

Comments on

National Strategy for Roma Inclusion: Bulgaria

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As one of the initiators of the decade of Roma Inclusion (2006-2015), Bulgaria has a several years of experience of strategic planning and implementation of programs with regard to Roma inclusion. The NSRI projects the accumulated knowledge and capacities of the Bulgarian state administration responsible for managing Roma integration. The key authority responsible for Roma integration is the National Council for Cooperation on the ethnic and integration issues (NCCEIE).

"The Strategy builds on what was achieved in the ten-year period of the Framework Programme for Roma Integration in the Bulgarian society and it includes the fully developed, updated and adopted by the Council of Ministers on 12 May, 2010 strategic document: Framework Programme for Roma Integration in the Bulgarian Society 2010-2020 which was the outcome of broad discussions within the Roma community, the civil sector, the responsible public institutions and the academic community."

1/ Involvement of regional and local authorities and civil society

The NSRI involves the different levels of national authorities – at local, regional and state level. The accompanying Action Plan (AP) clearly indicates which authorities are responsible for the particular measures as well as the timeframes for the implementation of the provisions.

The civil society is involved by including representatives of CSO (and especially of Roma CSOs) in the established consultative and advisory councils as well as in the regular meetings of the National Council for Roma Integration (a state —level agency responsible for the implementation and coordination of Roma inclusion policies and programs). Furthermore, the AP addresses other groups of the civil society — e.g. parents of students, mediators — and suggests measures for involving them in the implementation of the indicated measures.

The NATIONAL REPORT of 2012 states that between June and December 2012 there were 3 meetings (trainings) organized with the regional, local and Sofia-district authorities (mayors and representatives of the administrations). With the support of the World Bank, a methodology for implementing the provisions of the Strategy at local level was elaborated and communicated to the stakeholders.

2/ Allocation of financial resources

The AC indicates the resources for each identified measures. The funds are provisioned from the National Budget, from the Delegated budgets of the local and regional authorities, from the Delegated budgets of the schools. EU funding is indicated with concrete amounts and relevant programs. Some of the existing and already functioning sources (e.g. the EU Structural Funds) are



also indicated against the relevant programs. It is difficult to assess the efficiency of the proposed expenditures since there is a lack of comparative basis.

The Action Plan provides the financial estimates for the period 2011-2015.

3/ Monitoring to enable policy adjustments

A monitoring strategy has been suggested in the NRIS. Monitoring is foreseen with regard to the implementation of the AP and the control over the expenditures of resources. With regard to the identified needs for changes in the national law, an inter-agency group (incl. CSOs representatives) was formed in 2012. The group is headed by the Head of the Cabinet of the Minister of Interior.

For the purposes of securing resources for the implementation of the NSRI, a second inter-agency group (incl. CSOs representatives as well) was established in 2012. The group is headed by the Minister of the EU Funds.

To ensure quality of monitoring a Memorandum of Understanding was signed with the WB and a conference held in 2012.

4/ Fighting discrimination convincingly

In the NRSI Action Plan a particular chapter has been developed indicating the measures provisioned to fight discrimination. These measures address the fields of justice, education, healthcare, social services, training needs, raising tolerance, etc. The National Report 2012 indicates that there is has been started a communication with the National Ombudsman for cooperation on the issues related to antidiscrimination of Roma.

The PROBLEM:

Although developed in details and covering all the required issues (developed as a set of measures with assigned authorities responsible for implementation, with reference to involvement of CS, provisioned and allocated resources, monitoring mechanisms, etc), the BG NSRI would hardly bring about a positive with regard to the effective integration of Roma (with horizon 2020).

The factors that lead to this conclusion can be divided into 1/ Strategy weaknesses and 2/ weaknesses of implementation.

1/ Strategy Weaknesses

- There is a lack of general scope: what will this Strategy aim to achieve as a minimum by 2020
 or as a maximum.
- The main problem of the strategy is that despite of being very detailed, the measures do not
 develop logically building one over the other, but are listed as a set of positive policy
 practices. There is no priority of measures nor classification e.g. short-long term measures /
 basic advanced, etc. The indicated periods for implementation are too long (in general



about 2 years) and there is no reference how success will be evaluated or how they will be adjusted if they do not bring the expected results.

- Although housing and healthcare problems are related mostly to funding, labour and hence social problems could not be overcome without overcoming the educational deficits. This is a particularly challenging area, which requires a specific understanding and strategic approach developed not only with regard to EU requirements but also to the cultural aspects of community attitudes. Nothing of the type exists in the strategy.
- The National Report 2012 shows certain success in the field of healthcare combining resources and culture-related approach through mediators. The issues however is that the success is based on the fact that all services are provided to Roma "free of charge". The situation will deteriorate as soon as the Bulgarian citizens of the Roma community are required, in pursue of the national law, to become regular payers to the National Healthcare system (payments obligatory for ALL Bulgarian citizens)
- The Strategy lacks proper indicators for monitoring and measuring success of implementations
- The use of resources cannot be not justified as cost-effective measures do not stem one from another and there is no priority of spending
- Discrimination of Roma in Bulgaria is often a social issue (based on their lack of education) but sometimes an 'ethnic' issue parents from the majority community withdrawing their children from "integrated" glasses! No proper measures are developed to tackle the tolerance problem.

2/ Implementation Weaknesses

- The implementation weaknesses stem from the Strategy weaknesses. The detailed Action Plan in fact does not enable implementation since there is no priority of tasks and measures. It appears that currently implementation is following the principle of the "easiest to do first", than a plan for strategic and logical (step-by-step) development. A serious challenge to the implementation hence would be a change in the Administration (next Parliamentary elections due June 2013) since the leading agency is closely tied to the Government.
- The political perspective is also problematic since without the step-by-step and justified program reporting success (in some areas/measures) could come before the goal of achieving real positive change.
- Although there are attempts to involve local levels in implementation, very serious training is needed for local administration (and communities raising awareness and tolerance)
- The social problems in the Bulgarian society make the Roma integration measures being interpreted as "positive discrimination" and increases confrontations between members of minority and majority community
- Implementation is challenged by the lack of benchmarks (for quality and success)