

# Fundamental rights of children displaced in the EU following the Russian war of aggression

Bulgaria

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# 1. Children fleeing Ukraine

## 1.1. Data on children fleeing Ukraine

**Table 1 Children fleeing Ukraine**

Category of child	Registration system Y/N	Number of children (as disaggregated as possible)
Overall number of children	Y	53,867 (as of 9 June 2023)
Arrived accompanied by mother, father or another legal guardian	N	N/A
Arrived without parents, but with other family members, neighbours or family friends	N	N/A
Arrived unaccompanied	Y	589 (as of 9 June 2023)
Arrived within a group of children, as an organised evacuation from Ukrainian institutions or foster carers (with or without an appointed legal guardian)	N	N/A
Arrived within a group of children, through private initiatives, such as football clubs (with or without an appointed legal guardian)	Y	N/A

Source: State Agency for Child Protection (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

In **Bulgaria**, the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*) maintains a register with the number and names of all children displaced from Ukraine. The data provided by the SACP refers to children granted temporary protection since the beginning of the war until 9 June 2023 irrespective of their nationality. The data is not cross checked with border control data and there is no information on how many of these children have stayed in the country.

Data as of 30 April 2023, data disaggregated by category of children, with the exception of unaccompanied children, and data disaggregated by other characteristics are also not available.<sup>1</sup> The number of unaccompanied children covers all children who arrive without their parent(s) or guardian(s), including children who are travelling with other adult family members (grandparents, older brothers or sisters, etc.) or other persons they know.<sup>2</sup>

In **Bulgaria**, the Ministry of the Interior (Mol) (*Министерство на вътрешните работи*, MBP) registers all persons entering or leaving the country through the border checkpoints, including children. The data is recorded in the Automated Information System “Border Control” (*Автоматизирана информационна система „Граничен контрол“*). The recorded information includes nationality, name, date of birth, sex, personal identification number, purpose of travelling, and the type, number and issuing country of the person’s identity document. Access to the registered information is granted only to police officers.<sup>3</sup>

In **Bulgaria**, the State Agency for Refugees (SAR) (*Държавна агенция за бежанците*, ДАБ) registers all persons granted temporary protection, including children. The data is recorded in the Automated Information System “Refugees” (*Автоматизирана информационна система „Бежанци“*), which has a separate module for registering persons with temporary protection. Authorised to access the system are the officials of the State Agency for Refugees (SAR) (*Държавна агенция за бежанците*, ДАБ) and the Migration Directorate (MD) (*Дирекция „Миграция“*) of the Ministry of the Interior (Mol) (*Министерство на вътрешните работи*, MBP).<sup>4</sup>

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<sup>1</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>2</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>3</sup> Bulgaria, Ministry of the Interior (*Министерство на вътрешните работи*) (2023), Letter No 812100-10399-1/16.06.2023 to the Center for the Study of Democracy, 16 June 2023.

<sup>4</sup> Bulgaria, Ministry of the Interior (*Министерство на вътрешните работи*) (2023), Letter No 812100-10399-1/16.06.2023 to the Center for the Study of Democracy, 16 June 2023.

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## 1.2. Crimes against children fleeing Ukraine and children going missing

**Table 2 – Serious crimes against children fleeing Ukraine and children going missing**

Issue / risk	Number of cases i) reported and ii) investigated
Violence, including domestic violence	3
Sexual abuse	1
Trafficking for exploitation	0
Children reported as missing	0
Other crimes against children fleeing Ukraine	9

Source: Ministry of the Interior (2023), Letter No 812100-10399-1/16.06.2023 to the Center for the Study of Democracy, 16 June 2023.

In **Bulgaria**, the Ministry of the Interior (Moi) collects data on the number of registered crimes. According to this data, since the beginning of the war in Ukraine, a total of 13 crimes against Ukrainian children have been recorded (five against children under the age of 14, and eight against children between 14 and 17 years). All three recorded cases of violence are cases of domestic violence. The sexual abuse case relates to the attempted rape of a child aged between 14 and 17 years. The other crimes include eight cases of property crime and one case of hooliganism.<sup>5</sup> There is no information on the stage of these cases and their outcome. No children from Ukraine were reported as missing through the Schengen Information System (SIS).<sup>6</sup>

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<sup>5</sup> Bulgaria, Ministry of the Interior (*Министерство на вътрешните работи*) (2023), Letter No 812100-10399-1/16.06.2023 to the Center for the Study of Democracy, 16 June 2023.

<sup>6</sup> Bulgaria, Ministry of the Interior (*Министерство на вътрешните работи*) (2023), Letter No 812100-10399-1/16.06.2023 to the Center for the Study of Democracy, 16 June 2023.

## 2. Child protection – legal, policy framework and procedures in place

### 2.1. Responsibilities of child protection authorities

#### 2.1.1. Individual children, including unaccompanied and separated children

In **Bulgaria**, the difference in authorities' involvement and oversight depends on whether the child is considered unaccompanied or separated. For unaccompanied and separated children, there is a special coordination mechanism, which defines the roles and responsibilities of child protection authorities, the interaction and cooperation between them, and the procedures for handling individual cases.<sup>7</sup> The mechanism should apply in all cases of (1) children seeking and/or granted international or temporary protection who are not accompanied by a parent or other adult responsible for them under Bulgarian law, (2) unaccompanied children who have been refused international protection or have not applied for international or temporary protection, (3) children who have crossed the border with a parent and have been subsequently abandoned or separated from that parent, or who have crossed the border without their parents but are accompanied by another adult responsible for them under Bulgarian law, who continues to care for them (separated children), and (4) children of

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<sup>7</sup> Bulgaria, Ministry of Labour and Social Policy (*Министерство на труда и социалната политика*) (2022), Coordination Mechanism for Interaction between Institutions and Organisations in Cases of Unaccompanied or Separated Alien Children on the Territory of the Republic of Bulgaria, including Children Seeking and/or Granted International or Temporary Protection (*Координационен механизъм за взаимодействие между институциите и организацияте при случаи на непридружени деца или разделени от семействата си деца чужденци, намиращи се на територията на република България, включително децата, търсещи и/или получили международна или временна закрила*), 18 April 2022.

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third-country nationals who were born in Bulgaria and abandoned by their parents.<sup>8</sup> In practice, however, the mechanism is triggered only in cases where the adults travelling with the children agree to a child protection measure being applied to them. In all other cases, the children remain with the adults with whom they have arrived and the mechanism is not triggered.<sup>9</sup>

In **Bulgaria**, the coordination mechanism stipulates that if an unaccompanied or a separated child is identified, either at the border or within the territory of the country, the authorities immediately notify the local Social Assistance Directorate (SAD) (*Дирекция „Социално подпомагане“*, ДСП) responsible for the area where the child is located. The SAD registers the case and prepares a social report, which includes an assessment whether the accompanying adult is capable of taking adequate care of the child and whether it is in the child's best interest to be placed together with that person. When preparing the social report, the SAD can ask the police and/or the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето*, ДАЗД) to assist in collecting additional information relevant to the case. In the event that it is in the best interest of the child to be separated from their accompanying adult, the SAD jointly with the local mayor or another representative of the local administration must place the child in a social or integrated health-and-social service for residential care. Within one month following the placement of the child in a such a service, the SAD must ask the court to confirm the imposed measure. Once the child is placed in a social service, the SAD together with the staff of the social service and all other relevant public authorities and civil society organisations undertake measures for providing the child with access to education, healthcare and other services.<sup>10</sup>

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<sup>8</sup> Bulgaria, Ministry of Labour and Social Policy (*Министерство на труда и социалната политика*) (2022), Coordination Mechanism for Interaction between Institutions and Organisations in Cases of Unaccompanied or Separated Alien Children on the Territory of the Republic of Bulgaria, including Children Seeking and/or Granted International or Temporary Protection ([Координационен механизъм за взаимодействие между институциите и организациите при случаи на непридружени деца или разделени от семействата си деца чужденци, намиращи се на територията на република България, включително децата, търсещи и/или получили международна или временна закрила](#)), 18 April 2022, Section II.

<sup>9</sup> Bulgaria, Social Assistance Agency (*Агенция за социално подпомагане*) (2023), Letter 04-00-0948-1/05.06.2023 to the Center for the Study of Democracy, 5 June 2023.

<sup>10</sup> Bulgaria, Ministry of Labour and Social Policy (*Министерство на труда и социалната политика*) (2022), Coordination Mechanism for Interaction between Institutions and Organisations in Cases of Unaccompanied or Separated Alien Children on the Territory of the Republic of Bulgaria, including Children Seeking and/or Granted International or



In **Bulgaria**, the local Social Assistance Directorate (SAD) (*Дирекция „Социално подпомагане“*, ДСП) and the mayor of the municipality are obliged to monitor all cases of unaccompanied children living on their territory. In the presence of new circumstances, the SAD can re-assess the case and explore new possibilities of reunification of the child with their family, return to the country of origin, etc.<sup>11</sup>

In **Bulgaria**, in practice, in the vast majority of cases, unaccompanied children arriving from Ukraine are not travelling alone and are accompanied by an adult (a family member or another person the child knows), to whom the child has been entrusted by a parent or guardian. These persons usually present a power of attorney by the parent or guardian or, in the absence of a power of attorney, fill in and sign a declaration at the border that they will take responsibility and care for the child.<sup>12</sup>

In **Bulgaria**, according to the civil society organisation National Network for Children (NNC) (*Национална мрежа за децата*, НМД), the majority of children arriving from Ukraine with an adult, regardless of their relationship, are registered as unaccompanied but practically treated as accompanied, because the accompanying persons (relatives or other close persons) refuse to consent to the child being placed in a social service as provided by the child protection legislation. This practice is tolerated by the authorities partly due to the inability of the system to accommodate and provide adequate support to the huge number of children who came to the country in

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Temporary Protection ([\*Координационен механизъм за взаимодействие между институциите и организациите при случаи на непридружени деца или разделени от семействата си деца чужденци, намиращи се на територията на република България, включително децата, търсещи и/или получили международна или временна закрила\*](#)), 18 April 2022, Annex 1 and Annex 3.

<sup>11</sup> Bulgaria, Ministry of Labour and Social Policy (*Министерство на труда и социалната политика*) (2022), Coordination Mechanism for Interaction between Institutions and Organisations in Cases of Unaccompanied or Separated Alien Children on the Territory of the Republic of Bulgaria, including Children Seeking and/or Granted International or Temporary Protection ([\*Координационен механизъм за взаимодействие между институциите и организациите при случаи на непридружени деца или разделени от семействата си деца чужденци, намиращи се на територията на република България, включително децата, търсещи и/или получили международна или временна закрила\*](#)), 18 April 2022, Annex 1 and Annex 3.

<sup>12</sup> For more information on identifying and verifying accompanying adults, including the template declaration for taking responsibility and care, see the information for unaccompanied children on the [National Portal of Information and Mutual Assistance for People Affected by the War in Ukraine](#).

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a very short time.<sup>13</sup> According to the Social Assistance Agency (SAA) (*Агенция за социално подпомагане*, АСП) there has been no change in this practice since the beginning of the war and all cases of unaccompanied children continue to be handled in the same way, often without triggering the coordination mechanisms and child protection measures envisaged by it.<sup>14</sup>

In **Bulgaria**, children not travelling with any adult who is capable and willing to take care of them are also predominantly accommodated with families or persons from Ukraine (relatives or other persons the child knows). Similarly to unaccompanied children travelling with an adult, this is done by applying the protection measure known as “accommodation outside the family”, which is one of the measures for children at risk provided for by Child Protection Act (*Закон за закрила на детето*).<sup>15</sup> According to the civil society organisation National Network for Children (NNC) (*Национална мрежа за децата*, НМД), in the beginning of the crisis, there were a couple of isolated cases of placing unaccompanied children in social services, but this approach was quickly abandoned as ineffective.<sup>16</sup>

In **Bulgaria**, the accommodation of unaccompanied children with the adults with whom they are travelling is a practice applied only to children displaced from Ukraine. For unaccompanied children coming from other countries, the authorities apply the coordination mechanism and the child protection measures laid down in the Child Protection Act (*Закон за закрила на детето*).

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<sup>13</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care? (Бележник 2023: Какъв е средният успех на държавата в грижата за децата?)*, 31 May 2023, p. 39.

<sup>14</sup> Bulgaria, Social Assistance Agency (*Агенция за социално подпомагане*) (2023), Letter 04-00-0948-1/05.06.2023 to the Center for the Study of Democracy, 5 June 2023.

<sup>15</sup> For more information on identifying and accommodating unaccompanied children, see the information for unaccompanied children on the [National Portal of Information and Mutual Assistance for People Affected by the War in Ukraine](#).

