

Ageing in digital societies: enablers and barriers to older persons exercising their social rights

Bulgaria

June 2022

Contractor: Project One / Center for the Study of Democracy

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1 Legal and policy framework

1.1 National legislation on digital public administration

In Bulgaria, the two main legal acts that regulate the activities of the public administration – the Administration Act (*Закон за администрацията*)¹ and the Administrative Procedure Code (*Административнопроцесуален кодекс*)² – proclaim the principles of openness and accessibility without explicitly mentioning that they also apply to administrative services and procedures that can be carried out electronically.

The legislation on digital public administration consists of several core laws and regulations. Along with them, there are components treating the matter of e-services in a variety of other laws, e.g. labour, social protection, pension insurance system, health care, local governments, etc.

The main law governing digital public administration is the Electronic Government Act (*Закон за електронното управление*). According to the law, electronic administrative services shall be accessed through a single electronic portal and shall be provided in an accessible manner, including for persons with disabilities.³ Apart from this general rule and the explicit reference to persons with disabilities, the law does not refer to any other groups at risk of digital exclusion and does not provide any specific measures or safeguards to ensure equal access to services.

The technical specifications for the provision of electronic administrative services are defined in a government regulation. The regulation explicitly stipulates that electronic administrative services shall be provided in an accessible manner, also for persons with disabilities, and that the providers of electronic administrative services must provide information about the services in an understandable and accessible way.⁴ The regulation also provides a legal definition of “accessibility” – a characteristic of the information system that ensures the ability of all citizens,

¹ Bulgaria, Administration Act ([Закон за администрацията](#)) 5 November 1998, last amended 13 March 2020.

² Bulgaria, Administrative Procedure Code ([Административнопроцесуален кодекс](#)), 11 April 2006, last amended 19 February 2021.

³ Bulgaria, Electronic Government Act ([Закон за електронното управление](#)), 12 June 2007, last amended 22 February 2022, Article 12.

⁴ Bulgaria, Ordinance on general requirements for information systems, registers and electronic administrative services ([Наредба за общите изисквания към информационните системи, регистрите и електронните административни услуги](#)), 5 January 2017, last amended 14 January 2020, Article 19.

regardless of their age and physical abilities, to observe, understand, manage and interact through a user interface.⁵

1.2 National policy, strategy or action plan on the digitalisation of public services or digital inclusion

The policy framework for the digitalisation of public services in Bulgaria is laid down in the National Programme Digital Bulgaria 2025 (*Национална програма „Цифрова България 2025“*) and the Updated Strategy on the Development of e-Government in the Republic of Bulgaria for the period 2019-2025 (*Актуализирана стратегия за развитие на електронното управление в Република България 2019 – 2025 г.*).

The National Programme Digital Bulgaria 2025 (*Национална програма „Цифрова България 2025“*) defines as one of its goals (Goal 11) the creation of conditions for equal access to digital public services for all social groups including people with disabilities. The key measures to achieve this goal are effective implementation of general accessibility requirements, and ensuring that certain principles and measures are respected when creating, maintaining and updating websites and mobile applications of public sector organisations.⁶ Persons with disabilities are the only vulnerable group explicitly mentioned in the programme. Specific measures or safeguards to ensure equal access to services are not provided.

The Updated Strategy on the Development of e-Government in the Republic of Bulgaria for the period 2019-2025 (*Актуализирана стратегия за развитие на електронното управление в Република България 2019 – 2025 г.*) recognises equal access to digital public services in two of its guiding principles, namely the principle of inclusion and accessibility and the principle of social participation and digital inclusion. The principle of inclusion and accessibility is defined as the obligation of public authorities to design their electronic services to be socially inclusive and to respond to diverse needs, including the needs of older persons and persons with disabilities. The principle of social participation and digital inclusion requires all European citizens, including disadvantaged groups, citizens with disabilities, and civil society organisations, to participate and benefit fully from digital opportunities, unconditionally and without discrimination.⁷ Older persons and persons with disabilities are the only two groups at risk of digital exclusion explicitly mentioned in the strategy. The strategy refers to both groups

⁵ Bulgaria, Ordinance on general requirements for information systems, registers and electronic administrative services ([Наредба за общите изисквания към информационните системи, регистрите и електронните административни услуги](#)), 5 January 2017, last amended 14 January 2020, Item 5 of the Additional Provisions.

