



NIEM
ALL IN FOR INTEGRATION

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Manifesto on Refugee Integration in Bulgaria





Multikulti
Collective



Manifesto on Refugee Integration in Bulgaria

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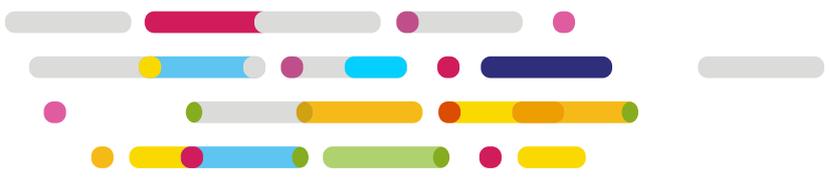
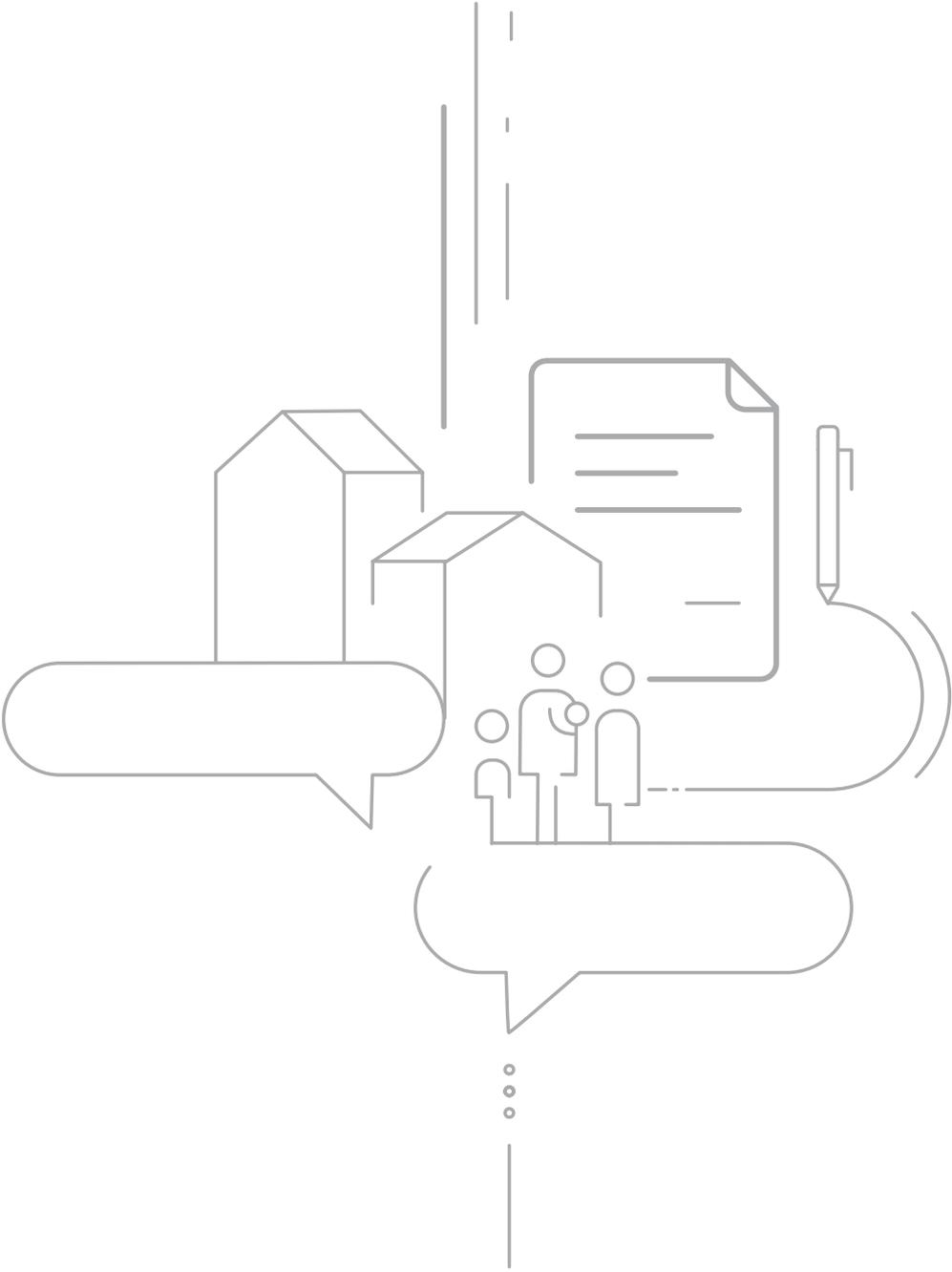
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Summary

This Manifesto on Refugee Integration in Bulgaria is a national programme document and an advocacy tool which covers all the main areas of refugees' integration in Bulgaria. It is based on the understanding that integration is an investment allowing newcomers to get involved in the country's economic, social and cultural life as soon as possible, and thus become self-sufficient and contribute to the benefit of the host society. Another important consideration is that the government and the local authorities play the leading role in the integration of beneficiaries of international protection, while the non-governmental sector has supporting and auxiliary functions.

The Manifesto proposes restoring the National Programme for Refugees' Integration which was operational in 2005–2013 when the Programme was implemented by State Agency for Refugees with funding from the state budget and was defined as a good European practice. Moreover, the Manifesto proposes that this Programme be upgraded with the now effective legal framework – the Ordinance on the terms and procedures to conclude, implement and terminate integration agreements with beneficiaries of asylum or international protection – which provides for the active participation of municipalities and focuses on integration at the local level. Applying the best aspects of the two approaches ensures that while being in the procedure or soon after receiving a status the persons will start the adaptation process, and only those of them who are motivated will have the opportunity to participate in the integration programme at the local level.

In view of the above, the following is proposed:

1) **Setting up a new institutional structure, which includes:**

-  The designation of a Deputy Prime Minister who is responsible for the overall planning and implementation of the integration policy for refugees in Bulgaria;
-  Broadening the scope of competences of the State Agency for Refugees by establishing an Adaptation and Integration Directorate with three departments – Adaptation and Initial Integration; National Integration Programme; and Information and Analysis;
-  The active involvement of municipalities/districts which are willing to host refugees for integration on their territory, and receive, for that purpose, targeted funding and support.

2) **Developing a comprehensive integration process at two stages:**

-  Adaptation and initial integration – the target group are persons who seek asylum or received international protection within the last one year. It comprises a training and a practical module: Bulgarian language training; civic orientation training; providing refugees with an overall idea about

their future and development opportunities in Bulgaria; involvement of minor and underage persons in education; access to the labour market for adults; building relations with the host community via contacts with institutions, volunteers, companies, etc.;



National Integration Programme – the target group are individuals who have been granted international protection and have been through the first stage. A one-year integration agreement is concluded between a refugee and a municipality/district; the agreement provides for the provision of flexible support such as housing, civil registration and issuing of IDs, Bulgarian language training, education, healthcare, employment, social assistance and social services, monthly integration allowance, information provision and empowerment.

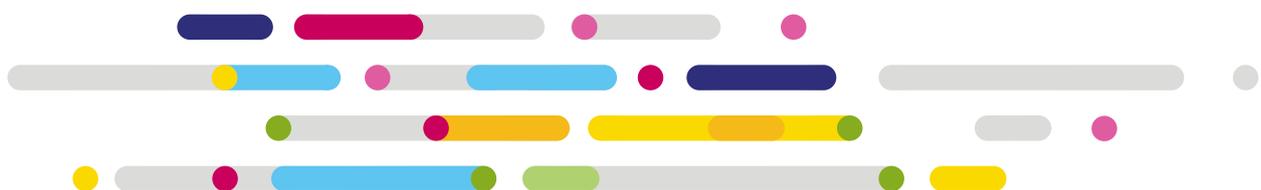
In view of the above, the responsible Deputy Prime Minister has to ensure **sustainable funding** from the state budget, EU funds or other sources.

The development of this Manifesto is the first-ever initiative in Bulgaria. It was carried out in November 2021 – June 2022 in the context of:

- The completion of the 6-year work on the NIEM project during the period 2016–2022, which included research and advocacy activities aimed at improving refugees' integration in Bulgaria;
- The start of the EU Action Plan on Integration and Inclusion 2021–2027;
- The start of the new 2021–2027 EU Programming Period;
- The start of the Recovery Plan for Europe;
- The overall re-thinking of life and policies in the aftermath of the COVID-19 pandemic.

