

Key social inclusion and fundamental rights indicators in Bulgaria

Using data in the policy process

This report summarises the results of a large-scale survey conducted as part of the project 'Novel Approaches to Generating Data on hard-to-reach populations at risk of violation of their rights'. The project was funded by the European Economic Area and Norwegian Financial Mechanism programme under call BGLD-3.001, 'Local development, poverty reduction and enhanced inclusion of vulnerable groups'.

Authors: Dimitar Markov, Andrey Ivanov, Prof Ilona Tomova, Dr Lyubomir Stoychev, Delyana Doseva, Maria Doichinova, Rosalina Todorova

This report was drafted as part of the project 'Novel approaches to generating data on hard-to-reach populations at risk of violation of their rights', funded by the European Economic Area and Norwegian Financial Mechanism programme, call BGLD-3.001, 'Local development, poverty reduction and enhanced inclusion of vulnerable groups'. The National Statistical Institute of Bulgaria and the European Union Agency for Fundamental Rights (FRA) developed the survey tool and defined the list of indicators. The National Statistical Institute of Bulgaria calculated the indicators. The Centre for the Study of Democracy (FRA's Franet partner in Bulgaria) put together the first draft. FRA checked the indicators and provided comments and edits in various stages of drafting.

Contents

- Introduction..... 4
- 1. Roma..... 5
 - 1.1. Policy framework 5
 - 1.2. Background data and indicators 5
 - 1.3. Indicators for monitoring and evaluation 5
 - 1.4. BNSI/FRA survey data 6
- 2. Children 8
 - 2.1. Policy framework 8
 - 2.2. Background data and indicators 8
 - 2.3. Indicators for monitoring and evaluation 9
 - 2.4. BNSI/FRA survey data 9
- 3. Older persons 11
 - 3.1. Policy framework 11
 - 3.2. Background data and indicators 11
 - 3.3. Indicators for monitoring and evaluation 12
 - 3.4. BNSI/FRA survey data 12
- 4. Persons with disabilities 14
 - 4.1. Policy framework 14
 - 4.2. Background data and indicators 15
 - 4.3. Indicators for monitoring and evaluation 15
 - 4.4. BNSI/FRA survey data 15
- Conclusions and recommendations 17

Introduction

This report follows the series of five thematic reports,¹ developed as part of the project BGLD-3.001-0001, ‘Novel Approaches to Generating Data on hard-to-reach populations at risk of violation of their rights’. The project is funded by the European Economic Area Financial Mechanism 2014–2021 under the programme ‘Local development, poverty reduction and enhanced inclusion of vulnerable groups’, and is implemented in partnership between the National Statistical Institute of Bulgaria (BNSI) (*Национален статистически институт, НСИ*) and the European Union Agency for Fundamental Rights (FRA). The main goal of the project is to provide data for key national, international and EU indicators on social inclusion and related fundamental rights, covering the general population and specific vulnerable groups at risk of social exclusion and violation of fundamental rights.

These data are intended to be used to inform the planning of appropriate social policy measures and the development of target indicators for the operational programmes of the European Structural and Investment Funds. Moreover, the indicators populated with data from a survey conducted by the BNSI can serve as a baseline for assessment of progress in important policy areas, such as the UN Sustainable Development Goals, the European Pillar of Social Rights and the new EU Roma strategic framework for equality, inclusion and participation. Other Member States facing similar social and economic challenges may also benefit from the outputs of the project and the experience gained during it.²

The BNSI conducted a nationally representative survey of households between 19 May 2020 and 17 September 2020. During the previous stage of the project, the analysis of the survey results specifically focused on the four groups identified as being at high risk of poverty, social exclusion and violation of fundamental rights: the Roma community (people who self-identify as Roma), children (people below the age of 18 years), older people (people aged 65 years and over), and people with disabilities (people who answered that they had been limited or severely limited in the activities they usually do in the past 6 months owing to health problems).

The purpose of this thematic report is to summarise the experience from the project and the lessons learned in regard to generation of data on the situation of the respective vulnerable groups and using data for populating indicators to inform the policies for addressing vulnerability in respective areas.