<sup>16</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care? (Бележник 2023: Какъв е средният успех на държавата в грижата за децата?)*, 31 May 2023, p. 40.

## 2.1.2. Children evacuated from Ukrainian institutions

In **Bulgaria**, the public authorities have no information about any Ukrainian children displaced in Bulgaria, who have been evacuated from Ukrainian institutions.<sup>17</sup>

## 2.2. Safeguards and measures addressing risk of violent crimes against children fleeing Ukraine

### 2.2.1. Safeguards to protect and defend children from crimes

In **Bulgaria**, there are no safeguards to protect and defend children from crimes that specifically target children displaced from Ukraine. The general safeguards that apply to all children also apply to children from Ukraine.

In **Bulgaria**, according to the Child Protection Act (*Закон за закрила на детето*), all children who are in danger of harm to their physical, mental, moral, intellectual or social development are considered children at risk. As such, they can benefit from the child protection measures laid down in the law.<sup>18</sup> One of these measures, specifically aimed at children in danger of becoming victims of crime, is police protection. Police protection is an emergency measure that is taken when a child is a victim of a crime, when there is an imminent danger to the child's life or health, or when the child is lost, helpless or left unattended.<sup>19</sup> Police protection can last for 48 hours and includes placing the child in special premises not allowing contact with persons who may harm them, placing the child in social services for residential care and providing, where

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<sup>17</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>18</sup> Bulgaria, Child Protection Act (*Закон за закрила на детето*), 13 June 2000, last amended 5 August 2022, Additional Provisions, § 1(11).

<sup>19</sup> Bulgaria, Child Protection Act (*Закон за закрила на детето*), 13 June 2000, last amended 5 August 2022, Art. 38.

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necessary, physical security, or returning the child to their parents or caregivers.<sup>20</sup> More detailed rules governing the application of police protection are laid down in a special regulation issued by the Ministry of the Interior (Moi) (*Министерство на вътрешните работи*, МВР).<sup>21</sup>

In **Bulgaria**, a measure specifically aimed to protect and defend children from violence, which also applies to children from Ukraine, is the coordination mechanism in cases of violence against children laid down in the Child Protection Act (*Закон за закрила на детето*). The mechanism applies when a child is identified as being at risk of violence and exploitation or as a victim of violence or exploitation. According to the mechanism, the social worker from the Child Protection Unit (CPU) (*Отдел „Закрила на детето“*, ОЗД) of the respective Social Assistance Directorate (SAD) (*Дирекция „Социално подпомагане“*, ДСП), who is appointed to lead the case, convenes, within 24 hours, a multidisciplinary team to handle the case. The team includes, as a minimum, a representative of the police, the regional prosecutor's office and the municipality. The team can include also representatives of other institutions such as the regional health inspectorate, the child's general practitioner or the hospital, which reported the case, the regional education department, the child's school, kindergarten or other educational institution, and the service provider (if the child is a user of a state-funded social service). The multidisciplinary team elaborates an action plan for protecting the child (including health, social and educational services for violence prevention or child recovery) and handles the case following this plan until its completion.<sup>22</sup> More detailed rules and guidelines on the operation of the coordination mechanism are laid down in an agreement signed between the main authorities involved in its implementation.<sup>23</sup>

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<sup>20</sup> Bulgaria, Child Protection Act ([Закон за закрила на детето](#)), 13 June 2000, last amended 5 August 2022, Art. 39(1).

<sup>21</sup> Bulgaria, Ministry of the Interior (*Министерство на вътрешните работи*), Regulation No I-51 of 12 March 2001 on the conditions and procedures for granting police protection to children ([Наредба № I-51 от 12 март 2001 г. за условията и реда за предоставяне на полицейска закрила на детето](#)), 28 March 2001, last amended 1 August 2017.

<sup>22</sup> Bulgaria, Child Protection Act ([Закон за закрила на детето](#)), 13 June 2000, last amended 5 August 2022, Art. 36d and Art. 36e.

<sup>23</sup> Bulgaria, Ministry of Labour and Social Policy (*Министерство на труда и социалната политика*), Ministry of the Interior (*Министерство на вътрешните работи*), Ministry of Education, Youth and Science (*Министерство на образованието, младежта и науката*), Ministry of Justice (*Министерство на правосъдието*), Ministry of Foreign Affairs (*Министерство на външните работи*), Ministry of Culture (*Министерство на*

In **Bulgaria**, measures to protect children from violence are also envisaged in the National Programme for the Prevention of Child Violence and Abuse 2023-2026 (*Национална програма за превенция на насилието и злоупотреба с деца 2023 – 2026 г.*)<sup>24</sup> and the Action Plan for its implementation.<sup>25</sup> Most of these measures are aimed to protect all children irrespective of their nationality or country of origin, but some are specifically targeted at migrant children (e.g., development and dissemination of educational materials on children’s rights explaining the Bulgarian child protection system, adapted for children and translated in the respective languages).<sup>26</sup>

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културата), Ministry of Health (*Министерство на здравеопазването*), State Agency for Child Protection (*Държавна агенция за закрила на детето*), Social Assistance Agency (*Агенция за социално подпомагане*), National Association of Municipalities in the Republic of Bulgaria (*Национално сдружение на общините в Република България*) (2010), Cooperation and Coordination Agreement on the Work of the Territorial Structures of Child Protection Authorities in Cases of Children Victims of Violence or at Risk of Violence and in Case of a Crisis Intervention (*Споразумение за сътрудничество и координиране на работата на териториалните структури на органите за закрила на детето при случаи на деца, жертви на насилие или в риск от насилие и при кризисна интервенция*), Annex 1: Obligations of the protection authorities at central and local level and the other entities involved under this Coordination Mechanism for interaction in cases of children victims or at risk of violence and for interaction in crisis intervention (*Приложение 1: Задължения на органите за закрила на централно и местно ниво и останалите ангажирани субекти по настоящия Координационен механизъм за взаимодействие при работа в случаи на деца, жертви или в риск от насилие и за взаимодействие при кризисна интервенция*), Annex 2a Multidisciplinary mechanism for interaction in case of a report of a child victim of violence or at risk of violence (*Приложение 2а: Мултидисциплинарен механизъм за взаимодействие при сигнал за дете, жертва на насилие или в риск от насилие*), Annex 2b Crisis intervention procedure (*Процедура при кризисна интервенция*), 15 March 2010.

<sup>24</sup> Bulgaria, National Programme for the Prevention of Child Violence and Abuse 2023-2026 (*Национална програма за превенция на насилието и злоупотреба с деца 2023 – 2026 г.*), 23 January 2023.

<sup>25</sup> Bulgaria, Council of Ministers (*Министерски съвет*), Action Plan for the Implementation of the National Programme for the Prevention of Child Violence and Abuse 2023-2026 (*План за действие за изпълнение на Националната програма за превенция на насилието и злоупотребата с деца 2023 – 2026 г.*), 23 January 2023.

<sup>26</sup> Bulgaria, Council of Ministers (*Министерски съвет*), Action Plan for the Implementation of the National Programme for the Prevention of Child Violence and Abuse 2023-2026 (*План за действие за изпълнение на Националната програма за превенция на насилието и злоупотребата с деца 2023 – 2026 г.*), 23 January 2023.

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In **Bulgaria**, cases of children at risk of becoming victims of crime can be reported through the National Children’s Hotline 116 111. The hotline is operated jointly by the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*) and the Social Assistance Agency (SAA) (*Агенция за социално подпомагане, АСП*). The service is available 24/7 and is free of charge.<sup>27</sup> However, according to the civil society organisation National Network for Children (NNC) (*Национална мрежа за децата, НМД*), children who do not speak Bulgarian, Russian or English are practically unable to use the hotline because the operators speak only these three languages.<sup>28</sup>

In **Bulgaria**, the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*) initiated a campaign to prevent unaccompanied Ukrainian children from crime. Throughout 2022, social workers and police officers visited the places, where unaccompanied children from Ukraine were placed together with the adults taking care of them, and explained to the children the dangers of becoming victims of violence and the risks of getting involved in human trafficking or other criminal activity.<sup>29</sup>

In **Bulgaria**, as a measure to prevent Ukrainian children from being involved in human trafficking, the Ministry of the Interior (MoI) (*Министерство на вътрешните работи, МВР*) has instructed police officers working at border checkpoints to collect and record data on all adults travelling with unaccompanied Ukrainian children (children who are not travelling with their parents or guardians). The collected data includes the name of the person, their contact telephone number and the address where they will reside with the child, the name and contact telephone number of the person to whom the child will be handed over, the name, telephone number and address or location of the children’s parent(s), the travel route, etc.<sup>30</sup>

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<sup>27</sup> For more information, see the [website](#) of the National Children’s Hotline.

<sup>28</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care? (Бележник 2023: Какъв е средният успех на държавата в грижата за децата?)*, 31 May 2023, p. 40.

<sup>29</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>30</sup> Bulgaria, Ministry of the Interior (*Министерство на вътрешните работи*) (2023), Letter No 812100-10399-1/16.06.2023 to the Center for the Study of Democracy, 16 June 2023.

## 2.2.2. Support for children victims of crimes

In **Bulgaria**, according to the Child Protection Act (*Закон за закрила на детето*), all children who are victims of abuse, violence, exploitation or any other inhuman or degrading treatment or punishment, whether within or outside their family, are considered children at risk and as such are subject to the child protection measures laid down in the law.<sup>31</sup> These measures include, among others, police protection<sup>32</sup> and implementation of the special coordination mechanism in cases of violence against children,<sup>33</sup> both described in detail in the previous subsection on safeguards to protect and defend children from crimes. The measures apply to all children regardless of their nationality, including children displaced from Ukraine.

In **Bulgaria**, the support services for victims of crime funded by the state are the same for all victims regardless of their age. According to the Support and Compensation to Victims of Crime Act (*Закон за подпомагане и компенсация на пострадали от престъпления*) these services include medical care for emergency conditions, psychological consultation and assistance, free legal aid, and practical assistance.<sup>34</sup>

In **Bulgaria**, the law defines all child victims, regardless of their nationality, as victims with special protection needs.<sup>35</sup> As such, child victims, including children from Ukraine, have additional procedural rights if they are involved as witnesses in the criminal proceedings against the offender.

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<sup>31</sup> Bulgaria, Child Protection Act (*Закон за закрила на детето*), 13 June 2000, last amended 5 August 2022, Additional Provisions, § 1(11).

<sup>32</sup> Bulgaria, Child Protection Act (*Закон за закрила на детето*), 13 June 2000, last amended 5 August 2022, Art. 37 – Art. 43.

<sup>33</sup> Bulgaria, Child Protection Act (*Закон за закрила на детето*), 13 June 2000, last amended 5 August 2022, Art. 36d – Art. 36e.

<sup>34</sup> Bulgaria, Support and Compensation to Victims of Crime Act (*Закон за подпомагане и компенсация на пострадали от престъпления*), 22 December 2006, last amended 2 June 2023, Art. 8.

<sup>35</sup> Bulgaria, Support and Compensation to Victims of Crime Act (*Закон за подпомагане и компенсация на пострадали от престъпления*), 22 December 2006, last amended 2 June 2023, Art. 7a.

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## 2.3. Guardianship/legal representation arrangements for unaccompanied and separated children fleeing Ukraine

### 2.3.1. Arrived unaccompanied

In **Bulgaria**, all children arriving from Ukraine without their parent(s) or guardian(s) are registered as unaccompanied.<sup>36</sup> However, the representation arrangements are not the same for all unaccompanied children and depend on the persons they are travelling with and their consent to protection measures being taken for the children. As a rule, unaccompanied Ukrainian children are accommodated with other adult persons from Ukraine (other family members or close persons the child knows or has travelled with). This is done by applying the measure “accommodation outside the family”, which is one of the protection measures for children at risk envisaged in the child protection legislation.<sup>37</sup> According to Bulgarian law, in all cases in which this measure is imposed, the person with whom the child is accommodated is given the right to make decisions and take action to safeguard the child’s life and health, and to take legal action to protect the child’s rights relating to their health, education and civil status.<sup>38</sup> For this category of children, other legal representation arrangements are not made. In practice, however, according to the Social Assistance Agency (SAA) (*Агенция за социално подпомагане*, АСП), there are many cases where the persons travelling with the children do not consent to this measure being applied, mainly because they do not feel comfortable getting involved in administrative and judicial procedures in a foreign country. Such persons are allowed to continue to live with the children with whom they are travelling, but without being able to take any action on their behalf.<sup>39</sup>

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<sup>36</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>37</sup> For more information on identifying and accommodating unaccompanied children, see the information for unaccompanied children on the [National Portal of Information and Mutual Assistance for People Affected by the War in Ukraine](#).