This initiative Manifesto on Refugee Integration in Bulgaria was conducted by Multi Kulti Collective, Bulgarian Council on Refugees and Migrants in partnership with UNHCR Bulgaria, in cooperation with a number of stakeholders, including experts from institutions, international organizations, the non-governmental sector, the academia, businesses, representatives of the refugee communities in Bulgaria, etc. They participated in the document development through a series of national roundtables, expert meetings and online consultations.

The Manifesto on Refugee Integration in Bulgaria was drafted as part of the National Integration Evaluation Mechanism (NIEM) project co-financed from the Asylum, Migration and Integration Fund of the European Union.



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Abbreviations

- BIP** – beneficiary of international protection
- CCSD** – Council for Civil Society Development
- CoM** – Council of Ministers
- CV** – Curriculum Vitae
- CVT** – Centre for Vocational Training
- EA** – Employment Agency
- EO** – Employment Office with the Employment Agency
- EU** – European Union
- GP** – general practitioner
- MES** – Ministry of Education and Science
- MH** – Ministry of Health
- NAMRB** – National Association of Municipalities in the Republic of Bulgaria
- NCID** – National Centre for Information and Documentation
- NGO** – non-governmental organization
- NIEM** – National Integration Evaluation Mechanism Project
- NRA** – National Revenue Agency
- RHI** – Regional Health Inspectorate
- RIE** – Regional Inspectorate of Education
- RRC** – Registration and Reception Centre with State Agency for Refugees
- SAR** – State Agency for Refugees
- SHTAF** – Special Home for Temporary Accommodation of Foreigners
- UCN** – unique citizenship number
- UNHCR** – United Nations High Commissioner for Refugees



1. Introduction

Refugees in Bulgaria have both motivation and capacity to participate in the economic and public life, and contribute to the country's development¹. **Refugees have the talents, ideas and energy** needed to contribute to their new society by ensuring peace and certainty for themselves and their families. Given its profile of a nation with ageing and shrinking population, with an increasingly tangible demand for workforce, Bulgaria needs them (United Nations, 2019). However, in order to benefit from their potential, the country should extend a helpful hand in the long, complicated and multi-tier process of integration. Learning the language, finding accommodation, employment, a family doctor, education, etc. could be too many tasks to accomplish on one's own for a person who is in a new country, communicates in a new language, and often has scarce financial resources and incomplete information. Good European practices have shown that the countries which ensure an **effective right to integration** by providing newly arrived refugees with stable support tailored to their needs will, sooner and to a greater extent, benefit from the contribution made by these people to the society in the form of financial and human capital.

In 2005–2013, **Bulgaria was also part of these good European practices** in the region of Central and Eastern Europe by means of its National Programme for Refugees' Integration in the Republic of Bulgaria funded from the state budget and implemented by the State Agency for Refugees (SAR) (Vankova, 2013). With the onset of the Syrian crisis and the increased refugee influx in 2014, however, instead of being expanded and upgraded, the Programme was suspended, which resulted in the first **"year of zero integration"** (Vankova, 2014). Later, in 2016 and 2017, the Programme was replaced with a new policy for integration at the local level which **never became fully operational in practice**, as it lacked both a competent authority and funding (Ivanova, 2021)²³. This is why, a number of European surveys rank Bulgaria amongst **the least developed EU states in terms of the integration support offered to refugees**. The 2021 Comparative Report on the National Integration Evaluation Mechanism project (NIEM), which covers 14 EU Member States, ranks Bulgaria amongst the top 3 countries with the weakest integration policy, right above Poland and Hungary – countries which were notorious with their anti-refugee attitudes as of 2021 (Wolffhardt et al, 2022). This result in terms of Bulgaria's evaluation is due to the **systematic failure to address the issue and the lack of political will** (Ivanova, 2021).

¹ In this publication, „refugees“ shall mean persons who have been granted humanitarian protection and refugee status.

² Ordinance on the terms and procedures to conclude, implement and terminate integration agreements with beneficiaries of asylum or international protection adopted by Resolution No 208/12 August 2016.

³ Ordinance on the terms and procedures to conclude, implement and terminate integration agreements with beneficiaries of asylum or international protection adopted by Resolution No 144 of 19 July 2017.

Due to the war in Ukraine and the refugee crisis in 2022, the important topic about refugees' integration was back on the public and political agenda. The newcomers need support in order to become self-sufficient and thus ensure their subsistence without being "a burden" on the budgets of the EU and the Member States. The state should apply a comprehensive value-based approach which provides long-term stable solutions and is focused on achieving practical results. Bulgaria should design and develop a **constructive, efficient and reasonable system for refugees' integration** which allows in practice the full inclusion of refugees in the economic, social and cultural life of the country. The main principles at the basis of this system should be the rule of law, democracy, respect for human rights, avoiding any forms of discrimination and inequality, efficiency, transparency, participation of all stakeholders, including the refugees themselves and the host community. The system should ensure peaceful coexistence for all the residents in Bulgaria by **preventing xenophobia, racism and hate speech, as well as social exclusion and radicalization**.

This Manifesto has been jointly drafted by non-governmental and international organizations which have been active in the area of refugees' integration for decades and are well familiar with their needs, challenges and capacity. Furthermore, the refugees themselves were involved in developing the document at the outset of the process. The Manifesto aims **to consolidate collective wisdom** and provide policy-makers with the **most efficient solutions** based on Bulgaria's experience and the best contemporary European practices. It aims to contribute to developing a just and tolerant society which cares for human beings, for their dignity and well-being, by also enabling them to accomplish their full potential of personal and public development.





2. Institutional Structure

2.1. Summary

- The National Strategy for the Integration of Asylum-seekers or Beneficiaries of International Protection is endorsed by a **Deputy Prime Minister**, in cooperation with a **Working Group on Refugees' Integration** with the Council for Civil Society Development (CCSD).
- SAR is the competent authority for the implementation of the National Strategy, in particular its Adaptation and Integration Directorate which will be established for that purpose.
- **Two stages of integration** are introduced: one for the period of the procedure for international protection, and one for the period after receiving international protection.
- **The first stage *Adaptation and Initial Integration*** has a training module and a practical one. The training module "Start Bulgaria" includes a mandatory Bulgarian language course (A1 level), and a mandatory civic orientation course. These modules aim to provide knowledge about the host society, build initial relations with Bulgarians, and facilitate prospects and objectives for the future for each participant (building an integration profile for the individual). The practical module requires that individuals aged up to 18 enrol in school, while adults, who wish so, register with the Employment Offices (EOs).
- **The second stage of the *National Programme for Refugees' Integration*** (the Programme) includes concluding an integration agreement between each refugee and the municipality/district mayor, and drawing up an individual integration plan. The process is coordinated by SAR. It is the individuals who have been through the first stage of the mandatory training module that are eligible for the second stage.
- SAR organizes monthly meetings with the **National Committee on Refugees' Integration with SAR's Chairperson** consisting of representatives of international organizations, the non-governmental sector, and other experts. These meetings endorse SAR's proposals for referring individuals to the relevant municipalities/districts which have declared their wish to participate in the Programme.
- **The integration agreement** is concluded for a one-year period, with a possible extension for another year under specific conditions. The activities under the agreement can include support for housing, civil registration and issuing identity documents, Bulgarian language training, education, employment, healthcare, social assistance and services, monthly integration allowance, information provision and empowerment.



- The municipalities/districts and SAR conclude a contract on **targeted funding** which is provided from the state budget, EU funds and other sources. SAR is committed to monitoring the spending of the funds and the implementation of the activities.

2.2. A Deputy Prime Minister oversees the national policy for the integration of beneficiaries of international protection (BIPs) in Bulgaria⁴. With the support of the administration of the Council of Ministers (CoM), the Deputy Prime Minister:

- Endorses the National Strategy for the Integration of Asylum-seekers or Beneficiaries of International Protection, and annual plans for the implementation thereof based on proposals by SAR's Chairperson⁵;
- Endorses the annual reports of SAR's Chairperson on the implementation of the National Integration Programme;
- Organizes national roundtables on issues related to the integration of BIPs;
- Chairs the working group on refugees' integration, with representatives of CCSD;
- Manages the allocation of funds for integration activities (by means of decisions on the provision of funds from the state budget, EU funds or other sources).