The report is divided into four chapters, one for each of the identified groups at risk of poverty, social exclusion and violation of fundamental rights. Each chapter analyses the policy framework relevant for the particular group focusing on the data and indicators used either as background data or as tools for monitoring the progress of its implementation. This analysis is followed by an overview of the extent to which the data and indicators generated by the BNSI/FRA survey can be used in the process of implementing these policy frameworks and evaluating their impact.

¹ The five thematic reports are on the situation of Roma, children, older people and people with disabilities, and a general report on the key social inclusion and fundamental rights indicators in Bulgaria.

² For more information, see the project’s [website](#).

1. Roma

1.1. Policy framework

The main document that frames Bulgaria's **policy on Roma** is the National Strategy of the Republic of Bulgaria for Roma Equality, Inclusion and Participation 2021-2030 (*Националната стратегия на Република България за равенство, приобщаване и участие на ромите 2021-2030*).¹ It was adopted after three rounds of public consultations after each of which the document was substantially revised. The strategy is to be implemented through short-term action plans, the first of which covers the period until 2023.² The strategy explicitly states that, following the European Union (EU) framework for national Roma strategies, the name "Roma" is used as an umbrella term for both Bulgarian citizens in a vulnerable socio-economic situation who self-identify as Roma and citizens in a similar situation who are perceived as such by the surrounding population, regardless of how they self-identify.

The strategy is aimed to achieve equality, inclusion and participation of vulnerable ethnic groups and communities such as Roma in all spheres of society for the successful and sustainable development of Bulgarian society. It pursues the **strategic goal** to create conditions for equality, inclusion and participation of Roma by ensuring access to rights, goods and services, and participation in all spheres of public life in compliance with the principles of the rule of law and non-discrimination.

The strategy further identifies **horizontal and sectoral objectives** as well as **priority areas**. The six priority areas are (1) education and training, (2) healthcare, (3) employment, (4) housing, (5) rule of law and anti-discrimination, and (6) media and culture. For each priority area, the strategy defines operational and general objectives and lists the Sustainable Development Goals to which the measures under that priority will contribute.

1.2. Background data and indicators

The strategy has an extensive **background section** which analyses the situation and problems of the Roma population in Bulgaria. The analysis refers to **empirical data from different sources** including administrative data from official registers (e.g., number of unemployed persons registered in labour offices), statistical data from BNSI and Eurostat (e.g., life expectancy, mortality, economic activity, unemployment, etc.), survey data from the European Union Statistics on Income and Living Conditions (EU-SILC) (e.g., at-risk-of-poverty rate), etc. There are also references to data collected and published by FRA, including the report on the situation of Roma in education in 11 EU Member States (data on Roma segregation in schools)³ and the results from the Second European Union minorities and discrimination survey (EU-MIDIS II) (data on employment and discrimination).⁴

1.3. Indicators for monitoring and evaluation

According to the strategy, the monitoring of its implementation is based on an **indicator model**, which includes a **list of indicators**, a definition and a methodology (algorithm) for the generation, collection, processing and analysis of primary data for calculating the indicators. For each indicator, the strategy defines a **baseline** and a **measurable target**. The document also envisages that, along with the general statistical approaches, data on the implementation of the strategy should be collected on the **territorial level**, in particular for settlements and parts of settlements with concentrations of poverty, illegal construction and other relevant factors.

The list of monitoring and evaluation indicators is included in the strategy as an annex. It consists of a total of **24 indicators**. For each indicator, there is a baseline (most often referring to 2020), a target, a reference to the EU average (if such information is available), an indication of the source of data

collection, and a note on whether data collection by ethnicity is possible. For the majority of the indicators, the baseline data comes from statistics and survey data collected by BNSI. The only two indicators, for which the data is not collected by BNSI are the Human Development Index (HDI) of the United Nations (UN) and the share of teachers who feel well or very well prepared for teaching in a multicultural or multilingual setting according to the Teaching and Learning International Survey (TALIS) of the Organisation for Economic Co-operation and Development (OECD).