<sup>38</sup> Bulgaria, Family Code (*Семеен кодекс*), 23 June 2009, last amended 4 December 2020, Art. 137.

<sup>39</sup> Bulgaria, Social Assistance Agency (*Агенция за социално подпомагане*) (2023), Letter 04-00-0948-1/05.06.2023 to the Center for the Study of Democracy, 5 June 2023.



In **Bulgaria**, according to the Social Assistance Agency (SAA) (*Агенция за социално подпомагане*, АСП), there is a gap in the legislation, which leads to different representation arrangements for children seeking or granted international protection and those with temporary protection. According to the Asylum and Refugees Act (*Закон за убежището и бежанците*), children seeking or granted international protection are represented by a lawyer registered in the legal aid register of the National Legal Aid Bureau (NLAB) (*Национално бюро за правна помощ*, НБПП).<sup>40</sup> This rule, however, does not apply to unaccompanied children granted temporary protection.<sup>41</sup>

In **Bulgaria**, by law, guardianship arrangements can be made only for children whose parents are unknown, deceased or deprived of parental rights.<sup>42</sup> For such children, the mayor of the municipality, where the child lives, appoints a guardian following the rules and procedures laid down in the Family Code (*Семеен кодекс*). If the child is accommodated in a social service or integrated health-and-social service for residential care, the manager of the social service is considered by law to be guardian of the child.<sup>43</sup> Unaccompanied children, whose parents are not unknown, deceased or deprived of parental rights, are considered as children whose parental rights continue to be exercised by their parents or guardians in Ukraine and therefore cannot have a guardian appointed under Bulgarian law.

### 2.3.2. Arrived without parents, but with other family members, neighbours or family friends

In **Bulgaria**, children arriving with an adult, who is able and willing to take care of them, are registered as unaccompanied and accommodated with that person, either as a protection measure in accordance with the Child Protection Act (*Закон за закрила*

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<sup>40</sup> Bulgaria, Asylum and Refugees Act (*Закон за убежището и бежанците*), 31 May 2022, last amended 26 April 2022, Art. 25.

<sup>41</sup> Bulgaria, Social Assistance Agency (*Агенция за социално подпомагане*) (2023), Letter 04-00-0948-1/05.06.2023 to the Center for the Study of Democracy, 5 June 2023.

<sup>42</sup> Bulgaria, Family Code (*Семеен кодекс*), 23 June 2009, last amended 4 December 2020, Art. 153.

<sup>43</sup> Bulgaria, Family Code (*Семеен кодекс*), 23 June 2009, last amended 4 December 2020, Art. 173.

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на детето) or not, if the adult does not consent.<sup>44</sup> According to the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*), the total number of such children since the start of the war until 9 June 2023 is 589 children.<sup>45</sup> The adult person must present a power of attorney by a parent or guardian. In the absence of a power of attorney, the accompanying adult must sign a declaration that they will take responsibility and care for the child.<sup>46</sup> The local Social Assistance Directorate (SAD) (*Дирекция „Социално подпомагане“, ДСП*) and the mayor of the municipality are obliged to monitor all cases of unaccompanied children living on their territory.<sup>47</sup> No particular difficulties in recognising the power of attorneys or the legal guardianship established in Ukraine have been identified. In all cases, where the child is accommodated with the adult as a protection measure, in accordance with the provisions of the Family Code (*Семеен кодекс*), that person, can make decisions and take action to safeguard the child’s life and health, and can take the necessary legal action to protect the child’s personal rights relating to their health, education and civil status. In all cases where the adult person does not consent to a protection measure being imposed, the child remains practically unrepresented. No other guardianship or legal representation arrangements are made.<sup>48</sup>

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<sup>44</sup> For more information on identifying and accommodating unaccompanied children, see the information for unaccompanied children on the [National Portal of Information and Mutual Assistance for People Affected by the War in Ukraine](#).

<sup>45</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>46</sup> For more information on identifying and verifying accompanying adults, including the template declaration for taking responsibility and care, see the information for unaccompanied children on the [National Portal of Information and Mutual Assistance for People Affected by the War in Ukraine](#).

<sup>47</sup> Bulgaria, Ministry of Labour and Social Policy (*Министерство на труда и социалната политика*) (2022), Coordination Mechanism for Interaction between Institutions and Organisations in Cases of Unaccompanied or Separated Alien Children on the Territory of the Republic of Bulgaria, including Children Seeking and/or Granted International or Temporary Protection ([Координационен механизъм за взаимодействие между институциите и организациите при случаи на непридружени деца или разделени от семействата си деца чужденци, намиращи се на територията на република България, включително децата, търсещи и/или получили международна или временна закрила](#)), 18 April 2022, Annex 1 and Annex 3.

<sup>48</sup> Bulgaria, Family Code (*Семеен кодекс*), 23 June 2009, last amended 4 December 2020, Art. 137.

### **2.3.3. Arrived within a group, from Ukrainian institution or foster carers (with or without an appointed legal guardian)**

In **Bulgaria**, there is no information about any children arriving to Bulgaria from Ukrainian institutions or foster care. In theory, such children should be registered as unaccompanied and accommodated with the adult persons with whom they travel, if these persons are able and willing to take care of them, and if they present a power of attorney by a parent or guardian or a declaration that they will take responsibility and care for the child.<sup>49</sup> In such cases, in accordance with the provisions of the Family Code (*Семейн кодекс*), the person with whom the child is accommodated, is authorised to make decisions and take action to safeguard the child's life and health, and take the necessary legal action to protect the child's personal rights relating to their health, education and civil status.<sup>50</sup>

### **2.3.4. Arrived within a group, through private initiatives, such as football clubs (with or without an appointed legal guardian)**

In **Bulgaria**, children arriving through private initiatives are registered as unaccompanied and are accommodated with the adult persons with whom they travel. These persons must be able and willing to take care of the children and must either have a power of attorney by the children's parents or guardians or sign a declaration that they will take responsibility and care for them.<sup>51</sup> In such cases, in accordance with Bulgarian law, the persons with whom the children are accommodated are given the right to make decisions and take action to safeguard the children's life and health, and to take legal action to protect the children's rights relating to their health, education

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<sup>49</sup> For more information on identifying and verifying accompanying adults, including the template declaration for taking responsibility and care, see the information for unaccompanied children on the [National Portal of Information and Mutual Assistance for People Affected by the War in Ukraine](#).

<sup>50</sup> Bulgaria, Family Code (*Семейн кодекс*), 23 June 2009, last amended 4 December 2020, Art. 137.

<sup>51</sup> For more information on identifying and verifying accompanying adults, including the template declaration for taking responsibility and care, see the information for unaccompanied children on the [National Portal of Information and Mutual Assistance for People Affected by the War in Ukraine](#).

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and civil status.<sup>52</sup> No other guardianship or legal representation arrangements are made. In practice, according to the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*), the majority of children arriving within groups through private initiatives are members of sport clubs travelling with their coaches, who have a notarised power of attorney from their parents. However, data on the exact number of these children is not collected.<sup>53</sup>

## 2.4. Placement of unaccompanied and separated children fleeing from Ukraine

**Table 3 – Placement of unaccompanied and separated children**

Type of placement	Number of children	Details
With adult relatives	N/A	
With a foster family	0	
With person who looked after the child when fleeing	N/A	
In reception centres for unaccompanied children (all nationalities)	0	
In reception centres for children fleeing Ukraine	0	
Other placement	N/A	

Source: State Agency for Child Protection (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>52</sup> Bulgaria, Family Code (*Семеен кодекс*), 23 June 2009, last amended 4 December 2020, Art. 137.

<sup>53</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

In **Bulgaria**, the child protection authorities do not collect statistical data on the placement and location of unaccompanied children arriving from Ukraine.<sup>54</sup> In practice, the vast majority of children registered as unaccompanied, including separated children, are accommodated with adult relatives or with the persons with whom they travel, if these persons are able and willing to take care of the children, and have a power of attorney by the children's parents or guardians or, in the absence of a power of attorney, sign a declaration that they will take responsibility and care for them.<sup>55</sup> According to the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*), there are no children from Ukraine placed in reception centres, foster families or residential care settings.<sup>56</sup> According to the civil society organisation National Network for Children (NNC) (*Национална мрежа за децата, НМД*), in the beginning of the crisis, there were a couple of isolated cases of placing unaccompanied children in residential social services, but this approach was quickly abandoned as ineffective.<sup>57</sup>

In **Bulgaria**, no particular issues have been reported in relation to the living conditions of children arriving from Ukraine. Overall, the children share the same living conditions as the adult persons with whom they are accommodated (rented accommodation or accommodation provided by the government).

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<sup>54</sup> Bulgaria, State Agency for Refugees (*Държавна агенция за бежанците*) (2023), Letter No ЦУ-14-152-1/08.06.2023 to the Center for the Study of Democracy, 8 June 2023.

<sup>55</sup> For more information on identifying and verifying accompanying adults, including the template declaration for taking responsibility and care, see the information for unaccompanied children on the [National Portal of Information and Mutual Assistance for People Affected by the War in Ukraine](#).

<sup>56</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>57</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care? (Бележник 2023: Какъв е средният успех на държавата в грижата за децата?)*, 31 May 2023, p. 40.

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## 2.5. Children evacuated from Ukrainian institutions

### 2.5.1. Institutional placements

In **Bulgaria**, there are no premises specifically designated for hosting children evacuated from Ukrainian institutions. Moreover, according to the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*), there is no information that any of the children displaced in Bulgaria have been evacuated from such institutions.<sup>58</sup>

### 2.5.2. Alternative care

In **Bulgaria**, according to the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*), there are no children displaced from Ukraine, who have been evacuated from institutions. For this reason, there are no specific efforts or initiatives to place such children in alternative community-based settings.<sup>59</sup>

### 2.5.3. Safeguards for children placed in institutional care settings

In **Bulgaria**, according to the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*), there are no children displaced from Ukraine, who are placed in institutional care settings. For this reason, there are no specific safeguards in place for such children.<sup>60</sup>

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<sup>58</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>59</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>60</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

## 2.5.4. Access to local services and support

In **Bulgaria**, according to the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*), there are no children displaced from Ukraine, who are placed in residential care settings. For this reason, there are no specific measures in place to integrate such children in the local community.<sup>61</sup> According to the civil society organisation National Network for Children (NNC) (*Национална мрежа за децата, НМД*), in the beginning of the crisis, there were a couple of isolated cases of placing unaccompanied children in residential social services, but this approach was quickly abandoned as ineffective.<sup>62</sup>

## 2.6. Child-friendly information and means to ensure participation of children from Ukraine

### 2.6.1. Child friendly information

In **Bulgaria**, there are only a few initiatives to provide information to children from Ukraine in a child-friendly manner about their rights.

In **Bulgaria**, the State Agency for Child Protection (SACP) (*Държавна агенция за закрила на детето, ДАЗД*) conducted an awareness campaign to provide information to children from Ukraine about their rights. Experts from the SACP visited the places accommodating children from Ukraine and met with the children and their parents. Posters, leaflets and other information materials in English and Ukrainian were also developed and distributed to the places accommodating Ukrainian children. The materials are adapted for children and include information about their rights,

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<sup>61</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023.

<sup>62</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care? (Бележник 2023: Какъв е средният успех на държавата в грижата за децата?)*, 31 May 2023, p. 40.

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safety, complaint mechanisms and the National Children’s Helpline 116 111.<sup>63</sup> The campaign is part of an international project implemented by Child Helpline International in partnership with UNICEF European and Central Asian Regional Office.<sup>64</sup>

In **Bulgaria**, information about safety risks, complaint mechanisms and available protection services is also provided through the Digital Blue Dot platform, developed by UNICEF and UNHCR. The platform, which complements the six physical Blue Dot Safe Spaces in Bulgaria, is aimed to improve access to information on children’s rights, protection and services.<sup>65</sup>

## 2.6.2. Child participation

In **Bulgaria**, there are no initiatives by public authorities specifically aimed to ensure and facilitate child participation. There is no information on consulting children on a particular programme, facilitating their inclusion in children and school councils, or any other similar activities. The only initiatives aimed at facilitating civic participation of children from Ukraine have been conducted by UNICEF.<sup>66</sup>

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<sup>63</sup> Bulgaria, State Agency for Child Protection (*Държавна агенция за закрила на детето*) (2023), Letter No 04-21-59-1/09.06.2023 to the Center for the Study of Democracy, 9 June 2023. For more information about the campaign, see the press releases of the State Agency for Child Protection for the visits in [Varna](#) and [Ruse](#).

<sup>64</sup> For more information about the project, see the [website](#) of Child Helpline International.

<sup>65</sup> For more information about the Digital Blue Dot and the information it provides on Bulgaria, see the platform’s [website](#).

