

SUMMARY

Analysis of the draft *Integrated Territorial Strategies for the Development of Level 2 Planning Regions in Bulgaria* to find out their relevance to the needs of the local Roma communities

2022

Purpose and methodology of the study

The National Strategy of the Republic of Bulgaria for Equality, Inclusion and Participation of the Roma (2021 - 2030) states that the integration of the Roma community for the period 2021-2027 will be implemented throughout three approaches: targeted, mainstream and territorial. The territorial approach, according to the Strategy, will be implemented through "Integrated Territorial Investments - ITI" in Level 2 regions and the "Community-Led Local Development - CLLD" approach. The document highlights the importance of the two territorial approaches for the realization of specific objective 8 of the ESF+ Regulation: "Promoting the socio-economic integration of marginalized communities such as the Roma", as well the opportunity for funding local measures in places "that have the greatest need in relation to the specific profile of the population of the respective territory"¹.

This report aims to establish the level of cohesion between the objectives and measures of the six integrated territorial development strategies/ITDS/ of the level 2² regions within which the ITI will be implemented, and the identified needs, priorities and measures of the Roma communities from municipalities included in the ROMACT Programme.

ROMACT Programme³ is a Joint Programme of the European Commission and the Council of Europe, which has been implemented in Bulgaria since 2013. The Programme aims to increase the

¹ National Strategy of the Republic of Bulgaria for equality, inclusion and participation of the Roma 2021-2030, section IX, page 41: <https://nccedi.government.bg/bg/node/448>

² ITDS were developed in accordance with the requirements of the Regional Development Act (RDA) and in accordance with the requirements of the Regulation (EU) No. 1303/2013 Pursuant to Art. 4, para. 3 of the RDA (Supplement - SG No. 21 of 2020, in force from 13.03.2020) The regions forming level 2 are planning regions that are not administrative-territorial units and have a territorial scope, as follows: 1. Northwest region, including the districts of Vidin, Vratsa, Lovech, Montana and Pleven; 2. North central region, including the regions of Veliko Tarnovo, Gabrovo, Razgrad, Ruse and Silistra; 3. Northeast region, including the districts of Varna, Dobrich, Targovishte and Shumen; 4. Southeast region, including the regions of Burgas, Sliven, Stara Zagora and Yambol; 5. (suppl. - SG No. 21 of 2020, in force from 13.03.2020) Southwest region, including the districts of Blagoevgrad, Kyustendil, Pernik, Sofia and Sofia-city (Capital Municipality); 6. South central region, including the districts of Kardzhali, Pazardzhik, Plovdiv, Smolyan and Haskovo.

³ <https://coe-romact.org>

political will and the involvement and participation of the local stakeholders in the process of developing better inclusive policies targeting disadvantaged communities.

In order to support the municipalities to develop more relevant local plans, the ROMACT Programme has developed and put in practice its own tool for gathering empirical data on the needs of marginalized communities. This tool includes the participation of representatives of the local Roma communities. In the next step, ROMACT experts summarize the collected data and develop an analyses of the needs of the Roma communities.

In the implementation of the present task, a review and comparative analysis was made between the goals and measures of the priorities of the six draft ITDSs (versions from October 18, 2021) and the analyses of the needs of the Roma community from municipalities participating in the ROMACT Programme.

At the time of the research, the ROMACT Programme in Bulgaria was working actively in 15 municipalities. Another group of 41 municipalities already applied the full ROMACT cycle and approach, and demonstrated good practices in the field. Among the number of total 56 municipalities, 12 municipalities are eligible and have the opportunity to benefit from ITI independently and separately from other administrative units. These municipalities are: Aytos, Botevgrad, Velingrad, Vratsa, Dimitrovgard, Dobrich, Petrich, Peshtera, Samokov, Sliven, Targovishte, and Shumen.