⁶ Bulgaria, Council of Ministers (*Министерски съвет*), National Programme Digital Bulgaria 2025 (*Национална програма „Цифрова България 2025“*), 5 December 2019, p. 36.

⁷ Bulgaria, Council of Ministers (*Министерски съвет*), Updated Strategy on the Development of e-Government in the Republic of Bulgaria for the period 2019-2025 ([Актуализирана стратегия за развитие на електронното управление в Република България 2019 – 2025 г.](#)), 2 April 2021.

only in its guiding principles and provides no specific measures or safeguards to ensure their or other disadvantaged groups' access to services.

In addition to these two policy documents, access to public services of older people is briefly mentioned in the National Development Programme Bulgaria 2030 (*Национална програма за развитие България 2030*). The programme is a strategic framework document of the highest order in the hierarchy of national programming documents, determining the vision and general goals of the development policies in all sectors of general government, including their territorial dimensions. In its section on inclusion of vulnerable groups, the document lists several impact areas, one of which is accessibility, defined as providing access to persons with disabilities and/or persons with functional limitations (as a result of physical, mental, intellectual or sensory disability, age-related disability or other causes related to their body's abilities – permanent or temporary) to, among other things, information and communication systems and technologies, including markings and other easy-to-read forms, and new technologies and systems, including the internet.⁸ Older persons are also mentioned in the section on e-health, where remote healthcare services and telemedicine are defined as measures to facilitate the access to healthcare especially for patients with special needs such as patients with chronic diseases and older people).⁹

1.3 National recovery and resilience plans covering the digitalisation of public services

The last and final version of the Bulgarian national recovery and resilience plan was adopted on 8 April 2022. It includes several national actions, reforms and planned investments related to the digitalisation of public services. In its section on connectivity, called "Connected Bulgaria", the plan identifies as a challenge that the public administration lags behind in providing secure and reliable electronic services to citizens and businesses. The reform envisaged in response to this challenge is the development and implementation of an effective policy and regulatory framework aimed, among other things, to improve the protection of the rights of end-users, including persons with disabilities.¹⁰ The section on justice, called "Fair Bulgaria", which has a separate subsection on the social inclusion of vulnerable groups and another one on healthcare, also defines as a challenge the need to speed up and finalise the digitalisation of public services. The reforms and investments, listed in this section, that are related to the digitalisation of public

⁸ Bulgaria, Council of Ministers (*Министерски съвет*), [National Development Programme Bulgaria 2030](#), 20 January 2020, p. 85.

⁹ Bulgaria, Council of Ministers (*Министерски съвет*), [National Development Programme Bulgaria 2030](#), 20 January 2020, p. 96.

¹⁰ Bulgaria, Council of Ministers (*Министерски съвет*), National Recovery and Resilience Plan of the Republic of Bulgaria ([Национален план за възстановяване и устойчивост на Република България](#)), 8 April 2022, p. 137.

services are mostly in the area of healthcare. They include, among others, elaboration of a National strategy on electronic healthcare and digitalisation of the healthcare system 2021-2030, an update of the regulatory framework of electronic healthcare, a fully operational national health information system, and the development of a national digital platform for medical diagnostics.¹¹

In its subsection on social inclusion, the plan explicitly states that the measures in this subsection aim to “encourage the social inclusion of vulnerable groups of the population (persons with disabilities, older persons and children, persons and families in a disadvantaged situation, etc.)”.¹² The subsection on healthcare adds to these groups also the “persons with minority backgrounds, persons with no valid health insurance, young persons, young mothers and pregnant women, families with children with disabilities, chronic diseases and special needs, and older persons at risk of social exclusion”.¹³ None of these groups is specifically mentioned as vulnerable to the risk of digital exclusion and no specific measures or safeguards are provided to ensure their or other disadvantaged groups’ equal access to digital services.