<sup>66</sup> For example, see UNICEF Bulgaria (2023), [‘The Duke of Edinburgh’s International Award and UNICEF are launching a joint program for youth from Ukraine and Bulgaria’](#), press release, 28 March 2023.



## 3. Access to social rights

### 3.1. Access to health care

#### 3.1.1. Scope of medical care for children fleeing Ukraine

**Table 4 – Scope of medical care for children**

Scope of medical care for children	Y/N	Reference / details
Only emergency care/essential treatment of illnesses (Article 13.2 TPD)	Y	Act on the Implementation of Provisions of the 2022 State Budget Act, the 2022 Budget of the State Social Security Act and the 2022 Budget of the National Health Insurance Fund Act <sup>67</sup>  National Framework Contract <sup>68</sup>
Complete medical check -up / health screening	Y	Act on the Implementation of Provisions of the 2022 State Budget

<sup>67</sup> Bulgaria, Act on the Implementation of Provisions of the 2022 State Budget Act, the 2022 Budget of the State Social Security Act and the 2022 Budget of the National Health Insurance Fund Act ([Закон за прилагане на разпоредби на Закона за държавния бюджет на Република България за 2022 г., Закона за бюджета на държавното обществено осигуряване за 2022 г. и Закона за бюджета на Националната здравноосигурителна каса за 2022 г.](#)), 23 December 2022.

<sup>68</sup> Bulgaria, National Framework Contract No RD-NS-01-4 of 23 December 2019 for the medical activities between the National Health Insurance Fund and the Bulgarian Medical Association for 2020 – 2022 ([Национален рамков договор № РД-НС-01-4 от 23 декември 2019 г. за медицинските дейности между Националната здравноосигурителна каса и Българския лекарски съюз за 2020 – 2022 г.](#)), 24 January 2020.

		Act, the 2022 Budget of the State Social Security Act and the 2022 Budget of the National Health Insurance Fund Act <sup>69</sup>  National Framework Contract <sup>70</sup>
Mental health screening (PTSD, depression, anxiety)	N	Mental health screening is not included in the social insurance package and is not offered as part of the health services covered by the state. Children can receive medical care for mental conditions free of charge if they are referred to such services by their general practitioner.
Vaccinations for children	Y	Act on the Implementation of Provisions of the 2022 State Budget Act, the 2022 Budget of the State Social Security Act and the 2022 Budget of the

<sup>69</sup> Bulgaria, Act on the Implementation of Provisions of the 2022 State Budget Act, the 2022 Budget of the State Social Security Act and the 2022 Budget of the National Health Insurance Fund Act ([Закон за прилагане на разпоредби на Закона за държавния бюджет на Република България за 2022 г., Закона за бюджета на държавното обществено осигуряване за 2022 г. и Закона за бюджета на Националната здравноосигурителна каса за 2022 г.](#)), 23 December 2022.

<sup>70</sup> Bulgaria, National Framework Contract No RD-NS-01-4 of 23 December 2019 for the medical activities between the National Health Insurance Fund and the Bulgarian Medical Association for 2020 – 2022 ([Национален рамков договор № РД-НС-01-4 от 23 декември 2019 г. за медицинските дейности между Националната здравноосигурителна каса и Българския лекарски съюз за 2020 – 2022 г.](#)), 24 January 2020.

		National Health Insurance Fund Act <sup>71</sup>  National Framework Contract <sup>72</sup>
Mental health / psychosocial support	Y	All vulnerable persons, including those with mental disorders and persons who have suffered torture, rape or other serious form of mental, physical or sexual abuse, have the same health insurance rights as Bulgarian citizens. <sup>73</sup>
Children with disabilities and those with chronic illnesses have access to the medical care needed	Y	Act on the Implementation of Provisions of the 2022 State Budget Act, the 2022 Budget of the State Social Security Act and the 2022 Budget of the National Health Insurance Fund Act <sup>74</sup>

<sup>71</sup> Bulgaria, Act on the Implementation of Provisions of the 2022 State Budget Act, the 2022 Budget of the State Social Security Act and the 2022 Budget of the National Health Insurance Fund Act ([Закон за прилагане на разпоредби на Закона за държавния бюджет на Република България за 2022 г., Закона за бюджета на държавното обществено осигуряване за 2022 г. и Закона за бюджета на Националната здравноосигурителна каса за 2022 г.](#)), 23 December 2022.

<sup>72</sup> Bulgaria, National Framework Contract No RD-NS-01-4 of 23 December 2019 for the medical activities between the National Health Insurance Fund and the Bulgarian Medical Association for 2020 – 2022 ([Национален рамков договор № РД-НС-01-4 от 23 декември 2019 г. за медицинските дейности между Националната здравноосигурителна каса и Българския лекарски съюз за 2020 – 2022 г.](#)), 24 January 2020.

<sup>73</sup> For more information, see the [website](#) of the Sofia City Health Inspectorate.

<sup>74</sup> Bulgaria, Act on the Implementation of Provisions of the 2022 State Budget Act, the 2022 Budget of the State Social Security Act and the 2022 Budget of the National Health Insurance Fund Act ([Закон за прилагане на разпоредби на Закона за държавния бюджет на Република България за 2022 г., Закона за бюджета на държавното обществено осигуряване за 2022 г. и Закона за бюджета на Националната здравноосигурителна каса за 2022 г.](#)), 23 December 2022.

	National Framework Contract <sup>75</sup>
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Source: Ministry of Health (2023), Letter No 04-21-68/07.06.2023 to the Center for the Study of Democracy.

In **Bulgaria**, children aged under 18 years fleeing Ukraine acquire the same rights to free medical aid and medical services as Bulgarian children from the date they register for temporary protection.<sup>76</sup> Their health insurance contributions are paid by the state for the entire period of temporary protection.<sup>77</sup> For this purpose, the State Agency for Refugees (SAR) (*Държавна агенция за бежанците*, ДАБ) send regular information to the National Revenue Agency (NRA) (*Национална агенция за приходите*, НАП) on all children entitled to free healthcare.<sup>78</sup> The World Health Organizations (WHO) notes that, despite children are entitled to free access to paediatric care and are encouraged to attend regular medical check-ups conducted by general practitioners and paediatricians, some medical interventions and medications are not fully covered. Such interventions and medications are only partially reimbursed by the National Health

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<sup>75</sup> Bulgaria, National Framework Contract No RD-NS-01-4 of 23 December 2019 for the medical activities between the National Health Insurance Fund and the Bulgarian Medical Association for 2020 – 2022 ([Национален рамков договор № РД-НС-01-4 от 23 декември 2019 г. за медицинските дейности между Националната здравноосигурителна каса и Българския лекарски съюз за 2020 – 2022 г.](#)), 24 January 2020.

<sup>76</sup> Bulgaria, Asylum and Refugees Act ([Закон за убежището и бежанците](#)), 1 December 2002, last amended 26 April 2022, Art. 39.

<sup>77</sup> Bulgaria, Council of Ministers (*Министерски съвет*), Decree No 69 of 5 May 2022 on health insurance for persons with temporary protection under Art. 1a(3) of the Asylum and Refugees Act and persons referred to in Art. 39(6)(2) and Article 40a(2) and (3a) of the Health Insurance Act ([Постановление № 69 от 5 май 2022 г. за здравно осигуряване на лицата с временна закрила по чл. 1а, ал. 3 от Закона за убежището и бежанците и на лицата по чл. 39, ал. 6, т. 2 и чл. 40а, ал. 3а от Закона за здравното осигуряване](#)), 5 May 2022.

<sup>78</sup> Bulgaria, Decree No 69 of 5 May 2022 on health insurance for persons with temporary protection under Art. 1a(3) of the Asylum and Refugees Act and persons referred to in Art. 39(6)(2) and Article 40a(2) and (3a) of the Health Insurance Act ([Постановление № 69 от 5 май 2022 г. за здравно осигуряване на лицата с временна закрила по чл. 1а, ал. 3 от Закона за убежището и бежанците и на лицата по чл. 39, ал. 6, т. 2 и чл. 40а, ал. 3а от Закона за здравното осигуряване](#)), 5 May 2022, Art. 1(6).

Insurance Fund (NHIF) (*Национална здравно-осигурителна каса, НЗОК*) and require additional payment.<sup>79</sup>

In **Bulgaria**, all persons with a valid health insurance should register with a general practitioner (GP) of their choice in order to have access to outpatient medical care.<sup>80</sup> The same applies to Ukrainian children once they obtain temporary protection status. Despite the lack of official statistics, some studies suggest that finding a GP is a serious challenge for many Ukrainian families, who rely on CSOs as the major source of support in that regard.<sup>81</sup> CSOs are also independently providing project-based access to healthcare.<sup>82</sup>

In **Bulgaria**, all children should undergo obligatory immunisations.<sup>83</sup> Moreover, they must have all necessary immunisations for their age to be enrolled in a licensed school or kindergarten.<sup>84</sup> The challenges related to the immunisation of Ukrainian children are described in Section 3.1.2.

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<sup>79</sup> World Health Organization (2023), [Report on refugee health: assessment of the Bulgarian health system's needs within the context of the crisis in Ukraine](#), Geneva, World Health Organization, 21 March 2023.

<sup>80</sup> Bulgaria, National Framework Contract No RD-NS-01-4 of 23 December 2019 for the medical activities between the National Health Insurance Fund and the Bulgarian Medical Association for 2020 – 2022 ([Национален рамков договор № РД-НС-01-4 от 23 декември 2019 г. за медицинските дейности между Националната здравноосигурителна каса и Българския лекарски съюз за 2020 – 2022 г.](#)), 24 January 2020, Art. 126.

<sup>81</sup> National Patients' Organisation (*Национална пациентска организация*) (2023), Access to healthcare for Ukrainian refugees in Bulgaria: results of a survey among Ukrainian refugees and health system representatives ([Достъп до здравеопазване за украинските бежанци в България: Резултати от проучване сред украински бежанци и представители на здравната система](#)), 22 February 2023.

<sup>82</sup> For example, see the free medical check-ups for Ukrainian citizens offered by [Astra Forum Foundation](#).

<sup>83</sup> Bulgaria, Health Act ([Закон за здравето](#)), 1 December 2005, last amended 25 January 2023, Art. 58; Bulgaria, Regulation No 15 of 12 May 2005 on the Immunisations in the Republic of Bulgaria ([Наредба № 15 от 12 май 2005 г. за имунизациите в Република България](#)), 31 May 2005, last amended 24 February 2023.

<sup>84</sup> Bulgaria, Ministry of Health (*Министерство на здравеопазването*), Regulation No 3 of 5 February 2007 on health requirements for kindergartens ([Наредба № 3 от 5 февруари 2007 г. За здравните изисквания към детските градини](#)), 16 February 2007, last amended 8 July 2022.

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In **Bulgaria**, the health authorities carried out an additional poliomyelitis screening of all children arriving from Ukraine, who were enrolled in kindergarten. The measure was undertaken due to the difference between the immunisation calendars in Bulgaria and Ukraine.<sup>85</sup>

In **Bulgaria**, despite no mental health screening is included in the health insurance package, frontline workers from social services and CSOs, as well as volunteers, are often instructed to screen the people they work with and refer them to support, if needed.<sup>86</sup> In addition, the National Centre for Public Health and Analysis (NCPHA) (*Национален център за обществено здраве и анализи, НЦОЗА*) prepared a guide for providing psychosocial support to refugees.<sup>87</sup>

In **Bulgaria**, the Bulgarian Red Cross (BRC) (*Български червен кръст, БЧК*) and the World Health Organization (WHO) initiated a joint project to facilitate the access to healthcare of people from Ukraine. The project covers additional health expenses, such as purchase of medicines, medical devices, and cost of tests and surgical interventions, and provides a medical consultant in the regions of Sofia, Varna and Burgas.<sup>88</sup>

### 3.1.2. Challenges in practical provision

In **Bulgaria**, during the first month of inflow of people from Ukraine, healthcare was provided only by doctors and health centres on a voluntary basis on their own initiative. At the end of March 2022, children and pregnant women were the first to obtain access to free healthcare at 31 health counselling centres opened in the country.<sup>89</sup> There is no data on the number of children deprived of access to health during that period.

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<sup>85</sup> For more information, see the [website](#) of the Sofia City Health Inspectorate.

<sup>86</sup> For an example of such training, see the [website](#) of IOM Bulgaria.

<sup>87</sup> Dimitrov, P. and Tsoleva, G. (eds.) (2023), Guide for providing psychosocial support to refugees (*Ръководство за психо-социална подкрепа на бежанци*), Sofia, National Centre for Public Health and Analysis, 22 May 2023.