1.4. BNSI/FRA survey data

In the National Strategy of the Republic of Bulgaria for Roma Equality, Inclusion and Participation 2021-2030, **the BNSI/FRA survey results are used as a baseline** for three of the monitoring indicators. For each of them, the strategy also sets a target to be achieved by 2030. These indicators are:

- share of Roma aged 16 years and over who felt discriminated against in the past 12 months in any of the areas covered by the survey (baseline: 17.9 % in 2020 according to the BNSI/FRA survey; target for 2030: reducing the share by half);
- share of Roma aged 16 years and over who felt discriminated against (in any area of life) in the past 12 months and reported the last incident of discrimination (baseline: 8.0 % according to the BNSI/FRA survey; target for 2030: increasing the share twice);
- share of children aged 6-14 years from households where at least one member self-identifies as Roma attending schools in which “all or most of schoolmates are Roma” (baseline: 58.0 % according to the BNSI/FRA survey; target for 2030: less than one of every five Roma children).

Some of the other indicators in the strategy are also part of the BNSI/FRA survey, although other sources are used as a baseline in the strategy (mostly EU-SILC). These include the share of people at risk of poverty, the share of children under 18 years at risk of poverty, the share of young people aged 15-29 years who are not in education, employment or training (NEET), and others. For these indicators, the BNSI/FRA survey can be used to provide additional information and/or fill some gaps in the data collection.

Thus, for example, according to the strategy, in 2020, the share NEET in Bulgaria was 18.1 % vis-à-vis an EU average of 13.7 % (according to data from the European Union Labour Force Survey). Against this baseline, the target set in the strategy for 2030 is for Bulgaria to reach the EU average. The baseline suggested by the strategy, however, refers to the share of NEET among the entire population. The BNSI/FRA survey, according to which the share of NEET in 2020 was 19.3 %, provides data disaggregated by self-declared ethnicity and according to this data share of NEET among persons who self-identify as Roma was much higher than the average (53.6 %). Further disaggregation of the data generated by the survey shows that the share of NEET among Roma women (69.8 %) is much higher than among Roma men (39.5 %), as is among the Roma who do not use a personal computer or tablet (63.7 %) than among those who do (33.9 %). As illustrated by this example, the BNSI/FRA survey can contribute to both the interpretation of the baseline (for the indicators that use the entire population for defining the baseline) and for the identification of specific groups within the Roma population that are further away from reaching the target and might be in need of more intensive support.⁵

Finally, the BNSI/FRA survey, in combination with data from other sources, allows for generating data for some of the strategy indicators referring specifically to the population living in marginalised conditions, which outsiders perceive as Roma neighbourhoods. Thus, for example, if the indicator of the share of NEET is applied by combining different datasets, the results show that the share of NEET among the Roma population living within (59.6 %) and outside (51.7 %) Roma neighbourhoods is higher

than the same shares among the ethnic Turkish (28.8 % and 22.2 %, respectively) and ethnic Bulgarian (24.4 % and 11.4 %, respectively) population.⁶

¹ Bulgaria, Council of Ministers (*Министерски съвет*) (2022), National Strategy of the Republic of Bulgaria for Roma Equality, Inclusion and Participation 2021-2030 ([Национална стратегия на Република България за равенство, приобщаване и участие на ромите 2021-2030](#)), 5 May 2022.

² Bulgaria, Council of Ministers (*Министерски съвет*) (2022), National Action Plan for the Period 2022-2023 for the Implementation of the National Strategy of the Republic of Bulgaria for Roma Equality, Inclusion and Participation 2021-2030 ([Национален план за действие за периода 2022-2023 г. за изпълнение на Националната стратегия на Република България за равенство, приобщаване и участие на ромите 2021-2030](#)), 5 May 2022.

³ FRA (European Union Agency for Fundamental Rights) (2014), [Education: the situation of Roma in 11 EU Member States. Roma survey – Data in focus](#), 11 September 2014.

⁴ FRA (European Union Agency for Fundamental Rights) (2016), [Second European Union Minorities and Discrimination Survey Roma – Selected findings](#), 29 November 2016.

⁵ For the full set of indicators and the survey results for Roma, see Tomova, I. and Stoychev, L. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on Roma, Sofia, National Statistical Institute.