2.3. The State Agency for Refugees with the Council of Ministers (SAR), in its capacity of a specialized state authority for the implementation of the national policies in the area of international protection, carries out the policy for the integration of asylum-seekers and BIPs.

SAR:

- Is the coordination and enforcement authority for the adaptation and initial integration activities during the procedure for international protection conducted on the premises of its Registration and Reception Centres (RRCs);
- Based on the above, it facilitates the identification of individuals to be involved in activities for long-term integration, and ensures continuity between initial integration and the long-term one within the framework of the National Programme for Refugees' Integration;
- Coordinates, finances and monitors the Programme activities.

To this end, the competences of one of SAR's Deputy Chairpersons will be broadened to include an Integration portfolio. This will be the Deputy Chairperson who is currently in charge of the Social Activities and Adaptation Directorate. A new Adaptation and Integration Directorate will be established, while the now existing directorate will be renamed as "Social Activities".

The Adaptation and Integration Directorate comprises three departments (*see chart 1*):

⁴ While as of June 2022 this obligation in respect of beneficiaries of international protection was laid down in Art. 19 of the Ordinance on the terms and procedures to conclude, implement and terminate integration agreements with beneficiaries of asylum or international protection, it was not applied in practice.

⁵ As of June 2022, this activity was performed by the National Council on Migration, Borders, Asylum and Integration.



- **Adaptation and Initial Integration** which manages the integration activities at SAR's RRCs;
- **National Integration Programme** which coordinates the interaction with the local authorities and the application of the Ordinance on the terms and procedures to conclude, implement and terminate integration agreements with beneficiaries of asylum or international protection, and monitors integration activities at the local level;
- **Information and Analysis** which gathers and analyses quantity and quality data regarding the state of refugees' integration by sectors, drafts proposals for strategic documents and action plans, identifies structural challenges in terms of refugees' access to rights, and submits proposals for addressing these challenges.



Chart 1
Organization chart: System for integration at SAR



The duties of each department are, as follows:

Adaptation and Initial Integration Department:

- Draws up an *Initial Adaptation Plan* for each adult asylum-seeker which includes:
 - Bulgarian language course;
 - Civic orientation course;
 - Enrolment of children (if any) in school;
 - Referral to employment through EOs (if the person wishes);
 - Organizing vocational training courses (if possible).
- Organizes civic orientation and Bulgarian language courses or contracts them out to an NGO, company or another appropriate organization;
- Assists with the enrolment of children in school;
- Assists with referrals to employment through EOs;
- Organizes vocational training courses or contracts them out to an NGO, company or another appropriate organization;
- Coordinates information sessions conducted at SAR's centres by other institutions such as the Employment Agency (EA), the Ministry of Education and Science (MES), the Regional Health Inspectorates (RHI), etc.);
- Draws up *integration profiles* for the individuals concerned based on their participation in the Initial Adaptation Plan with a view to involving them in the National Programme for Refugees' Integration after they are granted a status.

National Integration Programme Department:

- Develops criteria for inclusion in the Programme (related to the outcomes from the Initial Adaptation Plan and the applicant's integration profile);
- Receives applications from BIPs who wish to be included in the Programme;
- Promotes the Programme among municipalities/districts;
- Organizes activities aimed at enhancing the capacity of municipalities/districts – trainings, information sessions, ongoing support via a Q&A telephone line, etc.;
- Maintains a database with the municipalities/districts wishing to conclude integration agreements;
- Makes motivated proposals for concluding an integration agreement between specific individuals and specific municipalities/districts (on the basis of preferences indicated by the individuals and the municipalities/districts);
- Coordinates the activity of the National Committee for Refugees' Integration with SAR's Chairperson which consists of SAR representatives (including the Adaptation and Initial Integration Department), NGOs and municipalities/districts, and which approves the decisions on concluding and terminating agreements;
- Manages the budget for integration agreements;
- Concludes with municipalities/districts a contract for the funding of integration agreements with a specific scope and activities;



- Monitors the implementation of integration agreements in financial, administrative and quality terms, and develops criteria for evaluating the outcomes from their implementation;
- Drafts an annual report on the results from the National Programme for Refugees' Integration which is submitted to SAR's Chairperson and the responsible Deputy Prime Minister.

Information and Analysis Department:

- Requests and gathers data related to all integration sectors (education, employment, social assistance and services, healthcare, etc.) from responsible institutions, NGOs and other stakeholders for the purpose of analysis;
- Requests and gathers data about integration-related projects and programmes (incl. with funding from the EU or other sources) implemented by the municipalities/districts which carry out integration activities;
- Analyses the effective legal framework, policies and practices in the context of enhancing the efficiency of integration activities, and submits proposals for changes to SAR's Chairperson and the responsible Deputy Prime Minister;
- Drafts proposals to SAR's Chairperson and the responsible Deputy Prime Minister in relation to the National Strategy for the Integration of Asylum-seekers or Beneficiaries of International Protection, and the annual action plans.

2.4. The municipalities/districts ensure the *integration activities for BIPs* at the local level. They:

- Sign integration agreements with BIPs;
- Sign a contract for funding the integration agreement with SAR;
- Provide integration support to the relevant individuals in conformity with the integration agreement;
- Report on the outcomes from the implementation of the agreement to SAR's National Integration Programme Department;
- Are entitled to training and support from SAR;
- Are entitled to participation in national roundtables on issues related to the integration of BIPs which are organized by the responsible Deputy Prime Minister;
- Carry out awareness-raising activities among the host community with the aim to ensure better reception of BIPs at the local level and prevent xenophobia, racism and hate speech.

2.5. Justification

The implementation of a targeted national policy for the integration of BIPs which has specific measurable objectives requires, first and foremost, the designation of **a managing and coordinating authority**.



Since 2014 the lack of such an institution has resulted in the absence of:

- Strategic documents in the area of integration and appropriate national action plans⁶;
- An adequate and clear mechanism for integration;
- A mechanism for the provision of financial resources for the integration activities, in spite of the substantial amount of EU funding, in particular via the Asylum, Migration and Integration Fund, but also via the European Social Fund, Erasmus+, etc.;
- Institutional and practical support for the municipalities/districts that will apply the integration policies in practice;
- Practical tools and expertise among government and local officials for working with refugees;
- Developed partnerships with a broad range of stakeholders in the spirit of the UN Global Compact on Refugees and the EU Action Plan on Integration and Inclusion (2021–2027) (United Nations, 2018; Communication from the Commission, 2020).

As integration is a complex process involving the participation of various institutions and stakeholders, the strategic guidance should be ensured at the highest political level: by the **Council of Ministers**. The proposal for a responsible **Deputy Prime Minister** whose task will be to monitor the state integration policy, with the support of CoM's administration, is based on the now effective legislation⁷.

While this legal requirement laid down in the Ordinance is yet to be implemented with respect to BIPs, it has had its practical application in the context of the 2022 crisis with the Ukrainian refugee who have temporary protection. The Deputy Prime Minister for efficient governance managed the response by all relevant institutions, and this allowed holding timely discussions on a variety of issues within the competences of the individual ministries, initiating legislative changes in an expeditious manner, putting in place new mechanisms, and committing institutional resources.

Taking into consideration this experience, it is proposed that the responsible Deputy Prime Minister should determine the strategic guidelines for the sector based on SAR's proposals. This function has so far been performed by the National Council on Migration, Asylum and Integration which, however, being under the authority of the Minister of Interior, does not take actions in the area of integration.

In addition to and also based on the experience with the 2022 Ukrainian crisis, it is proposed that the existing CCSD subgroup with the responsible Deputy Prime Minister, which unites the non-governmental organizations providing support to refugees, should continue operating. The direct dialogue with the organizations on the grass-root level allows identifying not only challenges faced by refugees, but also workable solutions.

⁶ The absence of such an institution in late 2013 resulted in developing a strategy (2014–2020) which was highly inconsistent with the spirit of the Ordinance on an Integration Agreement adopted later, and in the total lack of a programme document after 2021, and only the brief mentioning of the topic in the more general National Migration Strategy (2021–2025)

⁷ Art. 19, Ordinance on the terms and procedures to conclude, implement and terminate integration agreements with beneficiaries of asylum or international protection.



