</td>
<td>100</td>
</tr>
</tbody>
</table>

Source: Monthly reports of SAR’s IC, 2013

Table 4: Data about families and representatives of vulnerable groups involved in the NPIRRRB over the period January – October 2013

<table>
<thead>
<tr>
<th>2013</th>
<th>No of persons involved in the</th>
<th>No of familie s</th>
<th>Country of origin</th>
<th>No of children</th>
<th>Age of children</th>
<th>Aliens with special needs</th>
</tr>
</thead>
</table>


Zvezda Vankova, Multi Kulti Collective Association for BCRM – 2013
<table>
<thead>
<tr>
<th>Date</th>
<th>NPIRRB (2011–2013)</th>
<th>Country</th>
<th>Children</th>
<th>Mentally Retarded</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
<td>3</td>
<td>Iraq</td>
<td>2</td>
<td>15</td>
<td>-</td>
</tr>
<tr>
<td>February</td>
<td>8</td>
<td>Iraq</td>
<td>5</td>
<td>5</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Sudan</td>
<td>2</td>
<td>2 and 7</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Syria</td>
<td>1</td>
<td>5</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Stateless Syria</td>
<td>1</td>
<td>7</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Syria</td>
<td>3</td>
<td>3, 10, 14</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4</td>
<td>4, 9, 11, 12</td>
<td>-</td>
</tr>
<tr>
<td>February</td>
<td>8</td>
<td>Iraq</td>
<td>5</td>
<td>5</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Syria</td>
<td>2</td>
<td>7 and 15</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>7 and 12</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>11 and 12</td>
<td>-</td>
</tr>
<tr>
<td>March</td>
<td>5</td>
<td>Syria</td>
<td>2</td>
<td>7 and 15</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>7 and 12</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2</td>
<td>11 and 12</td>
<td>-</td>
</tr>
<tr>
<td>April</td>
<td>3</td>
<td>Syria</td>
<td>4</td>
<td>2 of age, 2</td>
<td>4 children – 2 of age, 2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>underage – 3 of</td>
<td>children mentally</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>them mentally</td>
<td>retarded</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>retarded</td>
<td>Looking for opportunities for in vitro insemination</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Without children</td>
<td>-</td>
</tr>
<tr>
<td>May</td>
<td>1</td>
<td>Cote</td>
<td>-</td>
<td>Sick woman</td>
<td>Sick woman - unmarried</td>
</tr>
<tr>
<td></td>
<td></td>
<td>d’Ivoire</td>
<td></td>
<td>-</td>
<td>Oncological disease</td>
</tr>
<tr>
<td>June</td>
<td>2</td>
<td>Syria</td>
<td>2</td>
<td>8 and 11</td>
<td>-</td>
</tr>
<tr>
<td>July</td>
<td>8</td>
<td>Syria</td>
<td>1</td>
<td>1</td>
<td>With a child aged up to 11</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4</td>
<td>4 children (1, 3,</td>
<td>Family with many children</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3</td>
<td>8, 11)</td>
<td>Family with many children</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3 children (6, 13, 16)</td>
<td>- also included in the NPIRRB</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3 of age (aged 20–22)</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>-</td>
</tr>
<tr>
<td>August</td>
<td>3</td>
<td>Syria</td>
<td>2</td>
<td>2 children aged 7 and 10</td>
<td>Amputated leg</td>
</tr>
<tr>
<td>September</td>
<td>6</td>
<td>Syria</td>
<td>3</td>
<td>3 children (1, 5, 7)</td>
<td>Family with many children</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Without children</td>
<td>Spontaneous abortion during the war</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2 children (7 and 9)</td>
<td>-</td>
</tr>
</tbody>
</table>
### Table 6: Refugee and humanitarian status holders dismissed over the period 01.01–30.10.2013

<table>
<thead>
<tr>
<th>Month</th>
<th>Men</th>
<th>Women</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>February</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>March</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>April</td>
<td>10</td>
<td>-</td>
</tr>
<tr>
<td>May</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>June</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>July</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>August</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>September</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>October</td>
<td>8</td>
<td>5</td>
</tr>
<tr>
<td>TOTAL: 52</td>
<td>31</td>
<td>21</td>
</tr>
</tbody>
</table>

Source: Data from SAR

Source: Monthly reports of SAR’s IC, 2013
### Table 6: Applications for protection filed by unaccompanied minors over the period 01.01.2013 - 30.09.2013

<table>
<thead>
<tr>
<th>State</th>
<th>Total from 0 to 17</th>
<th>Of them women</th>
<th>00-13</th>
<th>14-15</th>
<th>16-17</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>F</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL</td>
<td>127</td>
<td>12</td>
<td>8</td>
<td>1</td>
<td>27</td>
</tr>
<tr>
<td>Algeria</td>
<td>16</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Afghanistan</td>
<td>12</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>Stateless</td>
<td>6</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Guinea</td>
<td>1</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Egypt</td>
<td>1</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eritrea</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Iraq</td>
<td>7</td>
<td>1</td>
<td>1</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>Cameroon</td>
<td>2</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Congo</td>
<td>4</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Côte d'Ivoire</td>
<td>11</td>
<td>0</td>
<td></td>
<td>2</td>
<td>9</td>
</tr>
<tr>
<td>Mali</td>
<td>17</td>
<td>4</td>
<td>1</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Morocco</td>
<td>3</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nigeria</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pakistan</td>
<td>2</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ruanda</td>
<td>2</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sierra Leone</td>
<td>1</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Syrian Arab Republic</td>
<td>38</td>
<td>3</td>
<td>6</td>
<td>1</td>
<td>9</td>
</tr>
<tr>
<td>Somalia</td>
<td>2</td>
<td>0</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Source: Data from SAR*
Table 7: Number of refugee and humanitarian status holders who received financial support for housing under the NPIRRB over the period 01.01 – 30.08.2013