In addition to these, the analysis also takes into account the needs of some smaller municipalities such as: Belogradchik, Knezha, Mezdra, Perushtitsa, Razlog, Rakovski, Ruzhintsi, Yablanitsa, Isperih, Kameno, Sredets, Sungurlare, Varbitsa, Kaolinovo, Veliki Preslav , Tsenovo, Antonovo, Tvarditsa and Gurkovo - given that they could be included in the cluster municipalities eligible for ITI.

Correspondence between the ITDS and the assessment of the needs of the local Roma communities

The Integrated Territorial Development Strategies (ITDSs) are medium-term strategic documents. They determine the planning of the economic, territorial and thematic development of regions within the new programming period (2021-2027). The ITDSs provide for the financing of concepts for integrated territorial investments/ITIs/, which are aimed at territories with common characteristics and/or potential for development and include the most appropriate combination of resources and measures to be used purposefully to achieve a specific goal or priority. ITIs are limited in their scope and the decisions for implementing investments are supposed to be done mainly by the 40 municipalities defined under priority axis 2 of the Program for Regional Development /PRD/. However, the logic of forming clusters and partnerships does not exclude

urban municipalities from entering into partnerships with the remaining 216 rural municipalities, and this possibility has also been taken into account when preparing the analysis.

In relation to the needs of the Roma communities, targeted by the ROMACT Programme in the partnering municipalities, it can be concluded that the ITDS measures in the field of Education meet the identified needs of the Roma in general.

The situation, however, is different in the other priority areas for the Roma community.

In the field of health care, there are significant gaps in all ITDSs, and there are no measures planned for addressing the following problems and needs:

- High share of people with no health insurance from communities living in marginalization;
- High levels of infant and maternal mortality in regions with a high proportion of Roma population;
- Insufficient number of health mediators and lack of resource for their activities;
- Insufficient health prevention, especially among children and adults from marginalized communities;
- Difficulties in compulsory immunization of children, especially in highly mobile social groups and in marginalized neighborhoods lacking primary medical practices;
- Discrimination of Roma patients in the health care system.

In terms of infrastructure, housing and environment, the ITDS does not provide for measures to solve the main problems of the Roma communities, such as:

- Extremely poor living conditions⁴ for over 60% of the Roma: overcrowded housing, houses with leaky roofs, with damp and mold on the walls and floors, no running water and no indoor toilets;
- Highly depreciated or completely missing street infrastructure in Roma neighborhoods;
- Old or completely missing water and sewage systems;
- Lack of street lights;
- Lack of sidewalks and asphalt/pavement;
- Lack of organized and equipped spaces for recreation, relaxation, games and sports, such as - children's and sports grounds, parks, gardens, etc.;

⁴ These needs are confirmed by the data of a large-scale study by NSI and FRA, conducted within the framework of the project "New approaches to collecting data in hard-to-reach population groups exposed to the risk of violation of their rights", Thematic report on the situation of the Roma. According to them, 65.8% of Roma live in housing deprivation (in a very dark apartment or in a dwelling with a leaky roof, damp walls and floor, no bathroom, no indoor toilet; 71.5% of Roma live in overcrowded housing, and 49% report dirt or other environmental problems in neighbourhoods and (smoke, dust, unpleasant smells): <https://bit.ly/3V2pY64>

- Informal houses with an unsettled status, being the only homes of the families, are at risk of being demolished, thus making thousands of children and adults homeless;
- There is an urgent need for legalization and neighborhood regulations or opportunities to allocate land for new residential constructions;
- Informal dumps and cemetery parks;
- Large populations of stray dogs in Roma neighborhoods;
- Polluted air due to heating with wood/coals or waste burning.