It is logical for the leading role in the coordination and implementation of integration policies to be entrusted to the specialized state authority ensuring the implementation of the national policies in the area of international protection: **SAR**. The arguments behind this proposal can be summed up in two groups:

1) Operational suitability and expertise

- SAR manages the activities in its territorial units; it does not have an alternative as the institution in charge of the adaptation and initial integration activities (during the procedure for international protection). The Agency manages such activities also at present (e.g., Bulgarian language courses);
- SAR's experts have the best of knowledge in Bulgaria about the specifics of the target group: language, cultural characteristics, attitudes, needs, resources, etc.;
- SAR's experts are familiar with the structural and institutional challenges in working with the target group;
- SAR has developed partnerships with the non-governmental sector which is actively involved in providing services in the Agency's territorial units;
- SAR has interpreters and social experts in the field who know the personal stories of the individuals accommodated at the RRCs;
- SAR has accumulated experience with drafting integration profiles of those who wish to get integrated in Bulgaria;
- SAR has created and maintains a database with the municipalities/districts that have declared their wish to conclude integration agreements;
- SAR has created and maintains a database with employers who wish to hire refugees.

2) Experience during the period 2005–2013

In 2005–2013, SAR was the competent authority for the implementation of the National Programme for Refugees' Integration in the Republic of Bulgaria. Within the framework of this Programme, 100 BIPs per year – 60 adults and 40 children – were entitled to a package of measures for a 1-year period: accommodation, Bulgarian language training, inclusion on the labour market and vocational training, enrolment of children in kindergartens and school, social and cultural adaptation, health insurance, one-time targeted assistance, etc. Over the years of its existence, the Programme set an example as one of the best integration practices in Central and Eastern Europe (Vankova, 2013).

This programme was discontinued after the number of applications for international protection surged in 2014. The reason indicated was that integration requires the



participation of more stakeholders, and that good European practices point to the need for the local authorities to play the leading role in the process.

Indeed, making municipalities an active participant in the process – as provided for in the Ordinance on an Integration Agreement – is an important step in the spirit of good practices in Europe⁸. At the same time, however, the European experience prompts the need to have an institution in charge of the development and observance of a common strategy, vision and control over the funding, the objectives and the content of integration support⁹.

The municipalities/districts have long ago been identified as a key stakeholder in the process of refugees' integration. The mayors are the ones who know best the characteristics of the local community: the needs and possibilities offered by the local structures. The municipalities are closest to the local community and integration takes place at the local level.

The municipalities:

- Are defined as the main stakeholder in the Ordinance on an Integration Agreement¹⁰;
- Are the competent authority in the process of civil registration and generating a unique citizenship number (UCN);
- Manage the policies in the areas of housing, education, social services, etc. at the local level;
- Are familiar with the economic trends, workforce needs and the workforce profiles in demand;
- Have direct contact with the local community.

Over recent years several municipalities/districts have built capacity for carrying out refugees' integration activities in partnership with NGOs in conformity with the now effective legal framework, and have regularly shared their experience at various national and regional fora.

⁸ Ordinance on the terms and procedures to conclude, implement and terminate integration agreements with beneficiaries of asylum or international protection

⁹ For example, MOI in Cyprus, Greece, the Czech Republic, France, etc.; the ministries of labor/social affairs in the Netherlands, Latvia, Poland, Estonia, etc.; or ministries established for the purpose of integration in Denmark, Luxemburg, etc. See p. 52 at: <https://www.osce.org/files/f/documents/a/2/393554.pdf>

¹⁰ Art. 3(1), Ordinance on the terms and procedures to conclude, implement and terminate integration agreements with beneficiaries of asylum or international protection



3. Adaptation and Initial Integration of Refugee

3.1. Summary

An individual Initial Adaptation Plan is drawn up for all adults registered as applicants for international protection with SAR; this plan is an integral part of their personal file. The Initial Adaptation Plan of applicants who are parents includes also practical activities for the adaptation of their minor and underage children. The body in charge of drawing up the plan and the implementation thereof is SAR's Adaptation and Initial Integration Department, whether the individual concerned lives in one of SAR's RRCs or at an out-of-centre address. It is based on the input from a brief initial interview with the newly registered foreigner, which aims to identify skills, talents, objectives and attitudes.

The Initial Adaptation Plan consists of two basic elements:

- A training module "Start Bulgaria" which comprises two mandatory courses: Bulgarian Language and Civic Orientation;
- A practical module: mandatory enrolment of persons aged up to 18 in school, and assistance with employment for persons aged over 18.

The trainees receive certificates for the successful completion of the training module "Start Bulgaria" (Bulgarian Language and Civic Orientation). These two certificates are key preconditions for their involvement in the National Integration Programme after receiving a refugee or humanitarian status.

The refusal to participate in the training module "Start Bulgaria" or to enrol their children in school rules out the possibility for asylum-seekers to benefit from the Programme. Exemptions for health reasons or other good reasons certified with the relevant documents are possible.

It is important to emphasize that it is not only applicants who are in the procedure that are eligible for adaptation and initial integration measures but also those who received international protection in Bulgaria less than a year ago. This option is offered by way an exemption to individuals who have changed their mind and wish to get integrated in Bulgaria and to participate in the National Programme for Refugees' Integration (see Chapter 4). In these cases, such persons benefit from the adaptation and initial integration measures on an equal footing with the other asylum-seekers, but are not entitled to accommodation in an RRC. Nevertheless, they have access to RRC premises and a transport card in order to be able to attend classes.

3.2. Training module "Start Bulgaria"

3.2.1. Bulgarian language

All the applicants attend a mandatory Bulgarian language training course organized on the premises of SAR (including for those who live at out-of-centre addresses). The courses are



either conducted by trainers hired by SAR or are contracted out to a specialized company or NGO. The financing of these courses can be ensured from the state budget, an EU fund or another source.

The mandatory Bulgarian language course covers the A1 level requirements set out in the Common European Framework of Reference for Languages and is in compliance with the Programme for teaching the Bulgarian language as a foreign language to adult asylum-seekers or beneficiaries of international protection¹¹. It has a duration of 120 academic hours within 3 months. Each trainee receives a textbook ensured by the training organization. Appropriate forms of language training are designed for illiterate persons. The conditions for course completion are 80 % attendance and the test passed. Completion is proved by a certificate, which allows enrolment in subsequent training or access to the National Programme for Refugees' Integration.

Bulgarian language courses are planned on a regular basis, and asylum-seekers have to be involved in training within one month from lodging their application. Where organizing the course is not possible at each of SAR's centres, the applicants will be included in a training at another location and will be provided with a free transport card, which will allow them to travel to the venue.

3.2.2. Civic orientation

All the applicants attend a civic orientation course which has two goals:

- Providing comprehensive knowledge about Bulgaria's state structure and the host society;
- Providing information about the possibilities for personal and professional development in Bulgaria.

The topics in the curriculum can be based on the training module for cultural and civic orientation of asylum-seekers and BIPs that has been specifically developed and piloted (Mancheva, 2019). The structure proposed comprises four main topics:

- **General Cultural Orientation** (population; national and religious holidays; social norms; healthcare and prevention; understanding the structures of the country and of the relevant city; transport; living at an out-of-centre-address; daily life and leisure time);
- **Civic Education** (state structure and form of government; political context in Bulgaria; fundamental civil rights and obligations);
- **Gender Equality** (short history of the movement for gender equality; current data on gender (in)equality on a global and national scale in domains such as public life, career development, and family);
- **Labour Market Orientation** (basic information on the structure of the labour market in Bulgaria; guidance on CV and motivation letter; job interview; employment and fundamental labour rights).

¹¹ Accessible at the website of the Ministry of Education and Science: <https://mon.bg/bg/100681>



The course could also include information sessions organized by Bulgarian institutions (MES, EA, Ministry of Health, etc.), NGOs, companies, etc. An important aspect of the training course is developing relations with the surrounding world, which can be achieved by means of sightseeing around the city and getting acquainted with the key institutions, cultural monuments, etc., involvement of volunteers, etc.

The civic orientation course is planned and delivered by SAR or is contracted out to an organization with appropriate experience such as an NGO, a company, etc. The duration and the curriculum are agreed upon with the contractor, making sure that the basic topics are covered. The financing of the courses can be ensured from the state budget, an EU fund or another source.

The conditions for course completion are 80 % attendance and positive evaluation by the training organization. It is proved by means of a certificate, which could be linked to eligibility for inclusion in the National Programme for Refugees' Integration. In addition, it could be linked to applying for Bulgarian citizenship at a later stage.

Civic orientation courses are planned on a regular basis, and asylum-seekers have to be involved in training within one month from lodging their application. Where organizing the course is not possible at each of SAR's centres, the applicants can be included in a training at another location, and will be provided with a free transport card, which will allow them to travel to the venue.