<sup>88</sup> Bulgarian Red Cross (*Български червен кръст*) (2023), 'BRC and WHO with a joint project to support Ukrainian citizens in Bulgaria' (*БЧК и СЗО със съвместен проект за подпомагане на украинските граждани в България*), press release, 17 November 2023.

<sup>89</sup> Kachaunova, A. et al. (2023), *Human Rights in Bulgaria in 2022* (*Правата на човека в България през 2022 г.*), Sofia, Bulgarian Helsinki Committee, 16 May 2023, p. 120.

In **Bulgaria**, aligning the vaccination of Ukrainian children with the Bulgarian immunisation calendar was particularly important because having all vaccines is a mandatory requirement for enrolment in kindergartens and schools.<sup>90</sup> According to the instructions issued by the health authorities, immunisation can be proved only by presenting an official document.<sup>91</sup> However, many people fleeing the war did not bring such documents with them. According to the instructions, children for whom vaccination data is not available, are considered non-vaccinated. For such children a special vaccination procedure was initiated in line with the Bulgarian immunisation calendar.<sup>92</sup> In general, according to media reports, the doctors in Bulgaria accept different types of evidence for vaccination, including pictures of vaccination certificates.<sup>93</sup> People, who are not registered with a general practitioner, can turn to the Regional Health Inspectorates (RHI) (*Регионални здравни инспекции, РЗИ*) to receive vaccinations.<sup>94</sup> In 2022, the inspectorates provided 3,006 consultations on the health requirements for attending a kindergarten, 1,462 vaccine doses were delivered to Ukrainian children, and 208 free laboratory tests were carried out in relation to enrolling Ukrainian children in kindergartens.<sup>95</sup> Still, the World Health Organization (WHO) points out vaccine hesitancy among both the refugees and the host population.<sup>96</sup> The law envisages a fine for people who do not ensure their children are

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<sup>90</sup> Doykinski, P. and Tsvetkov, Ts. (2022), 'Children from Ukraine are immunised so they can attend kindergarten or school in our country' (*'Имунизират децата от Украйна, за да могат да посещават детска градина или училище у нас'*), Bulgarian National Television, 16 July 2022.

<sup>91</sup> For more information, see the [website](#) of the Sofia City Health Inspectorate.

<sup>92</sup> For more information, see the [website](#) of the Sofia City Health Inspectorate.

<sup>93</sup> Doykinski, P. and Tsvetkov, Ts. (2022), 'Children from Ukraine are immunised so they can attend kindergarten or school in our country' (*'Имунизират децата от Украйна, за да могат да посещават детска градина или училище у нас'*), Bulgarian National Television, 16 July 2022.

<sup>94</sup> For more information, see the [website](#) of UNHCR Bulgaria.

<sup>95</sup> Bulgaria, Ombudsman of the Republic of Bulgaria (*Омбудсман на Република България*) (2023), Annual report on the activities of the Ombudsman of the Republic of Bulgaria in 2022 (*Годишен доклад за дейността на омбудсмана на Република България през 2022 г.*), 12 April 2023, p. 333.

<sup>96</sup> World Health Organization (2023), *Report on refugee health: assessment of the Bulgarian health system's needs within the context of the crisis in Ukraine*, Geneva, World Health Organization, 21 March 2023, p. 27.

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vaccinated,<sup>97</sup> but there is no information if such fines are imposed to Ukrainian parents.

In **Bulgaria**, persons displaced from Ukraine receive support from CSOs to cover the costs for medical services not included by the health insurance package, e.g., costs for purchasing some medicines and medical appliances.<sup>98</sup> According to the Bulgarian Red Cross (BRC) (*Български червен кръст*, БЧК), some 70 % of the people coming from Ukraine suffer from chronic diseases and some 40 % of the medical activities are not covered by the health insurance.<sup>99</sup> There is no data on the number of children in need of additional healthcare costs, but according the World Health Organization (WHO) out-of-pocket payments for health services (estimated to 39 % of current spending on health) are a major barrier to access to healthcare for migrants.<sup>100</sup>

In **Bulgaria**, according to a recent study on the access to healthcare, conducted among adult persons granted temporary protection, the main challenges faced by people from Ukraine are the lack of sufficient information on healthcare rights, the language barrier, and the limited access to specialised appliances, such as devices for measuring blood pressure or blood glucose.<sup>101</sup>

In **Bulgaria**, many people from Ukraine, who have valid health insurance in Bulgaria, have not registered with a general practitioner (GP) and thus have limited access to outpatient care.<sup>102</sup> CSOs point out as the main reason for this situation the insufficient

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<sup>97</sup> Bulgaria, Health Act ([Закон за здравето](#)), 1 December 2005, last amended 25 January 2023, Art. 209(3).

<sup>98</sup> For example, see Krasteva, N. (2022), 'Association Pituitary raises funds for medicines for refugees from Ukraine' (['Асоциация „Хипофиза“ набира средства за лекарства за бежанци от Украйна'](#)), Bulgarian National Radio, 15 November 2022.

<sup>99</sup> 24 Chasa (2023), 'It is recommended to also include refugees in the National Health Strategy by 2030' (['Искат и бежанците да са в Националната здравна стратегия до 2030 г.'](#)), 24 March 2023.

<sup>100</sup> World Health Organization (2023), [Report on refugee health: assessment of the Bulgarian health system's needs within the context of the crisis in Ukraine](#), Geneva, World Health Organization, 21 March 2023.

<sup>101</sup> Lyubenova, A. et al. (2023), *Access to healthcare of Ukrainian refugees in Bulgaria: results of a survey among Ukrainian refugees and health system representatives* ([Достъп до здравеопазване за украинските бежанци в България: Резултати от проучване сред украински бежанци и представители на здравната система](#)), Sofia, National Patients' Organisation, 22 February 2023.

<sup>102</sup> Kachaunova, A. et al. (2023), *Human Rights in Bulgaria in 2022* ([Правата на човека в България през 2022 г.](#)), Sofia, Bulgarian Helsinki Committee, 16 May 2023, p. 121.



number of GPs and pediatricians, who have vacancies on their lists, speak the language, and are willing to enroll persons from Ukraine.<sup>103</sup> According to the civil society organisation Support for Ukraine (*Подкрепа за Украйна*), only 32 % of the people from Ukraine displaced in Bulgaria have a general practitioner. At the same time, volunteers often advise people with severe disabilities to go to other countries with better healthcare arrangements.<sup>104</sup>

### 3.1.3. Mental health and psychosocial support for children fleeing Ukraine

In **Bulgaria**, Ukrainian children granted temporary protection have the same rights to free healthcare (including mental healthcare and psychological support) as all Bulgarian children.<sup>105</sup> Upon request, children can receive the mental healthcare services included in the health insurance package if their general practitioner refers them to a specialist, however, no screening is carried out to proactively identify mental conditions. There are 22 child psychiatrists in Bulgaria and three inpatient wards for children (in Sofia, Plovdiv and Varna) with a total capacity of 29 beds.<sup>106</sup> There are some outpatient facilities for children in Sofia and Russe. At the same time, according to CSOs, a major share of mental healthcare and psychological support is provided by civil society organisations and specialists working on a voluntary basis.<sup>107</sup>

In **Bulgaria**, according to the World Health Organization (WHO), Ukrainian prescriptions are not valid and only 40 % of psychiatric medicine is covered under the National Health Insurance Fund (NHIF) (*Национална здравноосигурителна каса, НЗОК*). The essential psychotropic drug list is not cross-checked with the Ukrainian list,

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<sup>103</sup> Kachaunova, A. et al. (2023), *Human Rights in Bulgaria in 2022* ([Правата на човека в България през 2022 г.](#)), Sofia, Bulgarian Helsinki Committee, 16 May 2023, p. 121.

<sup>104</sup> Offnews (2023), '32 % of Ukrainian refugees have a general physician in our country' (['32 % от украинските бежанци имат личен лекар у нас'](#)), 24 March 2023.

<sup>105</sup> Bulgaria, Asylum and Refugees Act ([Закон за убежището и бежанците](#)), 1 December 2002, last amended 26 April 2022, Art. 39.

<sup>106</sup> European Psychiatric Association (2019), [Report on Bulgarian Mental Health Care and Reform Process 2018](#), Strasbourg, European Psychiatric Association.

<sup>107</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care?* ([Бележник 2023: Какъв е средният успех на държавата в грижата за децата?](#)), 31 May 2023.

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which may cause problems accessing necessary medicines, particularly for people with chronic mental health disorders.<sup>108</sup>

In **Bulgaria**, UNICEF and UNHCR opened several Blue Dot support centres for children fleeing the war in Ukraine. They provide information, legal advice, psychosocial support, identification and referral to services for children, women, families, unaccompanied children and other groups at specific increased risk.<sup>109</sup>

In **Bulgaria**, the Bulgarian Red Cross (BRC) (*Български червен кръст*, БЧК) maintains a hotline offering psychosocial support to people fleeing Ukraine including children. The hotline operates since 7 March 2022 and offers support in Ukrainian and Russian language three days a week.<sup>110</sup> As of 23 August 2023, a total of 12,646 consultations have been provided.<sup>111</sup>

In **Bulgaria**, a number of CSOs implement projects in support of children fleeing the war in Ukraine, which include, among other activities, the provision of psychological and psychiatric support. One such project was implemented by the charity organisation Karin Dom (*Карин дом*) based in Varna. It offered tailored psychological support activities and therapy to children from Ukraine in need of such support.<sup>112</sup> The civil society organisation Child and Space Association (*Сдружение „Дете и пространство“*) carried out a similar project in Sofia.<sup>113</sup>

In **Bulgaria**, the National Centre for Public Health and Analysis (NCPHA) (*Национален център за обществено здраве и анализи*, НЦОЗА) prepared a guide for providing psychosocial support to refugees. The guide aims to assist frontline workers and volunteers providing specialised psychiatric and psychosocial support to persons fleeing the war in Ukraine and other refugees and asylum seekers.<sup>114</sup>

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<sup>108</sup> World Health Organization (2023), *Report on refugee health: assessment of the Bulgarian health system's needs within the context of the crisis in Ukraine*, Geneva, World Health Organization, 21 March 2023, p. 18.

<sup>109</sup> For more information, see the [website](#) of UNICEF.

<sup>110</sup> For more information, see the [website](#) of the Bulgarian Red Cross.

<sup>111</sup> For more information, see the [website](#) of the Bulgarian Red Cross.

<sup>112</sup> For more information, see the [website](#) of Karin Dom.

<sup>113</sup> For more information, see the [website](#) of Child and Space Association.

<sup>114</sup> Dimitrov, P. and Tsoleva, G. (eds.) (2023), *Guide for providing psychosocial support to refugees (Ръководство за психо-социална подкрепа на бежанци)*, Sofia, National Centre for Public Health and Analysis, 22 May 2023.

## 3.2. Access to education

### 3.2.1. Types of schooling

In **Bulgaria**, many Ukrainian children continued their education remotely in the Ukrainian educational system, at least until completing the school year they have started in Ukraine.<sup>115</sup> In an effort to support the Ukrainian children in this process, the Bulgarian publishing company Prosveta (*Просвета*) joined the European Educational Publishers Group's initiative to provide access to all Ukrainian educational books from first to twelfth grade of the Ukrainian publisher Ranok Publishers. The access was provided through Prosveta's electronic resources portal.<sup>116</sup> In July 2022, the Embassy of Ukraine, in cooperation with the Bulgarian Ministry of Education and Science (MES) (*Министерство на образованието и науката, МОН*), the Technical University (*Технически университет*) in Sofia and the Economic University (*Икономически университет*) in Varna made arrangements for 548 Ukrainian high school graduates to take their National Multi-Subject Tests (NMT) in Bulgaria.<sup>117</sup> The NMT is a computer-based form of Bachelor's Degree programme entrance examination provided for assessment of applicants' learning outcomes in the Ukrainian Language, Mathematics and the History of Ukraine.

In **Bulgaria**, civil society organisation Situation Centre Open Doors (*Ситуационен център „Отворени врати“*) maintains an educational centre for children that offering classes that supplement the online education under the Ukrainian programme.<sup>118</sup> The centre is described in detail in Annex 2.

In **Bulgaria**, children aged four years and over with granted temporary protection have the same rights to free education in the Bulgarian educational system as Bulgarian

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<sup>115</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care? (Бележник 2023: Какъв е средният успех на държавата в грижата за децата?)*, 31 May 2023, p. 41.

<sup>116</sup> For more information, see [website](#) of Prosveta.

<sup>117</sup> Damyanov, E. (2023), 'Matriculation exams for Ukrainian high school graduates in our country' (*'Провеждат матури за украинските зрелостници у нас'*), *Nova News*, 26 July 2022.

<sup>118</sup> For more information, see the profile of the Situation Centre Open Doors on the platform [Migrantlife.bg](#).