⁶ For the methodology to combine the datasets and the obtained results, see Tomova, I. and Stoychev, L. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on Roma, Sofia, National Statistical Institute.



2. Children

2.1. Policy framework

Bulgaria has no effective **policy document on children's rights** since the expiry of the National Child Strategy 2008-2018 (*Национална стратегия за детето 2008-2018*). A new National Child Strategy 2019-2030 (*Национална стратегия за детето 2019-2030 г.*)¹ was drafted by the government but subsequently withdrawn after public protests and a heated political debate.² The draft strategy defines its target group in compliance with the definition of a child according to the United Nations (UN) Convention on the Rights of the Child (every human being below the age of eighteen years). In addition to that, the document is based on the concept of the life cycle of children, which is divided into three periods: early childhood (0-6/7 years), childhood and early adolescence (7-13 years) and adolescence (14/15-18 years).

The draft strategy's main **goal** is to ensure that every child in Bulgaria, at every stage of their childhood, lives and develops their potential in an integrated healthy, safe and development-promoting environment that guarantees their rights and well-being, with the support of parents and professionals caring for children. To achieve this goal, the draft strategy defines five **key areas of intervention**: (1) health and healthy lifestyle; (2) quality education for all children; (3) family environment, alternative care and standard of living; (4) safe environment and access to justice; and (5) recreation, leisure and daily life.

In each area of intervention, the draft strategy pursues five **strategic objectives**: (1) ensuring maternal and child health and promoting healthy lifestyles and health culture; (2) ensuring that every child has access to quality education and care at every stage of the life cycle and acquires the skills and competencies to participate fully in society; (3) improving the standard of living of every child and ensuring their right to live in a supportive family or family-like environment; (4) ensuring the right of every child to live in a safe environment; prevention and protection from violence and other harmful acts and effective access to justice; and (5) ensuring opportunities for children to participate in decision-making on matters affecting them, and access to play, sports, cultural and other activities that support their development and form their civic competencies.

Until the adoption of the new national child strategy, the national policy framework is shaped by **other strategic documents** that are not specifically aimed at children but nevertheless address certain aspects of their lives. One such document is the National Strategy for Poverty Reduction and Promotion of Social Inclusion 2030 (*Национална стратегия за намаляване на бедността и насърчаване на социалното включване 2030*),³ which refers to children as one of its priority groups and is aligned with the European Child Guarantee.

Finally, despite the lack of an effective national policy document on children, Bulgaria remains bound by its commitments under other instruments in the area of children's rights such as the EU Strategy on the Rights of the Child,⁴ the European Child Guarantee,⁵ the UN Sustainable Development Goals (SDGs) and the observations and recommendations of the UN Committee on the Rights of the Child.

2.2. Background data and indicators

The **background section** of the draft National Child Strategy 2019-2030 includes an overview of the main conclusions of the SWAT analysis and the ex-post impact assessment of the previous strategy and an **assessment of the current situation with references to empirical data**. The empirical data referred to in the assessment comes from various sources including official statistics (e.g., on the number of child victims of crime), the European Union Statistics on Income and Living Conditions (EU-SILC), the Human Development Index (HDI), the European School Survey Project on Alcohol and Other Drugs

(ESPAD), etc. For some of the data quoted in the assessment, the draft strategy mentions the target, which Bulgaria is bound to achieve according to its international commitments (e.g., according to the document, the group net enrolment rate of children in kindergartens for the 2017/2018 school year was 78.4 % vis-à-vis a national target of pre-school education coverage of 90 %).

2.3. Indicators for monitoring and evaluation

The draft strategy provides for its **monitoring and evaluation mechanisms** to be part of a separate **roadmap** to be developed and adopted within six months after the adoption of the strategy. According to the strategy, the monitoring should be based on a **framework of baseline indicators** and targets for the expected results disaggregated by sex, age and other relevant categories. The draft strategy also envisages that, for the successful achievement of its goals, “new groups of composite indicators need to be added to the standard statistical indicators on development and on the health, education and social status of the child”. Due to the withdrawal of the draft, neither the roadmap for the implementation of the strategy nor the set of indicators for its monitoring have yet been developed.