3.3. Practical component

3.3.1. Education

The legal requirement for ensuring that children are enrolled in school within 3 months from the lodging of the application for international protection is observed¹².

The Adaptation and Initial Integration Department maintains a database with data about the students seeking international protection, including school, grade, class, and contact data of the form master.

After an application for enrolment is lodged at the Regional Inspectorate of Education (RIE), SAR will:

- Ensure that children are referred to a specific school within the legal time limit;
- Ensure that an interpreter and a social worker attend the interview conducted by the school committee with the child;
- Make arrangements, in cooperation with MES, for transportation to the school (where necessary);
- Monitor the provision of textbooks and educational materials;
- Assist parents with lodging an application for additional Bulgarian language training for their children at school;

¹² Art. 26(3), Law on Asylum and Refugees – <https://lex.bg/laws/ldoc/2135453184>

- 
- Refer children for support to NGOs (where necessary);
 - Monitor or, where possible, ensure the provision of devices for online training (where necessary);
 - Stay in touch with the schools, and address any emerging needs or issues;
 - Assist parents in their communication with the teachers and the school management by providing interpreters and social workers;
 - Send letters to the schools informing them about children leaving SAR's RRCs.

SAR maintains equipped rooms in each of its territorial units for the purpose of educational activities with children. The Agency facilitates the provision of additional educational support by NGOs.

3.3.2. Employment

SAR issues a certificate stating the right of access to employment for each individual acquiring this right after the third month from lodging the application for international protection¹³. Furthermore, SAR registers at the local employment office all the applicants who have stated their wish to have employment.

SAR provides information about job vacancies for asylum-seekers and refugees via an information board in each RRC and/or via an online platform. The information is updated on the basis of weekly data provided by the relevant EO or information received directly by SAR.

SAR and EA organize regular job fairs on the premises of RRCs.

SAR publishes on its website up-to-date information about the legal provisions and the procedure for employing asylum-seekers and refugees, and the documents required with a view to assisting companies who wish to hire persons from the target group. The Adaptation and Initial Integration Department maintains a database with the companies registered. The Department, with the support of EA, the United Nations High Commissioner for Refugees (UNHCR) and NGOs, builds long-term partnerships with businesses with the aim to facilitate employment and internships for asylum-seekers.

In addition, SAR can equip workshops for vocational training and organize such training on SAR's premises in cooperation with EA, vocational training centres (VTCs) or socially responsible companies.

3.4. Justification

Integration is a two-way process requiring that conditions are ensured by the host country and efforts are made by the newcomers. All the programmes and plans should be based on the understanding that resources and efforts have to be invested by both parties involved. This is the rationale behind the Initial Adaptation Plan: the government offers opportunities, while the asylum-seeker works hard to benefit from these opportunities.

¹³ Art. 29(3), Law on Asylum and Refugees - <https://lex.bg/laws/ldoc/2135453184>



The need to have such a practice while asylum-seekers are still in SAR's centres is determined by the EU standard according to which integration measures should start at the earliest possible stage. Thus, individuals have enough time to find their way around in the environment and build initial relations therewith before leaving the RRC. The fact that most asylum-seekers are accommodated at the same place also facilitates the arrangements for integration measures. At the same time, it should be highlighted that SAR has also responsibilities with respect to those who live at out-of-centre addresses and are still in the procedure.

After the training module "Start Bulgaria", SAR should ensure prospects for follow-up steps to be taken by refugees in view of their potential life in Bulgaria – a clear idea about opportunities and the results from the actions taken. The persons concerned should be motivated to participate in the training module "Start Bulgaria" by means of both the useful knowledge they will acquire and the unequivocal message that support for BIPs will be available only to those who have made targeted efforts to deserve such support.

The training module "Start Bulgaria" (in particular, the civic education course) should create an image of our country as a worthy EU Member State which offers opportunities for personal and professional development. This initial stage of the integration process should focus on the first steps in acquiring knowledge about the state and the society, and should also allow asylum-seekers to become aware of the opportunities they have in our country. What requires this change of paradigm is the fact that a substantial part of newcomers have negative information about the upcoming stay in the country, which is often confirmed as a result of unpleasant and sometimes traumatic experiences when crossing the border and during the almost inevitable detention at the Special Homes for Temporary Accommodation of Foreigners (SHTAF).

Making integration measures a part of the procedure for international protection is the only objective criterion that can help identify the asylum-seekers' long-term intentions, and, respectively, their subsequent involvement in the National Programme for Refugees' Integration after receiving a status. The absence of any measures during the procedure hinders the identification of persons who are motivated and wish to settle and work in Bulgaria. A fair mechanism for access to the Programme cannot be developed if such a preparatory phase is not in place, which may be conducive to limited outcomes from the Programme and abuse.



4. National Programme for Refugees' Integration

4.1. Summary

The National Programme for Refugees' Integration is targeted at BIPs who wish to permanently settle in Bulgaria. By means of a number of activities tailored to the specific needs of refugees and their families, including special needs, vulnerability, etc., it assists the participants with their life in Bulgaria. It is only those who have successfully completed the adaptation and initial integration stage, in particular the training module "Start Bulgaria", that are eligible for participation. The reason is that they already have basic knowledge of the Bulgarian language, as well as basic information about the country and the life ahead of them.

All the individuals who received international protection in Bulgaria within the last one year are eligible for the Programme. This allows them not to take part in the adaptation and initial integration measures (see Chapter 3) during the procedure, and get involved in them after receiving a status. This option is offered by way of an exemption to those who have changed their mind and wish to get integrated in Bulgaria. In these cases, such persons have the right to participate on an equal footing with the other asylum-seekers, but are not entitled to accommodation in an RRC. Nevertheless, they have access to RRC premises and a transport card in order to be able to attend classes.

After they have received a status and have successfully completed the training module "Start Bulgaria", the persons concerned lodge an application for participation in the Programme. SAR provides support by developing their integration profile which includes information about the country of origin, age, family status, education background, intentions and preferences stated in terms of settling in specific municipalities/districts in Bulgaria. Then, SAR draws up a motivated opinion whereby it either approves or refuses involvement in the Programme. The National Committee for Refugees' Integration with SAR's Chairperson is the independent body which takes the final decision on the applicant's involvement in the Programme.

The next step is the signing of an integration agreement between the host municipality/district and the person, including (if any) his/her family. This agreement includes an integration plan with various activities in conformity with the person's needs. These measures could comprise housing, assistance with civil registration and issuing of IDs, healthcare, education, Bulgarian language training, support for employment, social assistance and social services, information provision and empowerment. Performance indicators are developed and attached to the integration plan. The municipality/district receives funding whereby it ensures the implementation of these measures and activities. The municipalities/districts have the discretion to either provide the relevant support on their own or delegate all or part of the activities to NGOs or companies that have the necessary expertise and experience.



The Programme is coordinated, monitored and financed by SAR, with national, EU or other funding. A report on the implementation of the Programme is submitted to the responsible Deputy Prime Minister.

4.2. Lodging an application and eligibility criteria

Any person who received international protection in Bulgaria within the last one year and who has successfully completed the module “Start Bulgaria” is entitled to apply for involvement in the National Programme for Refugees’ Integration. The applications are addressed to SAR’s Chairperson, and the competent body for examining them is the National Integration Programme Department. In cases of families, the application is lodged on behalf of one adult, and the other members are listed therein. The applications are examined within a one-month time limit, which, by way of exception, can be extended to three months. Those who have applied for involvement in the Programme within 14 days from receiving a status are entitled to stay on the premises of SAR’s RRC till they receive the response to their application.

The Adaptation and Initial Integration Department assists with the filing of applications for involvement in the Programme by means of a sample form. The department draws up an integration profile for each member of the family (if any) on the basis of an interview. The integration profile contains information about:

- Nationality, date of birth, family status;
- Education background (indication of available/unavailable education certificates);
- Work experience and expertise (sector, position, tasks, skills and competences acquired, tenure, etc.);
- Intentions declared (wish to stay in Bulgaria; wish to have education and professional development; relatives in other EU Member States, etc.);
- Preferences to settle in specific municipalities/districts in Bulgaria, and reasons for that (if any).