<table>
<thead>
<tr>
<th>Payment documentation for the payment of financial aid for housing under the NPIRRB in 2013</th>
<th>NPIRRB (2011-2013) – No humanitarian status holders (HS)</th>
<th>NPIRRB (2011-2013) – No refugee status holders (RS)</th>
<th>Men</th>
<th>Women</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
<td>6</td>
<td>1</td>
<td>3</td>
<td>4</td>
<td>7</td>
</tr>
<tr>
<td>February</td>
<td>5</td>
<td>1</td>
<td>2</td>
<td>4</td>
<td>6</td>
</tr>
<tr>
<td>March</td>
<td>8</td>
<td>-</td>
<td>3</td>
<td>5</td>
<td>8</td>
</tr>
<tr>
<td>April</td>
<td>18</td>
<td>1</td>
<td>7</td>
<td>12</td>
<td>19</td>
</tr>
<tr>
<td>May</td>
<td>15</td>
<td>1</td>
<td>5</td>
<td>11</td>
<td>16</td>
</tr>
<tr>
<td>June</td>
<td>16</td>
<td>1</td>
<td>6</td>
<td>11</td>
<td>17</td>
</tr>
<tr>
<td>July</td>
<td>15</td>
<td>-</td>
<td>9</td>
<td>6</td>
<td>15</td>
</tr>
<tr>
<td>August</td>
<td>15</td>
<td>2</td>
<td>11</td>
<td>6</td>
<td>17</td>
</tr>
<tr>
<td>Total</td>
<td>98</td>
<td>7</td>
<td>46</td>
<td>59</td>
<td>105</td>
</tr>
<tr>
<td>Average per month</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>13</td>
</tr>
</tbody>
</table>

Source: Payment documentation kept at SAR’s IC
Table 8: Number of persons attending Bulgarian language courses over the period January – September 2013

<table>
<thead>
<tr>
<th>Refugees trained in Bulgarian language courses / month</th>
<th>01</th>
<th>02</th>
<th>03</th>
<th>04</th>
<th>05</th>
<th>06</th>
<th>07</th>
<th>08</th>
<th>09</th>
<th>10</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 NPIRRB – refugee status</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>3</td>
<td>5</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>2 NPIRRB – humanitarian status</td>
<td>5</td>
<td>11</td>
<td>27</td>
<td>25</td>
<td>20</td>
<td>21</td>
<td>25</td>
<td>27</td>
<td>25</td>
<td>17</td>
</tr>
<tr>
<td>3 Humanitarian status – not included in the NPIRRB</td>
<td>8</td>
<td>8</td>
<td>6</td>
<td>1</td>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 Asylum-seekers</td>
<td>24</td>
<td>19</td>
<td>9</td>
<td>11</td>
<td>10</td>
<td>9</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 Refugee children</td>
<td>7</td>
<td>10</td>
<td>10</td>
<td>16</td>
<td>18</td>
<td>20</td>
<td>14</td>
<td>15</td>
<td>14</td>
<td>26</td>
</tr>
<tr>
<td>6 Unaccompanied minors</td>
<td>9</td>
<td>13</td>
<td>7</td>
<td>6</td>
<td>6</td>
<td>7</td>
<td>5</td>
<td>5</td>
<td>2</td>
<td>9</td>
</tr>
<tr>
<td>Average per month</td>
<td>55</td>
<td>54</td>
<td>62</td>
<td>61</td>
<td>61</td>
<td>57</td>
<td>59</td>
<td>50</td>
<td>50</td>
<td>46</td>
</tr>
</tbody>
</table>

Source: Data from SAR’s IC
Table 10 Number of persons attending vocational training courses over the period January – July 2013

<table>
<thead>
<tr>
<th>Vocational training courses</th>
<th>Jan.</th>
<th>Febr.</th>
<th>March</th>
<th>April</th>
<th>May</th>
<th>June</th>
<th>July</th>
<th>Average per month</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tailor</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>9</td>
<td>9</td>
<td>7</td>
<td>7</td>
<td>8</td>
</tr>
<tr>
<td>Cosmetician</td>
<td>10</td>
<td>10</td>
<td>10</td>
<td>7</td>
<td>7</td>
<td>6</td>
<td>6</td>
<td>8</td>
</tr>
<tr>
<td>Hairdresser</td>
<td>12</td>
<td>12</td>
<td>12</td>
<td>8</td>
<td>8</td>
<td>8</td>
<td>4</td>
<td>9</td>
</tr>
<tr>
<td>Total</td>
<td>32</td>
<td>32</td>
<td>32</td>
<td>24</td>
<td>24</td>
<td>21</td>
<td>17</td>
<td></td>
</tr>
</tbody>
</table>

Source: Data from SAR’IC. The vocational training courses were discontinued by an oral order issued from 1 August 2013 and were renewed on 16 October 2013.
10. Reference literature

Internal Regulation on the Application of the Measures for the Integration of Newly Recognized Refugees laid down in the National Program for the Integration of Refugees in the Republic of Bulgaria (2011-2013)

Budget of the National Health Insurance Fund Act

Employment Promotion Act

Family Benefits for Children Act

Social Assistance Act

Law on Asylum and Refugees


National Program for the Integration of Refugees in the Republic of Bulgaria 2011-2013

AIRM Report on the Implementation of the National Program for the Integration of Refugees in the Republic of Bulgaria over the period January - September 2012


Action Plan to the Employment Promotion Act

Regulation for the Implementation of the Social Assistance Act

Regulation on the Implementation of the Social Protection Measures for Asylum-seekers or Status holders with Special Needs