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children.<sup>119</sup> Education in Bulgaria is mandatory for children between the age of four and 16 years and parents who do not enrol their children pay a fine.<sup>120</sup> National educational and child protection authorities reported that this obligation does not automatically refer to temporary protection holders.<sup>121</sup> According to the civil society organisation National Network for Children (NNC) (*Национална мрежа за децата*, НМД), during the 2022/2023 school year less than 10 % of the Ukrainian children residing in Bulgaria were enrolled into the formal education system.<sup>122</sup> Other estimates say that as of 12 September 2022 (two days before the start of the 2022/2023 school year), 1.5 % of the 39,143 Ukrainian children in Bulgaria were enrolled in schools and kindergartens.<sup>123</sup> According to the Ombudsman, as of the same date, less than half of the children wishing to attend Bulgarian kindergartens and 77 % of those wishing to be enrolled in Bulgarian schools were actually admitted.<sup>124</sup> Experts from the Ministry of Education and Science (MES) (*Министерство на образованието и науката*, МОН) commented in the media that the main reason behind the low coverage is the option for Ukrainian children to resume their Ukrainian education online.<sup>125</sup> However, despite Ministry of Education and Science (MES) (*Министерство на образованието и*

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<sup>119</sup> Bulgaria, Asylum and Refugees Act ([Закон за убежището и бежанците](#)), 1 December 2002, last amended 26 April 2022; Bulgaria, Preschool and School Education Act ([Закон за предучилищното и училищното образование](#)), 1 August 2016, last amended 2 February 2023, Art. 8.

<sup>120</sup> Bulgaria, Preschool and School Education Act ([Закон за предучилищното и училищното образование](#)), 1 August 2016, last amended 2 February 2023, Art. 347.

<sup>121</sup> Interview with an expert from the State Agency for Child Protection (*Държавна агенция за закрила на детето*) conducted on 27 June 2023 and interview with an expert from the Ministry of Education and Science (*Министерство на образованието и науката*) conducted on 28 June 2023.

<sup>122</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care? (Бележник 2021: Какъв е средният успех на държавата в грижата за децата?)*, 31 May 2023, p. 41.

<sup>123</sup> Georgieva, S. (2022), 'Less than 2 % of Ukrainian children are enrolled in school or kindergarten' (*Под 2% от украинските деца у нас са записани на училище или градина*), *Sega daily*, 14 September 2022.

<sup>124</sup> Bulgaria, Ombudsman of the Republic of Bulgaria (*Омбудсман на Република България*) (2023), Annual report on the activities of the Ombudsman of the Republic of Bulgaria in 2022 (*Годишен доклад за дейността на омбудсмана на Република България през 2022 г.*), 12 April 2023.

<sup>125</sup> Georgieva, S. (2022), 'Less than 2 % of Ukrainian children are enrolled in school or kindergarten' (*Под 2% от украинските деца у нас са записани на училище или градина*), *Sega daily*, 14 September 2022.

науката, МОХ) stated that the national education system had the capacity to accept all Ukrainian children (see section 3.2.2), UNICEF reports that in the regions of Burgas and Varna there are places where the number of refugee children exceeds the local capacity.<sup>126</sup> Authorities there refer children to the closest schools/kindergartens that have available places.<sup>127</sup> These schools may be located at a distance that might require additional travel costs. Other barriers for attending Bulgarian schools are the requirement for having all necessary immunisations and the clumsy procedure for referring children to schools.<sup>128</sup> In general, according to child protection authorities, families/caregivers from Ukraine prefer their children (especially those in high school age) to continue their Ukrainian education because they plan to return to Ukraine in the near future.<sup>129</sup>

**Table 5 – Enrolment and attendance of children fleeing Ukraine**

Types of schooling		Number of children enrolled	Number of children attending	Source
National formal educational system	Children in nursery	737	737	Ministry of Education and Science Data refers to 15 May 2023
	Children in primary education	1,026	1,026	Ministry of Education and Science Data refers to 15 May 2023 and includes children aged seven to ten years enrolled in first to fourth grade

<sup>126</sup> UNICEF (2023), '[Ukraine Refugee Response in Bulgaria: Factsheet June 2023](#)', 20 June 2023.

<sup>127</sup> Ministry of Education and Science (2023), Letter No 16-90/15.06.2023 to the Center for the Study of Democracy, 15 June 2023.

<sup>128</sup> Georgieva, S. (2022), 'Less than 2 % of Ukrainian children are enrolled in school or kindergarten' (['Под 2% от украинските деца у нас са записани на училище или градина'](#)), *Sega daily*, 14 September 2022.

<sup>129</sup> Interview with an expert from the State Agency for Child Protection (*Държавна агенция за закрила на детето*) conducted on 27 June 2023.

	Children in secondary education	1,009	1,009	Ministry of Education and Science Data refers to 15 May 2023 and includes children aged ten to seventeen years enrolled in fifth to seventh grade (625 children) and eighth to twelfth grade (284 children)
	Physical attendance of Ukrainian led school / educational setting	N/A	N/A	Ministry of Education and Science
	Online attendance of Ukrainian led school / educational setting	N/A	N/A	Ministry of Education and Science

Source: Ministry of Education and Science (2023), Letter No 16-90/15.06.2023 to the Center for the Study of Democracy, 15 June 2023.

### 3.2.2. Support to integration in the formal educational system

In **Bulgaria**, the Ministry of Education and Science (MES) (*Министерство на образованието и науката*, МОН) reported that it had the capacity to include in the formal education system all Ukrainian children residing in Bulgaria.<sup>130</sup> Ukrainian children wishing to be enrolled in a Bulgarian kindergarten or school must apply in person or via email to any of the 28 Regional Departments of Education (RDEs) (*Регионални управления на образованието*, РУО).<sup>131</sup> Each RDE has published on its

<sup>130</sup> Bulgaria, Ministry of Education and Science (*Министерство на образованието и науката*) (2023), '1,400 university students from Ukraine study in Bulgaria' (['1400 студенти от Украйна се обучават в България'](#)), press release, 30 January 2023.

<sup>131</sup> Bulgaria, Regulation No 3 of 6 April 2017 on the conditions and procedures for the reception and training of persons seeking or granted international protection ([Наредба No](#)

website the contacts of an official speaking English and/or Russian for applicants experiencing language difficulties. Upon receiving the application, the RDE refers the child to a school or kindergarten based on their age and completed level of education.<sup>132</sup> Children are enrolled in kindergartens and schools only if they have all the necessary immunisations for their age.<sup>133</sup>

In **Bulgaria**, once enrolled in a school or kindergarten, Ukrainian children receive additional classes in Bulgarian as a foreign language, psychological support, if necessary, as well as other personal development support activities, and additional personal development support activities, if necessary, including resource support for children with special educational needs. The principals of schools and kindergartens are responsible for ensuring the provision of such support and for assessing the need of it.<sup>134</sup> Schools that do not have enough specialised teachers within their permanent staff are allowed to temporarily appoint new ones, or, alternatively, involve the children in additional online classes in Bulgarian language and/or other specific subjects. Children attending these additional Bulgarian language or other classes online are also provided with electronic devices for the duration of the training.<sup>135</sup> The Ministry of Education and Science (MES) (*Министерство на образованието и науката*, MOH) has published on its website various resources related to the education of children from Ukraine, including curricula, free access workbooks and tests for teaching Bulgarian as a foreign language, etc.<sup>136</sup>

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[З от 6 април 2017 г. за условията и реда за приемане и обучение на лицата, търсеци или получили международна закрила](#)), 6 April 2017.

<sup>132</sup> Bulgaria, Regulation No 11 of 1 September 2016 on the assessment of students' learning outcomes ([Наредба № 11 от 1 септември 2016 г. за оценяване на резултатите от обучението на учениците](#)), 20 September 2016, last amended 13 June 2023.

<sup>133</sup> For more information, see the [website](#) of the Ministry of Education and Science

<sup>134</sup> Bulgaria, Ministry of Education and Science (*Министерство на образованието и науката*) (2022), Information on the admission and education procedure for children and students in pre-school and school age from Ukraine in Bulgarian state and municipal kindergartens and schools ([Информация относно процедурата за приемане и обучение на деца и ученици в предучилищна и училищна възраст от Украйна в български държавни и общински детски градини и училища](#)), 29 March 2022.

<sup>135</sup> Bulgaria, Ministry of Education and Science (*Министерство на образованието и науката*) (2023), 'Students from Ukraine will have extra online lessons' (['Учениците от Украйна ще имат допълнителни онлайн уроци'](#)), press release, 12 April 2022.

<sup>136</sup> For more information, see the [website](#) of the Ministry of Education and Science.

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In **Bulgaria**, the national textbook publisher Prosveta (*Просвета*) reported that it was prepared to provide free Bulgarian textbooks for all Ukrainian children enrolled in Bulgarian kindergartens and schools.<sup>137</sup> In order to receive them, the principals of schools and kindergartens were invited to submit requests to the publisher specifying the necessary amounts. There is no available data on the number textbooks requested during this campaign.

In **Bulgaria**, public authorities and CSOs launched a number of projects aimed to inform Ukrainian children about the options of continuing their education in Bulgaria. For example, the civil society organisation Astra Forum Foundation (*Фондация Астра Форум*) in partnership with the Sofia City Regional Department of Education (*Регионално управление на образованието София-град*) organised a series of information events, both online and in-person, to explain to children from Ukraine the Bulgarian educational legislation and the options for joining the national education system.<sup>138</sup> Civil society organisations are also organising various activities aimed to integrate Ukrainian children in the education system (summer schools, language courses, art activities, etc.).<sup>139</sup>

### 3.2.3. Data on drop outs and NEETs (not in education, employment, or training)

In **Bulgaria**, there is no available data on drop outs and NEETs among Ukrainian children and young people.<sup>140</sup> According to the Ministry of Education and Science (MES) (*Министерство на образованието и науката*, МОН), some 1,400 Ukrainian students attend Bulgarian universities.<sup>141</sup>

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<sup>137</sup> For more information, see the [website](#) of Prosveta.

<sup>138</sup> For more information, see the [website](#) of Astra Forum Foundation.

<sup>139</sup> For example, see the [website](#) of the Ukrainian diaspora organization Ukrainian Vulik (*Український Вулик*).

<sup>140</sup> Bulgaria, Ministry of Education and Science (*Министерство на образованието и науката*) (2023), Letter No 16-90/15.06.2023 to the Center for the Study of Democracy, 15 June 2023.

<sup>141</sup> Bulgaria, Ministry of Education and Science (*Министерство на образованието и науката*) (2023), '1,400 university students from Ukraine study in Bulgaria' (['1400 студенти от Украйна се обучават в България'](#)), press release, 30 January 2023.



### 3.3. Access to social welfare – forms of social assistance related to children

In **Bulgaria**, several forms of assistance are available to Ukrainian children (and families). The same forms of assistance are available to all people with granted international protection or residence status.<sup>142</sup> First, families can apply once a year for one-off financial assistance of up to BGN 375 (approximately €188) for covering occasional costs related to healthcare, education, utility costs and other vital needs.<sup>143</sup> In 2022, 47,736 Ukrainian families have received such assistance.<sup>144</sup> The second one-off financial assistance, available to Ukrainian families, consists of vouchers worth BGN 100 (approximately €50) for covering initial costs for food and essential goods. Each family member, including children, receives an individual voucher.<sup>145</sup> As of the end of 2022, the local Social Assistance Directorates (SAD) (*Дирекция „Социално подпомагане“*, ДСП) have given away a total of 32,443 vouchers.<sup>146</sup>

In **Bulgaria**, some social benefits do not automatically apply to persons granted temporary protection. For example, children with disabilities granted temporary protection are not covered by and do not have access to the financial support provided for in the Family Benefits for Children Act (*Закон за семейните помощи за деца*),<sup>147</sup> with the exception of medical equipment.<sup>148</sup>

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<sup>142</sup> For more information, see the [website](#) of the Social Assistance Agency.

<sup>143</sup> Bulgaria, Rules on for the Implementation of the Social Assistance Act ([Правилник за прилагане на Закона за социално подпомагане](#)), 5 November 1998, last amended 19 May 2022, Art. 16.

<sup>144</sup> Bulgaria, Ombudsman of the Republic of Bulgaria (*Омбудсман на Република България*) (2023), Annual report on the activities of the Ombudsman of the Republic of Bulgaria in 2022 ([Годишен доклад за дейността на омбудсмана на Република България през 2022 г.](#)), 12 April 2023, p. 315.

<sup>145</sup> For more information, see the [website](#) of the Social Assistance Agency.

<sup>146</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care? (Бележник 2021: Какъв е средният успех на държавата в грижата за децата?)*, 31 May 2023.