The attachment to the application for involvement in the Programme includes the following:

- Certificate of completion of a Bulgarian language course (within the training module “Start Bulgaria”);
- Certificate of completion of a civic orientation course (within the training module “Start Bulgaria”);
- Integration profiles of the applicant and of each family member (if any);
- Copy of an employment contract (if any);
- Copy of a diploma (if any);
- Document certifying inclusion in the education system for persons aged under 18 (if any);
- Other relevant documents (if any).



4.3. Decisions on the applications

The National Integration Programme Department develops detailed eligibility criteria for inclusion in the Programme based on a scoring system. The certificates of completion of the training module “Start Bulgaria” (Bulgarian Language and Civic Orientation) are a mandatory precondition for the application to be considered by the National Committee for Refugees’ Integration with SAR’s Chairperson. The applicants’ failure to present such certificates or the relevant documents results in ex officio rejection of the applications, and the latter are not examined by the Committee.

The National Integration Programme Department drafts a reasoned opinion whereby it either approves or refuses the applicant’s involvement in the Programme. The opinion also contains a proposal regarding the municipality/district where the applicants will be accommodated based on his/her preferences, as stated in the integration profile, and the available places in the database with municipalities/districts.

By an order of SAR’s Chairperson, a special National Committee for Refugees’ Integration is set up with SAR’s Chairperson; its members are representatives of:

- Adaptation and Initial Integration Department;
- National Integration Programme Department;
- Other SAR departments, as decided by SAR’s Chairperson;
- Municipalities/Districts which have declared their preparedness to participate in the Programme and/or of the National Association of Municipalities in Bulgaria (NAMRB);
- International and non-governmental organizations;
- Other stakeholders (as decided by SAR’s Chairperson).

The Committee holds monthly sessions, and examines the motivated opinions issued by the National Integration Programme Department. The Committee either endorses or changes the proposals of the Department. Its decision on the applications is final. The Committee also examines cases of dropping out of the Programme (if the case be).

4.4. Communication with the local authorities

The National Integration Programme Department maintains an up-to-date database with municipalities/districts which wish to participate in the Programme. A municipality/district is included in the database on the basis of an application by the relevant mayor to SAR’s Chairperson. The application has an annex with information regarding the municipality/district, including housing opportunities, the state of the labour market, access to kindergartens and education, healthcare, etc. The Department drafts criteria for including municipalities/districts in the Programme database, and ensures that the data is updated at least once a year.



The Department, in coordination with NAMRB, develops information materials for the municipalities/districts, organizes information sessions and trainings for the mayors, and proactively seeks to build partnerships at the local level.

4.5. Integration agreement

Inclusion in the Programme and the parties to the subsequent integration agreement are determined by virtue of a decision of the National Committee for Refugees' Integration with SAR's Chairperson.

SAR serves the decision of the Committee on the applicant within 7 days after its session. The decision states the municipality/district with which the person can conclude an agreement, and the date on which the person shall appear for signing the agreement. The applicants are entitled to an opt-out from inclusion in the Programme.

The integration agreement is concluded between a BIP and a mayor of a municipality/district for a 1-year period. It can be extended for another year, if both parties wish so, with a source of financing other than the Programme.

The integration agreement provides for a set of measures for integration support in accordance with the individual's needs. The agreement is concluded in compliance with the effective legislation.

The agreement sets out:

- The parties to the agreement;
- The subject matter and the purpose;
- The duration of the agreement;
- An integration plan for all the members of the BIP's family (if any);
- The rights and obligations of the parties thereto;
- Performance indicators for the implementation of the agreement;
- The terms and procedure for termination.

The integration plan is drawn up by municipality/district staff, and includes specific integration measures, deadlines, and the persons responsible for the implementation thereof, as well as specific objectives and performance indicators. These integration measures can be, as follows:

Housing

Housing may be provided at the discretion of the mayor in: municipal flats/houses for the accommodation of citizens with identified housing needs (where this is in compliance with the relevant regulation on the use of such housing); municipal flats/houses from the reserve fund or municipal company flats, recreational resort houses on the territory of the



municipality/district, flats/houses on the free market, etc.

The municipality/district covers the overhead expenses, with the option of setting a limit for the sum in the integration agreement.

The municipality/district plans a budget for the initial provision of basic furniture, equipment, utensils and small household goods. The municipality/district can seek assistance from NGOs or donors for that purpose.

The mayor of the municipality/district may decide to inform the community in the neighbourhood about the accommodation of the relevant persons, and organize a meeting for getting acquainted.

Civil registration and issuing of IDs

After accommodation has been ensured, the municipality/district assists the BIPs with their civil registration and inclusion in the population register, the generating of a UCN, and subsequent issuing of ID documents.

The municipality/district covers the expenses for the issuing of an ID for persons aged over 14 years in an ordinary procedure.

If the relevant person wishes so, the municipality/district also assists with the issuing of a travel document or a passport, the cost of the service being covered by the BIP.

Healthcare

The municipality/district assists with submitting information to the National Revenue Agency about the UCN of BIPs and the correct entry of their health insurance status on the basis of the health insurance contributions made by SAR during the procedure for international protection.

The municipality/district also facilitates the registration with a general practitioner (GP) for all the relevant BIPs, and, depending on their health status (e.g. chronic diseases, age, etc.), plans for a budget to cover medical examinations and medication prescribed by GPs and/or specialist doctors.

In coordination with the GP and/or the specialist doctor, it assists with the issuing of a prescription booklet for a person with chronic diseases, decisions by a Medical Labour Expert Commission or vaccination at the RHI, when necessary, etc.

Education

The municipality/district provides assistance for the enrolment/transfer of children aged 0–3 years in municipal creches, children aged 5–6 years in kindergartens, and children



aged 6/7–18 years in state and municipal schools. Furthermore, the municipality/district helps parents lodge an application for additional Bulgarian language training for their children at school.

If necessary, the mayor plans a budget for transport cards, uniforms, educational materials and textbooks for children in the 8th grade and above. The mayor also assists with the recognition of diplomas certifying the completion of a certain educational grade by the school principal, the RIE or the National Centre for Information and Documentation (NCID) (if necessary).

During the school year, the municipality/district makes sure that children regularly attend school, that they are equipped with devices for online learning or, if possible, the municipality/district provides the devices (when necessary); keeps in touch with the relevant schools and addresses any emerging issues or concerns; facilitates the parents' communication with the teachers and the school management, and, last but not least, sends letters to the schools to notify them of children leaving the municipality/district.

The enrolment of children in school is a mandatory precondition for participation in the Programme. The parents' refusal to do so can serve as grounds to terminate the integration agreement.

Where adult refugees wish so, the mayor can assist with enrolment in a university and cover the tuition fee for the duration of the integration agreement.

Bulgarian language

The municipality/district ensures for adult BIPs free Bulgarian language courses, levels A2 and B1, 180 academic hours each within 3 months. The language training may be organized individually or in a group. The training provider can be an external company, a CVT, an NGO, a university or a natural or legal person that is competent to issue certificates. The municipality/district plans a budget for transport cards for the trainees, if the training takes place outside their home.

The relevant stages of the Bulgarian language courses are in conformity with the Common European Framework of Reference for Languages, and the curricula are based on MES's Programme for teaching the Bulgarian language as a foreign language to adult asylum-seekers or BIPs¹⁴. Each trainee receives a textbook from the training organization. The conditions for course completion are 80 % attendance and the test passed. Completion is proved by means of a certificate, which allows inclusion in subsequent training.

The participation of adult BIPs in language training is a mandatory requirement for remaining in the Programme. Exemptions are allowed only if the person can prove an objective reason for being unable to attend classes.

¹⁴ Accessible at the website of the Ministry of Education and Science: <https://mon.bg/bg/100681>



The failure to regularly attend classes can serve as grounds to terminate the integration agreement.

▼ **Employment**

The municipality/district registers with the local EO all the individuals who have the right and have declared their wish to work within 3 months after receiving international protection.

The municipality/district, in cooperation with other municipalities, may organize vocational training. Such training is to be conducted by a CVT or another licensed institution.

When possible, the municipality/district provides employment at municipal enterprises for persons who have the right to work. The municipality makes such working hours arrangements that allow attending the Bulgarian language course.

The municipality/district can build a network of socially responsible employers who are willing to offer internships or employment to BIPs.

The municipality/district may facilitate opening a bank account for persons of working age.