2 Programmes and practices aimed at ensuring equal access to public services in the digital age

In Bulgaria, there are no programmes or practices aimed at ensuring equal access to electronic public services implemented by public authorities.

There are several projects of private companies and civil society organisations aimed at facilitating the use of information technologies by older persons. One such initiative is the campaign “Internet for all 55+” („Интернет за всички 55+”), launched in 2019 by the telecommunication company A1 in cooperation with the civil society organisation Innovative Community Centers Association (Асоциация „Съвременни читалища”). The target group of the project are people over the age of 55. They receive training focused mainly on computer literacy, use of mobile devices, working with the internet, and online safety. Although the training is not specifically focused on accessing administrative services, it helps older

¹¹ Bulgaria, Council of Ministers (Министерски съвет), National Recovery and Resilience Plan of the Republic of Bulgaria ([Национален план за възстановяване и устойчивост на Република България](#)), 8 April 2022, pp. 223-234.

¹² Bulgaria, Council of Ministers (Министерски съвет), National Recovery and Resilience Plan of the Republic of Bulgaria ([Национален план за възстановяване и устойчивост на Република България](#)), 8 April 2022, pp. 211.

¹³ Bulgaria, Council of Ministers (Министерски съвет), National Recovery and Resilience Plan of the Republic of Bulgaria ([Национален план за възстановяване и устойчивост на Република България](#)), 8 April 2022, pp. 223-234.

people get used to using new technologies. In 2019, a total of 100 persons between 60 and 83 years of age completed the training.¹⁴

The non-governmental organisation Catro Bulgaria is implementing the EU-funded project My e-Start aimed to equip disadvantaged adults with the skills necessary for using the most common e-government and e-commerce services. The explicit aim of the project is to contribute to the digital inclusion of disadvantaged groups of people and address the digital gap by designing, developing and promoting sustainable and tailored products, which are widely applicable and highly impactful. The target group of the initiative are people particularly vulnerable to digital exclusion, namely older people, disadvantaged individuals with low education and training levels and people with a migration background. The project started in October 2020 and is implemented in five EU Member States. The main output of the project, which is not available yet, is an online course and a user-friendly e-platform adapted to the specific needs of the target group and providing basic knowledge about common e-government and e-commerce services.¹⁵

3 Research and data focused on equal access to public services in the digital age

The Ombudsman does not collect data on the number of complaints related to discrimination on the ground of old age in the context of access to public services. In 2021, the Ombudsman registered a total of 17 complaints related to discrimination. The majority of them were related to the issuance of the digital COVID-19 certificate, the criteria for enrolment of children in kindergartens, the introduction of electronic voting, the lack of accessible architectural environment for persons with disabilities, the implementation of distance learning in schools and the equal treatment of Roma.¹⁶

The National Statistical Institute (NSI) (*Национален статистически институт*, НСИ) publishes annual statistical data on the use of information technologies in Bulgaria. According to the data for 2021, the share of persons aged between 65 and 74 years, who regularly use the internet (every day or at least once a week), is 30.8 % vis-à-vis 18.5 % who use the internet more often (several times during the day) and 50.6 % who have never used the internet.¹⁷ The share of regular users of the internet among older persons has increased from 12.9 % in 2016 to

¹⁴ Kolarska, D. (2020), 'A1 trained older people to use the internet and new technology' (*'A1 обучи възрастни хора да боравят с интернет и да си служат с технологиите'*), *A1 Blog*, 14 January 2020.

¹⁵ For more information, see the [project website](#).

¹⁶ Bulgaria, Ombudsman of the Republic of Bulgaria (*Омбудсман на Република България*), Annual report of the Ombudsman 2021 (*Годишен доклад на Омбудсмана 2021*), 8 April 2022, pp. 223-234.