<sup>147</sup> Bulgaria, Family Benefits for Children Act ([Закон за семейните помощи за деца](#)), 1 April 2002, last amended 23 December 2022.

<sup>148</sup> World Health Organization (2023), [Report on refugee health: assessment of the Bulgarian health system's needs within the context of the crisis in Ukraine](#), Geneva, World Health Organization, pp. 16-17.

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In **Bulgaria**, in addition to the social assistance provided by the state, financial support is also provided by international organisations and CSOs. The Bulgarian Red Cross (BRC) (*Български червен кръст*, БЧК) provides a one-off assistance of BGN 125 (approximately €62.50) to every member of a household with a child aged under 18 years or a pregnant or nursing woman.<sup>149</sup> IOM Bulgaria implements a support programme offering a number of assistance activities with a focus on vulnerable people. Families with children and children with disabilities, unaccompanied children, as well as victims of violence, trafficking and torture are among the groups eligible for assistance.<sup>150</sup> UNICEF Bulgaria implements a cash assistance programme for families with children, which has reached 228 children (including 33 children with disabilities).<sup>151</sup>

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<sup>149</sup> For more information, see the [website](#) of the Bulgarian Red Cross.

<sup>150</sup> For more information, see the [website](#) of IOM Bulgaria.

<sup>151</sup> UNICEF Bulgaria (2022), [Ukraine Refugee Response in Bulgaria: Factsheet](#), December 2022.

## 4. Additional legal and practical barriers and challenges

### 4.1. General challenges

In **Bulgaria**, many of the challenges that might prevent children from Ukraine from accessing support services are common challenges that affect other vulnerable groups as well. One such challenge is, for example, the numerous administrative and bureaucratic hurdles, some of which are laid down in the legislation, that make it difficult for beneficiaries to get the support to which they are entitled. People from Ukraine with granted temporary protection often have to present different types of documents to access health, educational or social services.<sup>152</sup> The language barrier is another challenge that is often mentioned as an obstacle in communicating with different authorities. Different studies, point out the language issue as a barrier to accessing healthcare,<sup>153</sup> support through the National Children’s Helpline 116 111,<sup>154</sup> etc.

In **Bulgaria**, CSOs and volunteers invested significant effort to neutralise the gaps in the support measures implemented by the government, particularly during the first months after the start of the war. The civil society sector organised in due course a

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<sup>152</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care? (Бележник 2021: Какъв е средният успех на държавата в грижата за децата?)*, 31 May 2023.

<sup>153</sup> Lyubenova, A. et al. (2023), *Access to healthcare of Ukrainian refugees in Bulgaria: results of a survey among Ukrainian refugees and health system representatives (Достъп до здравеопазване за украинските бежанци в България: Резултати от проучване сред украински бежанци и представители на здравната система)*, Sofia, National Patients’ Organisation, 22 February 2023.

<sup>154</sup> National Network for Children (*Национална мрежа за децата*) (2023), *Gradebook 2023: What is the average score of the State in child care? (Бележник 2021: Какъв е средният успех на държавата в грижата за децата?)*, 31 May 2023, pp. 40-41.

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number of activities to provide private accommodation,<sup>155</sup> food and essential goods,<sup>156</sup> targeted (health) support for vulnerable people,<sup>157</sup> childcare and education activities,<sup>158</sup> etc.

## 4.2. Challenges for children at multiple risk/disadvantage

In **Bulgaria**, according to the Ombudsman, people with disabilities granted temporary protection have less possibilities to access the support they need compared to persons seeking or having received international protection. Within the procedure for granting temporary protection, no individual assessment is carried out to determine the needs of people (including children) with disabilities, which in turn limits the implementation of the individual approach when providing them with support. According to the Ombudsman, for people with disabilities, the international protection procedure would be a better option as it would give them more rights to access the national health, education and social systems.<sup>159</sup> Furthermore, the disability recognition documents issued in Ukraine are not valid in Bulgaria.<sup>160</sup> Because of that, persons with disabilities from Ukraine, who wish to access the Bulgarian social system, have to go through the entire disability recognition procedure in Bulgaria, including some expensive medical tests. Due to the political crisis in the country, the government did not manage to add the temporary protection holders to the group of people who

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<sup>155</sup> Mediapool (*Медиапул*) (2022), 'Most Ukrainian refugees are accommodated free of charge in the homes of volunteers' (*'Повечето украински бежанци са настанени безплатно в домовете на доброволци'*), 26 March 2022.

<sup>156</sup> For more information, see the [website](#) of the Bulgarian Red Cross.

<sup>157</sup> For one such initiative aimed at providing assistance to small children and pregnant women, see the [website](#) of Our Premature Children Foundation.

<sup>158</sup> For more information, see [website](#) of Teach for Bulgaria.

<sup>159</sup> Bulgaria, Ombudsman of the Republic of Bulgaria (*Омбудсман на Република България*) (2023), Annual report on the activities of the Ombudsman of the Republic of Bulgaria in 2022 (*Годишен доклад за дейността на омбудсмана на Република България през 2022 г.*), 12 April 2023, p. 221.

<sup>160</sup> For more information, see the [website](#) of the Ministry of Labour and Social Policy.

could automatically benefit from the social disability system.<sup>161</sup> As a result, children with disabilities coming from Ukraine cannot receive benefits under the Family Benefits for Children Act (*Закон за семейните помощи за деца*).<sup>162</sup> To fill this gap, CSOs and international organisations provide support to families with children with disabilities under their own projects. One such project is the project “Emergency Early Childhood Development Support for Ukrainian Refugees”, implemented by the European Association of Service Providers for Persons with Disabilities.<sup>163</sup> Activists and volunteers also organise fundraising campaigns to respond to the needs of children with disabilities such as special food, wheelchairs and ambulances. Some of them, however, advise parents of children with disabilities to move to other countries where the social system can adequately support their children’s needs.<sup>164</sup>

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<sup>161</sup> Bulgaria, Ombudsman of the Republic of Bulgaria (*Омбудсман на Република България*) (2023), Annual report on the activities of the Ombudsman of the Republic of Bulgaria in 2022 (*Годишен доклад за дейността на омбудсмана на Република България през 2022 г.*), 12 April 2023, p. 222.

<sup>162</sup> Bulgaria, Family Benefits for Children Act (*Закон за семейните помощи за деца*), 1 April 2002, last amended 23 December 2022.

<sup>163</sup> For more information, see the [website](#) of the European Association of Service Providers for Persons with Disabilities.

<sup>164</sup> Semkovska, D. (2022), ‘Adelina Banakieva: Bulgaria is not prepared to accept refugees with special needs’ (*‘Аделина Банакиева: България не е подготвена да приема бежанци със специални потребности’*), *Bulgarian National Radio*, 21 March 2022.

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## 5. Policies in place

### 5.1. Dedicated action plan and/or integrated measures

In **Bulgaria**, there is no policy or action plan specifically targeting children fleeing Ukraine. In July 2022, the government updated the national Action Plan for Temporary Protection in the Republic of Bulgaria (*План за действие при временна закрила в Република България*) to adapt it to the needs of people displaced from Ukraine.<sup>165</sup> The plan describes in detail the steps to be undertaken by all relevant authorities in cases of mass relocation of people to Bulgaria, including registration, first reception and provision of essential goods. Regarding children, the plan envisages separate temporary accommodation at border checkpoints for families and children, as well as allocation of space for playgrounds for smaller children. It also envisages the provision of specific emergency packs of essential goods (food and sanitary products) for children of different age groups. For example, each child aged up to two years should get one liter of milk, six packs of baby food, two yoghurts, three packs of biscuits, six croissants, six instant soups and one pack of instant milk for the first six days of arrival. In terms of sanitary products, children get a toothbrush and a toothpaste, toilet paper/diapers, soap and washing powder.<sup>166</sup>

In **Bulgaria**, the government adopted a Humanitarian Assistance Programme for Displaced Persons from Ukraine with Temporary Protection in Bulgaria (*Програма за хуманитарно подпомагане на разселени лица от Украйна с предоставена временна закрила в Република България*). The duration of the programme was extended several times, most recently until 30 September 2023.<sup>167</sup> The programme

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<sup>165</sup> Bulgaria, Council of Ministers (*Министерски съвет*), Updated Action Plan for Temporary Protection in the Republic of Bulgaria ([Актуализиран план за действие при временна закрила в Република България](#)), 27 July 2022.

<sup>166</sup> Bulgaria, Council of Ministers (*Министерски съвет*), Updated Action Plan for Temporary Protection in the Republic of Bulgaria ([Актуализиран план за действие при временна закрила в Република България](#)), 27 July 2022, Annex 11.

<sup>167</sup> Bulgaria, Council of Ministers (*Министерски съвет*), Decision No 454 of 27.06.2023 extending the duration of the Programme for Humanitarian Assistance to Displaced Persons from Ukraine Granted Temporary Protection in the Republic of Bulgaria ([Решение № 454](#))

reimburses the costs of accommodation facilities hosting persons from Ukraine with temporary protection status. Initially, the programme covered all accommodation facilities, including private hotels, but since 1 November 2022, only state-owned and municipal recreational bases are eligible for reimbursement.<sup>168</sup>

In **Bulgaria**, support to children displaced from Ukraine is provided through the EU funding programmes. In August 2022, the European Commission approved the project BG05FMOP001-6.001 "Provision of vouchers for the provision of food and basic necessities for displaced persons from Ukraine" under the Operational Programme for Food and/or Basic Material Assistance (OPFBA) 2014-2020.<sup>169</sup> The programme envisages the provision of 40,000 vouchers worth BGN 100 (approximately €50) to each person displaced from Ukraine, including children, for covering initial costs for food and essential goods.

In **Bulgaria**, EU funds were also allocated to support the education of children from Ukraine. The Monitoring Committee of Education Programme 2021-2027 (*Програма „Образование“ 2021 – 2027*) expanded the scope of the project "Equal access to schooling in times of crisis" (*„Равен достъп до училищно образование в условията на кризи“*) to include activities targeting children from Ukraine enrolled in the Bulgarian educational system. The project covers the hiring of additional teachers to deliver general or additional personal development support activities and online lessons in Bulgarian language.<sup>170</sup>

In **Bulgaria** there are numerous initiatives at the local level, including public-private partnerships, aimed to support children from Ukraine. For example, the Municipality of Burgas, which is one of the most preferred locations by persons from Ukraine, in cooperation with UNICEF Bulgaria implement the project "UNICEF Bulgaria and Municipality of Burgas – together in support of vulnerable children and young people" (*„УНИЦЕФ България и Община Бургас – заедно в подкрепа на уязвими деца и младежи“*). The project has a budget of BGN 528,665.92 (approximately €264,332)

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[от 27.06.2023 г. за удължаване на Програмата за хуманитарно подпомагане на разселени лица от Украйна с предоставена временна закрила в Република България](#)), 27 June 2023.

<sup>168</sup> For more information, see the [National Portal of Information and Mutual Assistance for People Affected by the War in Ukraine](#).

<sup>169</sup> Bulgaria, Council of Ministers (*Министерски съвет*), [Operational Programme under the Fund for European Aid to the Most Deprived 2014 – 2020](#), 18 August 2022.

<sup>170</sup> For more information, see the programme's [website](#).

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and duration until the end of 2023.<sup>171</sup> The project envisages the reconstruction and opening of a community centre for day-care for children aged three to six years, a shared studying space for children aged 7-14 years, and a centre offering psychological support, counselling, advocacy and career development for vulnerable children and young people aged 10-24.

## 5.2. European Child Guarantee

In **Bulgaria**, the European Child Guarantee action plan acknowledges the war in Ukraine as a risk factor for children's rights and an economic challenge deepening vulnerability of children. The plan defines the children fleeing Ukraine, in particular those arriving unaccompanied, as one of its target groups.<sup>172</sup> The document is structured along 14 goals, such as reducing the share of children at risk of poverty and reducing the number of children dropping out of school. These goals apply to all children, including those from Ukraine. Apart from that, there are no other measures specifically targeting children fleeing Ukraine.

## 5.3. Budget

In **Bulgaria**, the national budget does not have separate budget lines on child policies. The budget allocated to individual public authorities is broken down by policy areas, none of which is defined as child protection/welfare. According to the Public Finances Act (*Закон за публичните финанси*), the national budget has three components, each adopted by a separate law. These are the state budget, the state social security budget and the national health insurance fund budget. Due to the political crisis and the frequent parliamentary elections, the parliament was unable to adopt on time the

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<sup>171</sup> Bulgaria, Municipality of Burgas (*Община Бургас*) (2022), Report of the Burgas Mayor to the Municipal Council No 08-00-13565 of 9 December 2022 ([Докладна записка от Димитър Николов – кмет на Община Бургас 08-00-13565/09.12.2022](#)), 9 December 2022.