▼ **Social assistance and social services**

All BIPs who have concluded an integration agreement are entitled to monthly integration allowance which ensures their subsistence while attending Bulgarian language or vocational training courses (when possible). The amount of the monthly integration allowance is determined in accordance with the Programme rules. The initial allowance is received upon the BIP's accommodation, while subsequent payments are conditional on the enrolment of children of mandatory school age in school and their regular attendance, as well as on adults' regular attendance of Bulgarian language classes.

The mayor has the discretion to decide if the municipality/district may grant another one-time social allowance to BIPs involved in the Programme within the time limit of the agreement.

The municipality/district assists BIPs with registering at the relevant Social Assistance Directorate within 3 months after the signing of the agreement; helps BIPs lodge applications for monthly or targeted social allowances, for family allowances for children; refers the persons concerned to legal aid in cases of unlawful refusal, and facilitates, by and large, the referral to a social service, when necessary.

▼ **Information provision and empowerment**

The municipality/district provides BIPs with information about their rights and obligations, available support, including legal aid, opportunities for development, etc.

The mayor has the discretion to decide if the municipality/district can organize a follow-up civic orientation course, which will deepen the knowledge acquired as a result of the training module "Start Bulgaria".



The municipality can refer BIPs to cultural, civic, sports, volunteer, etc. local initiatives which will allow both children and adults to develop their talents and interests, and will strengthen their connection to the host community. The mayor may decide to build a partnership with a community centre, NGO, etc. on the territory of the municipality/district.

The two parties to the agreement (municipality/district and BIP) may choose which of the above measures will be part of the agreement. For example, the services to be provided might not include housing but only assistance with access to services or a Bulgarian language course. Nevertheless, an important consideration is that the monthly integration allowance is crucial, as it enables BIPs not to engage in employment, and, instead, invest efforts in learning the Bulgarian language. The funding which municipalities/districts receive is determined by the type of support they provide (see section “Funding”).

4.6. Implementation of the integration agreement

With a view to delivering its obligations under the Ordinance on the Integration Agreement, the municipality/district can apply either of the following two options:

- Designate an employee who will be responsible for the implementation of all the agreements concluded. At the mayor’s discretion, the task is assigned to an employee who is on the municipality’s/district’s payroll or to an employee who will be specifically hired for that purpose;
- Delegate these activities to an NGO which has expertise and experience with refugee integration activities. One or more of the activities included in the agreement may be delegated to one or more NGOs.

The mayor has the duty to ensure interpreters who will work together with the employee responsible for the agreement. The employment contractual relations with the interpreter are determined by the mayor.

The responsible employee and the interpreters work in cooperation and are provided with support by the relevant municipal departments and regional structures of the national institutions. The responsible employee and the interpreters receive appropriate training.

4.7. Performance indicators for the integration agreement

Each integration plan sets out some performance indicators for the effectiveness of the integration process. These indicators measure the progress achieved in the following sectors:

Housing

In particular, the indicators verify:

- Legal security of tenure;
- Accessibility of services and infrastructure;



- Affordability;
- Habitability;
- Physical accessibility;
- Location;
- Cultural specificity¹⁵;
- Information provided about seeking accommodation after the end of the agreement, etc.

▼ **Civil registration and ID documents**

In particular, the indicators verify:

- Inclusion in the population register;
- An ID document issued;
- Registration at an actual address, etc.

▼ **Healthcare**

In particular, the indicators verify:

- Health insurance contributions;
- Registration with a GP;
- Certificate for completed vaccination of persons aged up to 18 years;
- Prescription booklet for a person with chronic diseases;
- Decisions issued by a Medical Labour Expert Commission for persons with disabilities, etc.

▼ **Education**

In particular, the indicators verify whether:

- The children have been enrolled in kindergarten or school and if they attend regularly;
- They have completed an additional Bulgarian language course under the terms of MES Ordinance No 6 on Acquiring the Bulgarian Literary Language, and their performance¹⁶;
- The children take part in additional and extra-curriculum activities at school, and the results achieved;
- They have the necessary educational materials;
- Their parents keep in touch with the teachers, and if they are satisfied with the communication;

¹⁵ According to the 1991 Criteria of the UN Committee on Economic, Social and Cultural Rights

¹⁶ Ordinance No 6 of 11 August 2016 r. on Learning the Literary Bulgarian Language – <https://mon.bg/bg/100104>



- The parents have completed the mandatory Bulgarian language courses, and the results achieved;
- The adults who wish to continue their education or to engage in regulated employment have their qualifications recognized;
- Any BIPs have enrolled in higher education, etc.

▼ **Employment**

In particular, the indicators verify whether BIPs:

- Are registered with the EO, and the results therefrom;
- Have received professional counselling, and the results therefrom;
- Have a CV drafted, and the results therefrom;
- Have been engaged in employment, and the results therefrom;
- Have been involved in subsidiary employment, and the results therefrom;
- Have been involved in vocational training, and the results therefrom;
- Have their own business, and the results therefrom, etc.

▼ **Social assistance and social services**

In particular, the indicators verify whether BIPs:

- Receive a monthly integration allowance, and if it is sufficient for them;
- Receive monthly or targeted social assistance;
- Receive family allowances for children, etc.
- Use social services, and the results therefrom, etc.

▼ **Information provision and empowerment**

In particular, the indicators verify whether BIPs:

- Are familiar with their rights and obligations in Bulgaria;
- Know where to seek advice and support (incl. legal aid, etc.);
- Participate in cultural, civic, sports or other activities conducted by local organizations, and how satisfied they are with them;
- Are informed about the procedure for applying for Bulgarian citizenship;
- Have a self-evaluation of their integration, their capacity to tap into their potential, and areas where improvement is needed, etc.

4.8. Funding

The budget for the integration activities for refugees is ensured by the responsible Deputy Prime Minister from the state budget, EU funds or other sources. The main source of



such funding can be the Asylum, Migration and Integration Fund: SAR receives funds for integration by directly allocating a percentage of the funds under the specific objective “Legal Migration and Integration of Third-Country Nationals”.

SAR manages this budget, and monitors the target-oriented use of the funds. SAR, via its National Integration Programme Department, concludes a financing contract with a municipality/district that will implement an integration agreement. The Department determines the financial parameters for each activity in the agreement, including the payment due to the responsible employee and the interpreters.

Each municipality/district which has concluded a financing contract under the Programme is entitled to delegate the implementation thereof to an NGO. It is possible to delegate one or more activities from all the activities set out in the agreement to one or more NGOs.

Each municipality/district submits a financial and narrative report to SAR during the implementation of the agreement and after the completion thereof. An integral part of that report is an annex with the integration performance indicators.

The staff of the Adaptation and Integration Department are civil servants whose remuneration is ensured from the state budget.

4.9. Justification

Restoring the National Programme for Refugees’ Integration by engaging the municipalities/districts allows combining the most effective elements of the two models of the integration policy that have so far been applied in Bulgaria: coordination by a single authority (SAR), and integration activities at the local level (municipalities/districts). The referral of BIPs to municipalities/districts will also put an end to the unlawful practice of civil registration at fictitious addresses and the illicit trading in such addresses. This model allows BIPs to have a smooth transition from their stay at SAR’s RRCs to municipalities/districts, and serves as a stable foundation for their successful long-term integration in Bulgaria.

The eligibility requirements for the applicants – completion of a Bulgarian language course and a civic orientation course (in addition to the detailed requirements to be developed by the National Integration Programme Department) – allow identifying motivated individuals who wish to settle in Bulgaria. The possibility to include only a part of the activities in the agreement, with the respective budget funds allocated, allows flexibility with respect to the variety of individual needs, and broadening the scope of BIPs who will benefit from integration support.

SAR has accumulated solid experience in managing the National Programme for Refugees’ Integration during the period 2005–2013.

The involvement of numerous stakeholders as members of the Committee for Refugees’ Integration with SAR’s Chairperson is a guarantee for transparency, expertise and support.



5. Conclusion

As of June 2022, Bulgaria does not have an effective integration system for refugees due to serious gaps in the legal framework and its application. On the one hand, this situation hinders the settling and the integration of persons who have been granted international protection by Bulgaria, which makes the state a “transit” one. On the other hand, it prevents Bulgaria from benefiting from the economic and human capital that refugees have. In the context of a diminishing and ageing population, low birth rate and insufficient workforce for the labour market, refugees can serve as a resource for the country’s development and can make a contribution by means of their skills, ideas and energy.