In regard to social services and the labor market, the planned measures and activities in the ITDSs are primarily tailored for people with permanent physical difficulties and people in the third age. There is a lack of measures to prevent and combat poverty, marginalization and discrimination in the neighborhoods, such as the needs identified within ROMACT:

- Community centers to foster community development and to increase its capacity to counteract anti-Roma attitudes and discrimination, as well as providing educational and cultural services inclusive of young people who dropped out of school earlier. Integrated social and health services in the community, including services such as public laundry, bathroom, kitchen for children, etc. in marginalized neighborhoods that lack running water and electricity;
- Social enterprises for people who lost their motivation to work and for those long-term unemployed; especially for Roma women, who, in addition to the support to acquire professional skills within a social economy enterprise, could also receive support for social inclusion.

Conclusions and recommendations

ITDSs are written in a highly general manner. They use bureaucratic clichés and euphemisms in a formulaic way, and all the strategies considered in their objectives, measures and activities seem plagiarized from each other, although the analytical parts highlight well some regional specificities. **Roma communities and informal neighborhoods with concentrations of poverty are absent from regional development interventions**, although ITIs offer significant opportunities to improve their living conditions and human capital development.

On the other hand, the National Strategy of the Republic of Bulgaria for Equality, Inclusion and Participation of the Roma 2021-2030 is expected to be funded mainly through the European funds and programs, a large part of which will be provided through ITDS. Therefore, it is very important that the priorities, goals and measures in the ITDS correspond to the measures in the municipal plans for the implementation of the National Strategy for Equality, Inclusion and Participation of the Roma.

Unfortunately, the review clearly shows that the problems of the Roma communities are not a subject of a comprehensive analysis in ITDSs. Only part of the issues under the sphere of education are explicitly addressed, which are the same for all strategies, i.e. that Roma children have the lowest rate of coverage and enrollment in pre-school education and that the integration of Roma in the education system lags behind. Accordingly, in all ITDSs, priorities and measures for the Roma communities are mainly provided in the field of education. In the remaining directions, there are measures which, without being explicitly aimed at vulnerable Roma communities, could meet some of their needs and address some of their problems - for example: measures to provide municipal housing and improve infrastructure; measures to improve access to health and social services in remote areas, and areas with difficult access, etc. **However, the lack of specificity in these measures cannot guarantee that they will reach the most needy marginalized groups**, and it is highly unlikely that their problems will fall within the scope of the ITI concepts developed by the municipalities.

In general, ITDSs do not address problems of vulnerable communities exposed to the risk of poverty, including vulnerable Roma communities. This is so, despite the fact that in the Socio-Economic Analysis of Regions in the Republic of Bulgaria⁵ (commissioned by the Ministry of Regional Development and Public Works - MRDPW), it is explicitly stated that one of the main priorities of the state is the reduction of poverty in all its forms. The analysis of MRDPW highlights: a much higher risk of poverty in rural and sparsely populated areas; an increased risk of poverty in Roma communities; insufficient and limited progress in providing quality inclusive education for Roma children; difficulty in accessing for many Roma to quality health and social services and their absence from the labor market; deteriorating housing conditions; problems with construction and maintenance of the infrastructure; social isolation, etc. There are, also, cited data on regions and settlements in Bulgaria with a greater concentration of Roma communities, as well as information on significantly higher levels of poverty among Roma in Bulgaria. In part two of the Socio-Economic Analysis of Regions in the Republic of Bulgaria, page 34, it is stated that: "In 2020, the highest relative share of the poor among persons who self-identified themselves as members of the Roma ethnic group was 66.2%. Most Roma are unemployed, inactive or the so called "working poor". Nearly 70% have either primary or no education. About 7% of the Roma children between the ages of 7 and 15 remain outside the education system and many of younger children are not enrolled in kindergartens. Effective mechanisms are needed for the active inclusion of the Roma in the educational system, as well as in the economic and social life of the country."