<sup>172</sup> Bulgaria, Council of Ministers (*Министерски съвет*), Action plan implementing Council Recommendation (EU) 2021/1004 establishing a European Child Guarantee 2030 ([План за действие в изпълнение на Препоръка \(ЕС\) 2021/1004 на Съвета за създаване на Европейска гаранция за детето 2030](#)), 9 November 2022.



budget for 2023.<sup>173</sup> As a consequence, the budget for 2022 was extended and applied until a new one was properly voted.<sup>174</sup>

In **Bulgaria**, the government uses EU funds to co-finance the provision of accommodation and meals to people from Ukraine, who do not have access to private accommodation. The support is provided in the framework of the Humanitarian Assistance Programme for Displaced Persons from Ukraine with Temporary Protection in Bulgaria (*Програма за хуманитарно подпомагане на разселени лица от Украйна с предоставена временна закрила в Република България*). The programme is implemented as a project under the Operational Programme “Good Governance” 2014-2020 (*Оперативна програма „Добро управление“ 2014-2020*) with a budget of BGN 40 million (approximately €20 million). The project’s goal is to provide accommodation to 68,554 persons, including 27,768 children.<sup>175</sup>

In **Bulgaria**, EU funds are also used to support the integration of Ukrainian children into the Bulgarian educational system. This is done in the framework of the project “Equal access to schooling in times of crisis” (*„Равен достъп до училищно образование в условията на кризи“*), implemented under the Operational Programme “Science and Education for Smart Growth” 2014-2020 (*Оперативна програма „Наука и образование за интелигентен растеж“ 2014-2020*). The project has a budget of BGN 109,562,542 (approximately €54,781,271).<sup>176</sup>

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<sup>173</sup> Since the resignation of the government in June 2022, the parliament was not able to elect a regular government until June 2023, which resulted in a series of parliamentary elections. The caretaker government appointed by the President decided to extend the budget for 2022 instead of proposing a new one for 2023. For more information, see Rizova, D. (2022), ‘The caretaker cabinet will not table a draft budget for 2023’ (*‘Служебният кабинет няма да внася проектобюджет за 2023 г.’*), *bTV*, 25 October 2022.

<sup>174</sup> Bulgaria, Act on Amending and Supplementing the Act on the Implementation of Provisions of the 2022 State Budget Act, the 2022 Budget of the State Social Security Act and the 2022 Budget of the National Health Insurance Fund Act (*Закон за изменение и допълнение на Закона за прилагане на разпоредби на Закона за държавния бюджет на Република България за 2022 г., Закона за бюджета на държавното обществено осигуряване за 2022 г. и Закона за бюджета на Националната здравноосигурителна каса за 2022 г.*), 20 June 2023.

<sup>175</sup> For more information, see the [website](#) of the Ministry of Tourism.

<sup>176</sup> For more information, see the [website](#) of the Ministry of Education and Science.

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## Annex 1 – Research and data

**Table 6 – Research on experiences of children fleeing Ukraine**

Surveys or research studies on experiences of children fleeing Ukraine	
Name/title	Survey on access to the healthcare system among Ukrainian refugees and institutional representatives
Main findings (max. 1000 chars)	The survey explores the access to healthcare of persons displaced from Ukraine in general. It is not specifically targeted at children, but its findings are equally relevant to the situation of all persons from Ukraine, including children. According to the survey results, refugees from Ukraine have access to healthcare in Bulgaria and are satisfied with it. However, some administrative barriers exist such as the lack of systematic and accessible information on their rights and on the administrative procedures, and the language barrier. Some 65 % of the people surveyed are not aware of the procedure for registering with a general practitioner, which is key precondition for accessing healthcare services. Of those who are familiar with this procedure (45 people), the highest proportion is in Plovdiv and the lowest in Sofia. People, who are not familiar with their health insurance rights, often seek help in emergency units, which results in additional costs with 60 % of the respondents reporting they had to pay for the healthcare they received. The highest share of the medical staff surveyed (42 %) believe that the people fleeing Ukraine are not satisfied with the attitude of the state, but are satisfied with the response of the civil sector.
Highlight any findings re. gender, age, disability and diverse characteristics	According to the survey results, a major unmet medical need of persons from Ukraine is the lack of medicines and medical devices (for people with chronic diseases). Psychological problems are the other health needs that are not specifically addressed.
Methodology (for surveys/polls indicate sample size and sample method)	The survey was conducted through face-to-face interviews with 127 people displaced from Ukraine aged 18 years and over, and 78 remote interviews with healthcare workers (overall 205 respondents). The group of respondents from Ukraine included predominantly mothers with children. The survey was conducted in four locations, selected for the number of Ukrainian people displaced there (Sofia, Plovdiv, Burgas, and Varna). Despite not focusing on children, the report looks at the experience of people in need of medical aid who turned to doctors for meeting the needs of their children.

Source	National Patients' Organisation ( <i>Национална пациентска организация</i> ) (2023), Access to healthcare for Ukrainian refugees in Bulgaria: results of a survey among Ukrainian refugees and health system representatives ( <a href="#"><u>Достъп до здравеопазване за украинските бежанци в България: Резултати от проучване сред украински бежанци и представители на здравната система</u></a> ), 22 February 2023
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**Table 7 – Research on experiences of children fleeing Ukraine**

Surveys or research studies on experiences of children fleeing Ukraine	
Name/title	Gradebook 2023: What is the average score of the State in child care?
Main findings (max. 1000 chars)	According to the report, the state has limited capacity to respond to crisis situations related to children, in which different bodies have to act in coordination and find quick and non-standard solutions to urgent problems. As to Ukrainian children, the report notes the persisting issue of the numerous administrative and bureaucratic obstacles, some of them laid down in the law, that hinder the actual receipt of financial support. Families with children face difficulties in overcoming administrative obstacles, especially the issuance of various documents, related to access to education, health and social services. The political crisis further complicates addressing these issues, leaving the support almost entirely in the hands of volunteers and CSOs. The psychosocial support available to children is also primarily provided by the civil society sector.
Highlight any findings re. gender, age, disability and diverse characteristics.	The report specifically highlights the situation of unaccompanied children, who are practically treated as accompanied because they arrive in the country with their relatives or other close persons. The efforts to accommodate unaccompanied Ukrainian children in social services and foster families practically failed, as the persons travelling with these children refused to participate in the procedures laid down of the national child protection legislation (a court procedure for accommodating children at risk outside the family). Although the law provides for equal access to health care of people from Ukraine and Bulgarian citizens, in practice Ukrainian refugees face obstacles in accessing necessary medical care due to the insufficient number of general practitioners or their unwillingness to register temporary protection holders as patients. Persons from Ukraine also face difficulties in purchasing some medicines, especially those not covered (fully or partially) by the National Health Insurance Fund.

Methodology (for surveys/polls indicate sample size and sample method)	The report is authored by 30 experts working in different areas of child protection, mostly coming from CSOs. Before it publication, the report is reviewed by seven experts from academia, human rights bodies and national and international organisations.
Source	National Network for Children ( <i>Национална мрежа за децата</i> ) (2023), <i>Gradebook 2023: What is the average score of the State in child care?</i> ( <a href="#"><u>Бележник 2023: Какъв е средният успех на държавата в грижата за децата?</u></a> ), 31 May 2023

## Annex 2 - Promising practices

**Table 8 – Promising practice # 1**

Promising programme / practices aimed at providing protection and support to displaced children fleeing the war in Ukraine	
Name/title	Mission Ukraine
Implementing body (public authority, CSO etc)	For Our Children Foundation (Фондация „За Нашите Деца“)
Funding body	Crowdfunding and donations
Reference in EN and original language (incl. URL, where available)	For Our Children Foundation (Фондация „За Нашите Деца“) (2022), <a href="#">About Mission Ukraine</a>
Start / end date or ongoing	March 2022 – ongoing
Main target group	Vulnerable children and their families
Scope (local/regional/national)	Local – Sofia and Plovdiv
Objectives and outputs	Starting as a rapid response humanitarian campaign, the initiative turned to a permanent programme. It aims at providing day-care for children up to 7 years and children with disabilities aged up to 10 years, and psychological, orientation, advocacy and peer support to families of these children. The programme also covers humanitarian and material support, if needed. In 2022, the campaign supported 808 children and families, 205 families obtained humanitarian support, 166 children and adults were supported to assign a general physician, 110 children took part in group activities, 42 children were enrolled in Bulgarian nurseries, kindergartens or schools, and 12 adult Ukrainians were employed in the centres. <sup>177</sup>
Brief description (max. 1000 chars)	Within two complexes for early childhood development located in Sofia and Plovdiv, the Foundation offers: <ul style="list-style-type: none"> <li>• Orientation in the institutions and advocacy for access to health and educational services for children. The Foundation's specialists assist in the</li> </ul>

<sup>177</sup> For Our Children Foundation (Фондация „За Нашите Деца“) (2023), Annual report 2022 ([Годишен доклад 2022](#)), May 2023.

	<p>enrolment of children and adults with a general practitioner, and the enrolment of children in kindergartens, nurseries and schools. Some of the families are also supported in finding employment.</p> <ul style="list-style-type: none"> <li>• Material and humanitarian support according to the needs of the families and their children (food, sanitary or educational kits).</li> <li>• Emotional and psychological support: support groups, led by a psychologist, and self-support groups, during which families exchange information and communicate freely with each other. Cultural mediators help Ukrainian families to address cultural and language differences, providing translation and necessary assistance.</li> <li>• Support for children with developmental disorders, rehabilitation or part-time care.</li> <li>• Group forms of support via games, art and conversations. The organisation also fosters the communication between social and humanitarian workers and families with children by providing them with phones and tablets with prepaid internet access.</li> <li>• The programme also employs 12 adults displaced from Ukraine increasing their qualifications by offering them additional trainings.</li> </ul>
<p>Highlight key elements of the programme/practice which makes it promising (sustainability, measurable impact etc) (max. 500 chars)</p>	<p>The programme offers practical, flexible and targeted support to families with small children and children with disabilities by targeting both children themselves and their parents. Its impact is measurable by the number of families and children benefitting from the provided activities.</p>
<p>Monitoring and evaluation and the bodies involved</p>	<p>The implementing organisation publishes annual activity reports that list all activities carried out and the results that came out of them.</p>

**Table 9 – Promising practice # 2**

<p><b>Promising programme / practices aimed at providing protection and support to displaced children fleeing the war in Ukraine</b></p>	
<p>Name/title</p>	<p>Education centre for children</p>

Implementing body (public authority, CSO etc)	Situation Centre Open Doors ( <i>Ситуационен център „Отворени врати“</i> ) maintains an educational centre for children
Funding body	Crowdfunding / donations
Reference in EN and original language (incl. URL, where available)	Situation Centre Open Doors ( <i>Ситуационен център „Отворени врати“</i> ), <a href="#">Education centre for children</a>
Start / end date or ongoing	February 2023 – ongoing
Main target group	Children aged 5-17 years
Scope (local/regional/national)	Local
Objectives and outputs	The Situation Centre Open Doors aims to provide diverse support for newly arriving persons from Ukraine, including children. Activities include educational, psychological support, crisis consultation, and cultural events featuring Ukrainian artists.
Brief description (max. 1000 chars)	The centre offers a full-day Ukrainian education programme for children in first through eleventh grade. Students are enrolled in a home-schooled mode, but study in classrooms, with teachers from Ukraine, following the Ukrainian curriculum, and the completed education is recognised by the Ukrainian educational authorities. The teachers working at the centre are from Ukraine. The centre is also open for children aged 5-6 years old who attend classes half a day. In the afternoons the children attend language courses (English, Bulgarian), art classes, music, etc. depending on the schedule of activities. During the summer months, the centre offers non-formal education and different educational activities for children aged 5 to 17 years old. The capacity of the centre is 200 children. Some 100 children were attending the centre as of the beginning of 2022/2023 school year. <sup>178</sup>
Highlight key elements of the programme/practice	The practice involves voluntary engagement of the Ukrainian diaspora in Bulgaria, the newly arriving

<sup>178</sup> Plachkova, M. (2022) 'Around 100 Ukrainian children started school at the Ukrainian Education Hub in Sofia' ([Около 100 украински деца започнаха училище в украинския образователен хъб в София](#)), *Bulgarian National Television*, 23 September 2022.

which makes it promising (sustainability, measurable impact etc) (max. 500 chars)	persons (children and adults) and the local community. Its impact is measurable by indicators such as the number of children enrolled/graduated the Ukrainian educational system, their achievements, the number of parents able to work while their children are at school, etc.
Monitoring and evaluation and the bodies involved	N/A