This Manifesto on Refugee Integration in Bulgaria was drafted by Multi Kulti Collective and Bulgarian Council on Refugees and Migrants in partnership with UNHCR Bulgaria with the aim to offer an alternative to the current model. The Manifesto has been developed with the participation and contribution of a broad range of stakeholders, including government institutions, municipalities and districts, international organizations, NGOs, the academia, businesses, and refugees.

What the Manifesto proposes is restoring the National Programme for Refugees’ Integration which was operational in 2005–2013 when the Programme was implemented by SAR with funding from the state budget and was defined as a good European practice. Moreover, the Manifesto proposes upgrading the Programme with the now effective legal framework – the Ordinance on the terms and procedures to conclude, implement and terminate integration agreements with beneficiaries of asylum or international protection – which provides for the active participation of municipalities and focuses on integration at the local level. Applying the best aspects of the two approaches ensures that while being in the procedure or soon after receiving a status the persons will start the adaptation process, and only those who are motivated will have the opportunity to participate in the integration programme at the local level.

With a view to the above, several basic changes are proposed:

Setting up a new institutional structure, which includes:

- **The designation of a Deputy Prime Minister**, who is responsible for the overall planning and implementation of the integration policy for refugees in Bulgaria. He/She will be assisted by the CoM administration;
- **Broadening the scope of competences of SAR** by establishing an Adaptation and Integration Directorate with three departments: Adaptation and Initial Integration; National Integration Programme; and Information and Analysis. Thus, on the one hand, SAR will carry out activities while the applicants are still in the procedure for international protection, and, on the other hand, it will finance and monitor the integration activities carried out at the local level by municipalities/



districts that have declared their wish to do so. Last but not least, SAR will have a specialised department whose task will be measuring the effect from these activities and will regularly make proposals to the responsible Deputy Prime Minister about changes in the legal framework with a view to improving refugees' integration;

- **The active involvement of municipalities/districts** which are willing to host refugees for integration on their territory, and receive, for that purpose, targeted funding and support.

Developing a comprehensive integration process at two stages:

- **Adaptation and initial integration** – this process involves both persons who seek asylum and persons who received international protection within the last one year. Such an approach allows to identify those who are motivated and offers them opportunities for development in Bulgaria. The initial stage of adaptation comprises a training and a practical module. The training module “Start Bulgaria” includes Bulgarian language training A1 level; civic orientation training; and providing refugees with an overall idea about their future and development opportunities in Bulgaria, including specific goals for them to pursue. The practical module includes involvement of minor and underage persons in education; access to the labour market for adults; and, where possible, building relations with the host community via contacts with institutions, volunteers, companies, etc.;
- **National Programme for Refugees' Integration** – concluding a one-year integration agreement between a refugee and a municipality/district. The agreement provides for the provision of flexible support such as housing, civil registration and issuing of IDs, Bulgarian language training, education, healthcare, employment, social assistance and social services, monthly integration allowance, information provision and empowerment.

In view of the above, the responsible Deputy Prime Minister has to ensure **sustainable funding** from the state budget, EU funds or other sources.





5.1. Recommendations

The following recommendations are made on the basis of the national roundtables, expert meetings and online consultations conducted with a broad range of stakeholders, including refugees, and the Manifesto on Refugee Integration in Bulgaria:

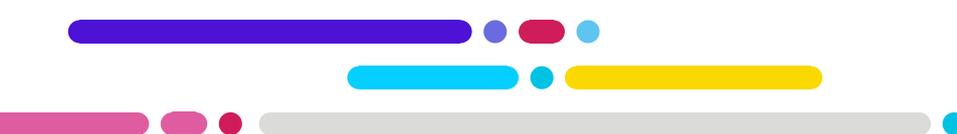
-  **Reconsidering the model of refugee integration.** In view of the demographic crisis in the country, the diminishing and ageing population and the insufficient workforce for the labour market, which impedes the development of the economy, the role played by refugees should be reconsidered: not as a threat and a burden, but as an opportunity for the development of the state;
-  **Designation of a responsible body at the highest political level.** The now effective legislation requires that this body shall be a Deputy Prime Minister. However, since 2017 such a body has not been designated in spite of repeated requests from NGOs. The designation of such a responsible body is a prerequisite for Bulgaria to have a national strategy for refugees' integration, annual plans, sustainable funding, and support from all the institutions;
-  **Provision of sustainable funding.** The implementation of an integration policy is conditional on financial provision. The good practice from the past should be re-instated: in 2005–2013 Bulgaria used to implement a National Programme for Refugees' Integration which was funded from the state budget and was recognized as good practice in the region of Central and Eastern Europe. The funding for integration activities can be ensured from the state budget, EU funds, including the Asylum, Migration and Integration Fund via direct allocations to SAR or from other sources;
-  **Restoring the National Programme for Refugees' Integration from 2005–2013 and upgrading it with integration at the local level.** This will allow using the best aspects of the two approaches applied by Bulgaria since 2005. On the one hand, the applicants will have access to adaptation activities on the premises of RRC while being in the procedure or soon after receiving a status, and the process will identify those who wish to make efforts with the aim to have long-term integration in Bulgaria. This is a certain safeguard that the individuals who sign an integration agreement with a municipality/district have indeed set their mind on settling in Bulgaria. On the other hand, after receiving a status, these individuals will be provided with support for real integration at the local level with the assistance rendered by the municipality/district, which best meets their needs. Both stages of the activities proposed envisage Bulgarian language training up to B1 level of the European Framework of Reference for Languages, as European research shows that mastering the local language is crucial to successful integration. Other important highlights are civic orientation, education, employment;



-  **Ensuring flexibility of integration activities.** Integration is an extremely complex process which should allow for sufficient flexibility in the actions of the responsible institutions and refugees; thus, the latter will enjoy the best benefits from what they need for their success. The first stage of the integration measures proposed is targeted at both asylum-seekers (whether they are accommodated in an RRC or not) and persons who received international protection within the last one year. Hence, refugees are able to start their adaptation as early as possible while being in the procedure, and after the completion thereof – if they change their mind and decide to get integrated in our country. The second stage of the measures proposed, namely the National Programme for Refugees' Integration, is also flexible with respect to integration measures. Flexibility is ensured not only for SAR but also for the municipalities/district which can choose whether they will organize the integration activities on their own or will delegate them to NGOs or other organizations with appropriate experience and expertise;
-  **Motivating refugees to settle in Bulgaria.** Research shows that asylum-seekers often perceive our country as a “transit” one and plan to move on to countries in Western Europe for economic, personal and other reasons. This phenomenon can be attributed to both preconceived negative expectations (e.g., in the refugee communities), as well as to the fact that Bulgaria does not offer them much either upon their arrival or after receiving a status. In order to retain refugees, Bulgaria should offer them a future, various opportunities for employment, education, life. This is why, activities aimed at getting acquainted with the host society, building initial relations with Bulgarians and setting personal goals for the future are planned to start as early as the adaptation process;
-  **Motivating municipalities/districts to host refugees.** The efficient involvement of the local authorities in the integration process requires that they are motivated and provided with the necessary resources for the additional activities they carry out. They should be encouraged to attract new citizens to their territory; however, this being a new activity for most of them, they should be offered substantial support related to training, enhancing their capacity and addressing current issues and challenges they may face;
-  **Engaging civil society structures and refugees in the integration process.** The stakeholders in refugees' integration include a number of international organizations, NGOs, the academia, businesses, and the refugees themselves. Over recent decades an active and efficient professional community has been built in our country, which supports integration by means of advocacy, research and analyses, provision of direct services to refugees, connections to the host community and the media, etc. The capacity and expertise accumulated should be made use of; hence, it is proposed that civil society structures and refugees be engaged as much as possible in developing the national policies, their implementation and evaluation. This can be achieved via the National Committee for Refugees' Integration to be established with SAR's Chairperson, which will make the decisions on the applications lodged by refugees for participation in

the National Integration Programme, as well as by delegating to them integration activities on RRC premises and at the local level, and via their participation in the national roundtables organized by the responsible Deputy Prime Minister, etc.;

-  **Regular analysis of efficiency and the results achieved, and ongoing improvement of refugee integration policies.** Regular monitoring and analysis of refugee integration policies and practices, and timely addressing structural issues will allow finetuning the legal framework and the programmes applied. In addition, it will allow a systematic exchange of best practices among municipalities/districts with a view to learning from each other and adopting good EU practices. All of the above will ensure effectiveness of the financial resources used and of the human resources invested. A new Informational and Analysis Department, with a focus on this particular activity, should be established at SAR.





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