**SHORT ANALYSIS AND RECOMMENDATIONS ABOUT THE BULGARIAN ROMA STRATEGY**

Roma Education Fund

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The National Strategy for Roma Integration in the Republic of Bulgaria (2012-2020) is the third strategic step of the Government of Bulgaria after the first Framework for Roma (1999), the second one (2010), to provide Roma, EU institutions and the international community with the vision of how Roma community would be better included in the mainstream society by 2020.

Generally, the strategy answers all international documents in the field of social inclusion. It is in line with basic national strategic and operational documents in the country like the Framework Program for Integration of Roma in Bulgarian Society 2010-2020, approved by the Government in May 2010, the National program for school education and pre-school education and training (2006-2015), the Plan for decreasing the number of dropping out and children who are not enrolled in school and are at compulsory school age, last but not least, with the Strategy for educational integration of children and students from ethnic minorities and of course with the Law for Protection Against Discrimination that gives the legal base for all Roma related policies implementation locally and nationally.

It is also important to notice that the vision of the state authorities in Bulgaria to the strategy implementation is to use as leading principles the ten common basic principles on Roma inclusion, adopted by the Council of the EU on 6 June 2009. Mainstreaming and targeting of Roma related policies implementation is part of the strategy, which is a base to conclude that official authorities realized more resources (administrative, human, financial) are necessary to be invested in marginalized communities in order to fill in the gap between the social status of the Roma minority and the majority population in the country.

Along with all mentioned above, we have to notice that the strategy has its weak parts that you will present with below:

The submitted documents says in its introduction part “The National Roma Integration Strategy of the Republic of Bulgaria (2012-2020) is a strategic document, an expression of the political commitment of the Government to the European development of Bulgaria, in line with the National Reform Program of the Republic of Bulgaria (2011-2015)1 and with the National Action Plan for the Decade of Roma Inclusion 2005-2015 initiative”.

The Roma Education Fund support and very much encourage the link between important strategic national document but we have to point out that the National Reform Program of Bulgaria (NRPB) (2011 - 2015) refers to Roma only in regard to the “Social inclusion” project funded by the World bank in Bulgaria and some measures related to social housing *(NRPB page 83 and 84, sources:* [*http://www.minfin.bg/bg/page/573*](http://www.minfin.bg/bg/page/573)*).* The housing policy is included also in the action plan of the program *(page 126, measure 189.2, the same source)* but there is no money allocated and the text speaks about “looking for opportunities”.

We think that the opportunity exists through the Regional Operational program, which can use the resources provided by the European Regional Development Fund. In this regard it is a matter of decision within the Monitoring Committee of the operational program to plan such measures and allocate funds.

In section of the strategy ІІ. CURRENT STATUS OF THE ROMA COMMUNITY “Data from the National Statistical Institute from the population and housing census of 2011 shows that the Roma ethnos remains the third largest ethnic group in Bulgaria - 325 343 persons, i.e. 4.9% of the Bulgarian citizens identified themselves as belonging to the Roma ethnos.

We have to say that the current state data presented in the document is not correct as other past and recent researches shows that approximate number of Roma population in the country is about 800 000 thousand people *(source:* [*www.osf.bg/downloads/File/RomaGuideFinal.pdf*](http://www.osf.bg/downloads/File/RomaGuideFinal.pdf)*) .*

In this case we think that the state has to develop and set up a mechanism for data collection and protection of the data. Possible way to collect data collection can be a geographically based approach so that most vulnerable groups are identified and policies planned are to be measurable and cost effective.

The BG Roma Strategy in its educational part clearly shows that Bulgarian institutions recognize education of Roma as a high priority in their agenda. But at the same time we have to say that presented data from the National Statistical Institute (NSI) about the education of Roma is controversial with the data from other sources, which could be an obstacle to clear up the picture with the educational status of the Roma community. The NSI (2011) data defines Roma with higher 0.50%, secondary 9.0%, basic 40.8 %, primary 27.9 %, uncompleted primary and illiterate/ non-attendance 21.8 %. Other data says that Roma with higher and secondary education are small - only 7.2%, with primary education 44.9%. The proportion of illiterate Roma is 12.7%. Particularly alarming is the trend of continuous increase of illiteracy among the Roma. The proportion of illiterate Roma aged 15-64 years in the period between the last two censuses has increased by about 50%.

(*Sources*: [*http://www.az.government.bg/Projects/Prog/Roma/Frame\_Roma.htm*](http://www.az.government.bg/Projects/Prog/Roma/Frame_Roma.htm)*).*

The government has to assure that the existing admin system of the Ministry of Education, Youth and Science provides accurate information about the ethnic profile of enrolled, dropped out and completed certain levels of education (primary, secondary and high).

The strategy also defines very well that functional illiteracy is three times more frequent among Roma women than men. “Promoting affirmative actions aimed at overcoming the traditional practices of the Roma community that violate the rights of women and children” is pointed out in the horizontal aspects but nowhere in the priorities and task actions to deal with these issues are included.

In section 1. PRIORITIES, 1. EDUCATION task 4. Prevention of early school leaving and teaching the illiterate and barely literate adult Roma citizens answers big challenge but we have to point out that financial resources are not included in the Law for the state budget for 2012. There is opportunity in the Human resources Operational program and the Ministry of Education, Youth and Science should take decision and proposed to the managing authority (Ministry of Labor and Social Policy) to initiate operations in this field as soon as possible till the end of the current programing period 2013 and plan new ones for the next 2014 - 2020.