¹⁷ Bulgaria, National Statistical Institute (*Национален статистически институт*) (2021), [Information and communication technologies usage in households and by individuals in 2021](#), Sofia, National Statistical Institute, press release, 10 December 2021.

30.8 % in 2021 but remains much lower than the share of regular users among the entire population (73.9 % in 2021).¹⁸ The share of people using the internet for interacting with public authorities in 2021 was 26.6 %, but data disaggregated by age are not publicly available.¹⁹ The data on the use of information technologies are based on an annual sample survey, which is part of the European Community Statistical Programme. The methodology and the statistical tools are completely harmonised with Eurostat requirements.

In 2021, the non-governmental organisation Catro Bulgaria published a research report on the digital competencies for e-government in five European countries, including Bulgaria. The study was produced in the framework of an EU-funded project aimed to equip disadvantaged adults with the skills necessary for using the most common e-government and e-commerce services in their countries. The sections on Bulgaria are mostly based on official statistics and the results of the Digital Economy and Society Index (DESI). Based on these data, the study concludes that in Bulgaria, the groups most widely excluded from the digital world are older persons, persons with lesser educational status, and economically inactive persons. The report also notes that, of the five countries covered by the research, Bulgaria and Cyprus have the highest proportion of digitally excluded citizens and the least to offer on the training and support side.²⁰

In 2017, the National Centre for Parliamentary Studies (NCPS) (*Национален център за парламентарни изследвания*, НЦПИ) published a study on the attitudes toward public administration and administrative services. The study was based on a national representative survey among 1,000 adult individuals in 86 locations across the country, conducted through semi-structured face-to-face interviews in the period 6-17 July 2017. According to the study, 5.1 % of the respondents aged 59 years and over had used and were still using electronic administrative services, 1.0 % had used such services but were no longer using them, 14.8 % had not used such services because the procedures were complicated, 57.2 % had not used such services because they had no need to, and 21.9 % had not used such services because they did not know about them. According to the same group of respondents (aged 59 years and over) the main problems preventing the use of electronic administrative services were concerns related to personal data protection (26.4 %), the lack of uniform mechanism for providing different services (20.8 %), the access requirements (24.1 %), the registration procedure (22.0 %), the lack of computer literacy (48.8 %), the requirements for a specific operation system (9.5 %), the need to have access to

¹⁸ Bulgaria, National Statistical Institute (*Национален статистически институт*) (2021), [Individuals regularly using the internet](#), Sofia, National Statistical Institute, 10 December 2021.

¹⁹ Bulgaria, National Statistical Institute (*Национален статистически институт*) (2021), [Individuals using the internet for interacting with public authorities](#), Sofia, National Statistical Institute, 10 December 2021.

²⁰ Zlatanov, D. (2021), [Digital competencies for e-government: transnational research report](#), Sofia, Catro Bulgaria, 21 March 2021.

internet (30.7%), the lack of integrated services (7.7 %), the impossibility to forward the obtained electronic document (8.7 %), the lack of an option to pay for the service by card (6.6 %), and the high price of some services (5.3 %). In terms of what was necessary to get people using electronic administrative services, the respondents aged 59 years and over pointed that the services should be provided quickly (30.4 %), that they should be cheap or free of charge (36.7 %), accessible (22.9 %), organised according to the actual needs of users (10.5 %), integrated (7.3 %), that the security and reliability of data should be ensured (21.1 %), and that a national system for access to the services should be created (13.6 %). The share of people aged 59 years and over, who did not know what needed to be done to increase the use of electronic services (43.8 %), was the highest among all age groups and much higher than the total share of all respondents (18.4 %).²¹

Private telecommunications companies are occasionally conducting surveys on the use of internet, including by older persons. According to one such survey among 2,600 persons, conducted in 2018 by a private survey company for the mobile operator Telenor, 66 % of the population aged between 55-64 years and 28 % of those aged 65 years and over possessed a smartphone (compared to 51 % and 21 % in 2017).²²

²¹ National Centre for Parliamentary Studies (*Национален център за парламентарни изследвания*) (2017), Public attitudes towards the public administration and the provided administrative services (*Обществени нагласи към държавната администрация и предлаганите административни услуги*), Sofia, National Centre for Parliamentary Studies, 17 July 2017.