Although the full set of indicators for monitoring the implementation of the future strategy is not developed yet the draft envisages **measurable targets** under some of its strategic objectives. Thus, for example, the objective to ensure that every child has access to quality education and care at every stage of the life cycle and acquires the skills and competencies to participate fully in society is expected to result in an increase in the share of children aged 0-7 years covered by early childhood education and care with a target coverage of 33 % for children aged 0-3 years and 95 % for those aged 4-7 years. Another example is the strategic objective to improve the standard of living of every child and ensure their right to live in a supportive family or family-like environment, which is expected to reduce to the EU average the proportion of children living in poverty, at risk of poverty or social exclusion, or in overcrowded housing.

2.4. BNSI/FRA survey data

The BNSI/FRA survey suggests a number of indicators on children. Since, due to the withdrawal of the draft National Child Strategy 2019-2030, the development of the monitoring and evaluation framework for its implementation is still pending, these indicators can be used when elaborating the future set of baseline and composite indicators, envisaged in the draft.

The BNSI/FRA survey includes relevant indicators for each of the strategic objectives defined by the draft strategy. These indicators provide aggregated data for all children from a given age group as well as data at the district level and data disaggregated by specific socio-demographic characteristics.⁶ This allows not only to assess the overall progress towards a specific objective but also to identify the districts or groups of children that are lagging behind the target.

Thus, for example, one of the expected results of the strategic objective to ensure that every child has access to quality education and care at every stage of the life cycle and acquires the skills and competencies to participate fully in society is to reduce the proportion of children dropping out of education. The BNSI/FRA survey includes an indicator estimating the share of children of compulsory school age who do not attend school, which can be used for monitoring the progress toward achieving this result. According to the survey results, in 2020, the share of children of compulsory school age attending education was almost 95 %. However, disaggregated data show considerably lower attendance rates among Roma children (86.2 %) and children living in households in which the highest level of completed education among its members aged 24 years and over is lower secondary (86.4 %) or primary (70.1 %) education.⁷

Although the BNSI/FRA survey covers largely the same thematic areas as the ones identified by the draft strategy as key areas of intervention, the suggested indicators use **age groups that are different from the periods of the life cycle of children** on which the strategy is based. The age-specific indicators suggested by the survey apply to children aged 0-2 years, 2-4 years, 0-4 years, 5-14 years and 15-17 years⁸ while the draft strategy is mostly based on the age groups 0-6/7 years, 7-13 years and 14/15-18 years. This difference does not completely exclude the use of the BNSI/FRA survey indicators as a tool for monitoring the implementation of the strategy but somewhat limits the use of their full potential. Therefore, in future surveys, it is advisable to **align the different age groups of the survey with the age groups defined in the national policy framework**. This will allow the indicators to be used to their maximum potential especially in terms of their ability to generate data at the district level as well as data on specific groups of children that might be at higher risk of poverty, social exclusion and violation of rights.⁹

¹ Bulgaria, Council of Ministers (*Министерски съвет*) (2019), Draft National Child Strategy 2019–2030 ([Проект на Национална стратегия за детето 2019-2030](#)), 10 January 2019.

² For more information on the events leading to the withdrawal of the draft strategy, see Markov, D., Doichinova, M. and Todorova, R. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on children, Sofia, National Statistical Institute.

³ Bulgaria, Council of Ministers (*Министерски съвет*), National Strategy for Poverty Reduction and Promotion of Social Inclusion 2020–2030 ([Национална стратегия за намаляване на бедността и насърчаване на социалното включване 2020–2030](#)), 31 December 2020.

⁴ European Commission (2021), [EU strategy on the rights of the child](#), COM(2021) 142 final, 24 March 2021.

⁵ Council of the European Union (2021), [Council Recommendation \(EU\) 2021/1004 of 14 June 2021 establishing a European Child Guarantee](#), OJ 2021 L 223.

⁶ For the full set of indicators on children, see Markov, D., Doichinova, M. and Todorova, R. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on children, Sofia, National Statistical Institute.