Another important problem identified in the document is that “Part of the Roma children do not speak the official Bulgarian language well enough when enrolled in school, neither have they acquired the basic knowledge and skills needed to cope with the learning process”.

We would say that the problem is well defined but again data is not available for the proportion of those who face this problem. We do not see the answer how the state will cope with that problem in the priority task in Education part in the strategy, in the existing legislation, and in the budget allocation.

It is quite important that the implementation of the educational measures of the Strategy will contribute to the achievement of the Bulgarian national goal 4 from the National Reform Program i.e. “share of early leavers from educational system of 11% by 2020 and share of 30-34 years old with higher education - 36% by 2020. Indirectly this contributes to achieving the national goal 5" Reducing the number of people living in poverty 260 thousand people".

But in order to achieve these indicators by 2020 the government should take into account that kindergarten and preschool enrolment (compulsory preschool at the age of 5 introduced by the government itself) are the bases for the good start of the children coming from poor families and most important is to assure that education for Roma children at this age is fully accessible and free of charge.

Now in the existing legislation (Act for Education, changed and added In October 5th, 2010, state newspaper issue 78) and in the official state budget there is no any possibility to ensure that. The action plan developed for the strategy implementation also does not have financial resources planned.

Another important element in the strategy is about Enrolling and retaining in the educational system all Roma children and students, ensuring for them high quality education in a multicultural environment

REF very much agrees with this although we do not see the solution of ensuring the multicultural environment. We still face school segregation, isolated schools, no real state support for desegregation from the state. The Center for educational Integration of Children and Pupils from Ethnic Minorities has an annual budget of 600 000 BGN for its activities which is nothing in regard to the issues Roma children in marginalized Roma communities are facing.

The strategy says that Roma graduates do not identify themselves as Roma after completing higher education.

There is no answer to this problem raised, no Roma identity, language or culture education in the Bulgarian educational system. In the Educational Act there is no mentioned the right for preserving the language and of the minorities.

The state has to invest in tertiary education for Roma through providing scholarships for Roma disadvantaged students and students with good academic results, prepare proper number of Roma teachers, economist, medical workers, etc to assure the equal integration of Roma professional in the labor market. The Higher Education Act does not provide affirmative measures for fulfilling these goals. Enrollment is per competition, public places in the universities are distributed by competitive measures. For the last three academic years REF provided 857scholarships for Roma students in Bulgaria. High education institutions in Bulgaria also do not provide such support to disadvantaged Roma students. Currently the Ministry of Health plans to contribute 10 Roma medical students with best academic results with total amount of 50 000 BGN for scholarships.

The strategy clearly defines that “The Ministry of Education, Youth and Science is the leading institution responsible for the achievement of the objectives of the Strategy, defined under priority Education”.

REF very much appreciates the strong commitment of the government that all related institutions are responsible for the sectorial policy implementation. It is written down in the document that one of the mechanisms for that is optimization of the model of allocation of management responsibilities among the executive bodies but at the same time we have to say that in order to have this happen a legal frame for the strategy implementation should be developed and set up. Attention should be paid to the educational institutions (Ministry of Education, Youth and Sciences (MoEYS), Regional Inspectorates of Education, Educational departments in local authorities) for improvement of the legislation in the field of early childhood education and care, desegregation of schools located in Roma communities, mother tongue learning and adult learning. The existing Center for Educational Integration of Children and Pupils from Ethnic Minorities under the authority of the MoEYS needs to be included as a direct beneficiary under the “Human Resources Development” Operation Program in Bulgaria in order to assure the implementation of Roma educational policies implementation at local level through the active involvement of the local authorities and civil society organization.

REF very much supports that “the strategy encourages affirmative actions for overcoming the various forms of inequality in all public sectors” but we miss the concrete targets like number of free places for Roma students, number of jobs in the public sphere, etc.

REF also agrees to the point made on 5. RULE OF LAW AND NON-DISCRIMINATION 2. Efficient implementation of Roma integration policies with a view to ensuring equality, decent life and full participation in public life but to have that in reality the government should develop and implement efficient and targeted use of available resources (administrative, budget, human, etc) at the national, regional and local level.

In the last part of the mechanisms for implementation of the policy “Ensuring financial resources for the integration policies and program, to be allocated from the national budget, the European funds and other sources” we have to say that currently this is not part of the state budget, which put the strategy implementation into risk. There are some small operations under the Human recourses development program but it implies the mainstream approach not the targeting one in the field of Roma education.

In the monitoring and evaluation section the strategy defines that the coordination and control of the implementation of the Strategy and of the APs shall be implemented by the National Council for Cooperation on Ethnic and Integration Issues (NCCEII). We have to raise our reservation that the state put itself in a sort of conflict of interest.

A well-developed and put into practice methodology for monitoring and evaluation that will be providing information though the whole strategy implementation cycle and will be a baseline data for re-planning and improving actions accordingly has to be set up. Civil society organizations have to be part of the process in order to assure the transparency of all actions initiated and implemented by the state authorities. Along with that a communication and public awareness of all policies related with Roma integration actions have to take place regularly: a development of National data base for Roma integration policies implementation accessible to the public can provide up-to-date and correct information to the public about the integration policy for Roma in the country.