In the field of social inclusion and the socio-economic integration of vulnerable groups, including the Roma, in the first part of the Socio-Economic Analysis on page 151, a need has been identified

⁵ Socio-economic analysis of regions in the Republic of Bulgaria, fourth stage, 2021, Contracting authority: Ministry of Regional Development and Public Works, Contractor: National Center for Territorial Development EAD, Contract No. RD-02-37-76/30.07.2018.

for: “Developing active inclusion measures to improve the employability of vulnerable groups through integrated support; improving the access of vulnerable groups, including Roma, to targeted support for active inclusion and basic services, as well as developing measures to overcome prejudice and "housing" discrimination; social housing for people at risk of poverty or social exclusion; improving the quality and availability of integrated social services through assessment of individual needs”.

Based on the review of ITDS, the Analysis of Community Needs in the Municipalities partnering with ROMACT and the findings of the Socio-Economic Analysis of Regions in the Republic of Bulgaria, we propose the following recommendations:

1. Make the priorities, goals and measures of ITDS coherent to the planned measures in the Plans for Integrated Development of Municipalities (PIDM) and the municipal plans for the implementation of the National Strategy for Equality, Inclusion and Participation of the Roma 2021-2027.
2. Identify and include in the functional zones of social orientation **specific marginalized and segregated territories** with a higher concentration of poverty and social exclusion, with poor housing conditions, including those located outside of regulation, with informal but single dwellings of families. These territories should be determined on the basis of a socio-economic assessment of the specific territory, and not only on the basis of the assessment of the socio-economic status of the municipality as a whole.
3. Plan **integrated measures relevant to local needs** for improving housing conditions in neighborhoods with a concentration of poverty, including residential areas outside of regulation, as well as the informal houses in them. Measures need to include, but are not limited to: developing general and detailed development plans for the neighborhoods; construction/repairing the water and sewage installations; repairing and asphaltting streets; constructing sports grounds, playgrounds, parks and gardens; allotting land/parcels for new legal residential constructions; creating supportive housing repair schemes; developing projects for energy efficiency of houses and for providing clean energy; constructing social housing for families with children and/or with elder and sick family members; constructing community and socio-cultural centers, youth clubs; providing communal services in the neighborhoods - regular garbage collection, cleaning and cultivation of landfills located near the neighborhoods, etc.
4. Provide vulnerable communities with access to **integrated social, health, educational, cultural and employment services**. Measures may include, but are not limited to:
 - Appoint health and educational mediators, community and social workers and provide them with trainings and resources for their effective work; organize

afterschool study rooms in the community for children who lack suitable places for studying and entertaining in their homes; provide food for children from poor families in school and out of school; launch a children's kitchen for children aged 0-3 and provide freshly cooked food for them; provide public laundries and bathrooms in neighborhoods where many households do not have running water and/or bathrooms; provide patronage with obstetric/nursing and pediatric care in marginalized neighborhoods; create telemedicine for elderly/sick people from marginalized neighborhoods;

- Conduct professional courses tailored to individual goals and the regional labor market; support youth from vulnerable communities to complete secondary and higher education, through scholarships and additional tutoring classes to prepare for state exams and university exams; launch and develop social enterprises, tailored to the local and regional economy and the opportunities to connect with the national economy;
 - Support for organizing and conducting cultural and community activities; for building the community's capacity to combat discrimination and racism and for developing civil structures and establishing networks and partnerships with civil society structures, etc.
5. Ensure the **participation of Roma** in the process of planning, implementation and monitoring/evaluation of regional strategies and plans; provide for appropriate capacity building measures through trainings and ongoing coaching by organizations with suitable profiles and expertise.
 6. Give preferences to ITI Concepts of municipalities that include in their functional zones with a social orientation **specific marginalized and segregated territories** with a higher concentration of poverty and social exclusion and which already have appropriate analyses of local needs and measures to address them.
 7. Provide access for small rural municipalities with a municipal center-town of up to 15,000 inhabitants to the ITDS measures; set up clearer procedures for the partnerships of the 40 municipalities that have the right to prepare concept papers for ITI and small municipalities; give preferences for the ITI Concepts of municipalities that make partnerships with small municipalities and have measures for vulnerable communities (for example by giving more points in the evaluation).