²² TechNews.bg (2018), 'Smartphones penetrate rapidly in the 55+ age group' (*'Смартфоните проникват бързо във възрастовата група 55+'*), 22 February 2019.

4 State of digitalisation of selected public services

Access to digital health records is provided through two different channels. The first option is through the [National Health Information System](#) of the Ministry of Health (MH) (*Министерство на здравеопазването, МЗ*) which requires a valid qualified electronic signature. The second option is through the [Personalised Information System](#) of the National Health Insurance Fund (NHIF) (*Национална здравноосигурителна каса, НЗОК*), which allows three alternative identification methods: a valid qualified electronic signature, a unique access code issued by the local health authorities, or a personal identification number issued by the National Revenue Agency (NRA) (*Национална агенция за приходите, НАП*). Both systems provide access to information but do not allow for completing transactions online. The [Personalised Information System](#) of the National Health Insurance Fund (NHIF) (*Национална здравноосигурителна каса, НЗОК*) used to provide the possibility to change GP online, but this functionality is no longer available. The [National Health Information System](#) of the Ministry of Health (MH) (*Министерство на здравеопазването, МЗ*) is supposed to enable more transactions online, but these are expected to become available by the end of 2022.²³

The services related to public statutory pensions and social benefits are fully digitalised and are accessible through the single portal for access to electronic administrative services [eGov.bg](#). For both services, information is available online and transactions are also possible online. For each service, the portal provides (1) information about the necessary documents, (2) downloadable templates of applications and other supporting documentation, (3) information about alternative ways to conduct transactions (online and offline), (4) contact details of the administrative offices where the service is accessible offline, (5) information about the deadlines and the fees, and (6) an option to directly complete the transaction online.

Selected public services relevant for older persons					
		Access to health records	Public statutory pensions	Social benefits	Other (as relevant in your context)
	Not digitalised (Y/N)	N	N	N	

²³ Popova, E. (2022), 'E-health: does it pose risks for villages' (['E-здравеопазване: крие ли рискове за селата'](#)), *bTV*, 22 May 2022.

Stage of digitalisation	Information is available online (Y/N)	Y	Y	Y	
	Transactions are possible online (Y/N)	N	Y	Y	
Recognition of groups at risk of digital exclusion	Service specific regulation recognises barriers to digital inclusion / vulnerable and disadvantaged groups (Y/N).	N	N	N	
	If yes , please list the barriers and groups that are mentioned.	-	-	-	
Multichannel access options	Telephone service (Y/N) If yes , please describe what kind of personalised services it provides.	N	Y Providing information / answering questions	Y Providing information / answering questions	
	Physical administrative access points (Y/N). If yes , please specify the level of availability (local, regional, national), the opening days and hours.	Y Local level (general practitioners' offices)	Y Local (district) level / standard working hours (working days, 8:00 a.m. – 4:30 p.m.)	Y Local (municipal) level / standard working hours (working days, 9:00 a.m. – 5:30 p.m.)	
	Specific locations that facilitate offline access to the service (Y/N) If yes , indicate the location(s). Please describe what kind of support is provided.	N	Y Post offices / payment of pensions to persons without bank accounts	N	

	<p>Specific locations that facilitate online access to the service (Y/N).</p> <p>If yes, indicate the location(s).</p> <p>Please describe what kind of support is provided.</p>	N	N	N	
	<p>Other – please indicate any other access channels to the service.</p>	N	N	N	
<p>Other forms of support for online use</p>	<p>Please indicate any other form of support to facilitate the use of the online service for older persons such as easy-to-read versions, different language versions, etc.</p>	N	N	N	