⁷ For the full set of indicators and the survey results for children, see Markov, D., Doichinova, M. and Todorova, R. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on children, Sofia, National Statistical Institute.

⁸ For more information on the age groups and the age-specific indicators, see Markov, D., Doichinova, M. and Todorova, R. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on children, Sofia, National Statistical Institute.

⁹ For the full set of indicators and the survey results for children, see Markov, D., Doichinova, M. and Todorova, R. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on children, Sofia, National Statistical Institute.



3. Older persons

3.1. Policy framework

The main document that sets out Bulgaria's **policy on older people** is the National Strategy for Active Life of Older People in Bulgaria 2019–2030 (*Национална стратегия за активен живот на възрастните хора в България 2019–2030 г.*).¹ The strategy does not explicitly define the age of its target group, but, for the background analysis, it mostly uses data on people aged 65 years and over. Being an important and valuable resource of Bulgaria, older people have the right to a dignified existence and full participation in social life, to good health and productive life, to the development of their knowledge, skills and abilities, to equal treatment and to the protection of their fundamental human rights. The strategy aims to create conditions for, and guarantees of, equal opportunities for a dignified and full life.

Recognising that older people are a key human resource (as both a generator and a source of experience and knowledge, and as a source of community and family support through caring for dependents and passing on work-related knowledge to younger generations), the strategy is based on four **values**:

- independent living understood as access to good living conditions and a good physical environment, reliable transportation, sufficient income, a safe living environment in the community and access to reliable and usable information;
- participation in society meaning social participation and opportunities for volunteering as means of dealing with isolation and loneliness, as well as active civic participation in decision-making processes;
- access to care allowing the promotion of the health and well-being of older people, and access to adequate health and social services tailored to the individual needs of older people, including home care for those with permanent disabilities;
- dignity understood as older people living in a safe environment, without being subjected to physical and psychological aggression, having their human rights and their right to equality respected and being able to protect themselves from ageism in society.

The strategy's **aim** is to create the conditions for older people to have active and satisfactory lives by providing equal opportunities for their full participation in society's economic and social life. The strategy has four **priorities**: (1) promoting active ageing in employment; (2) promoting active ageing in participation in society; (3) promoting active ageing in independent living; and (4) building capacity and an enabling environment for active ageing at national and regional levels.

3.2. Background data and indicators

The strategy provides an **overview of the situation of older people** in Bulgaria, which serves as justification for setting its objectives and priorities. The overview is mostly based on data from BNSI (number and share of older people, sex ratio and age dependency rates), Eurostat and Eurobarometer (health status, sport and physical activity, cultural access and participation).

In addition, the document refers to the Active Ageing Index (AAI) developed by the United Nations Economic Commission for Europe.² The AAI is used for defining the strategy's priority areas based on (a) the ranking of Bulgaria according to the AAI results in 2016 and (b) the country's results in the four domains of the index vis-à-vis the average results at the EU level.

3.3. Indicators for monitoring and evaluation

For the monitoring and assessment of its implementation, the National Strategy for Active Life of Older People in Bulgaria 2019-2030 refers directly to the **set of indicators of the Active Ageing Index** developed by the United Nations Economic Commission for Europe.³ According to the strategy, its four priorities are formulated in such a way that there is consistency with the indicators of the index. The strategy also provides a list of sources for collecting the data in relation to the regular update of the indicators. These sources include data collected by national public bodies, including BNSI, and data from European surveys like the European Union Labour Force Survey (EU-LFS), the European Quality of Life Survey (EQLS), the European Union Statistics on Income and Living Conditions (EU-SILC) and the European Social Survey (ESS).

The main **institution responsible for the monitoring and evaluation** of the implementation of the strategy is the Ministry of Labour and Social Policy (MLSP) (*Министерство на труда и социалната политика*, МТСП). According to the strategy, the results of its implementation will be subject to both periodic evaluation (every four years) and final evaluation (after the end of the whole implementation period).

The strategy does not explicitly define any **baselines** for the suggested indicators. However, the results of the Active Ageing Index for 2018 (based on data for 2016), published by the United Nations Economic Commission for Europe and also mentioned in the background section of the strategy, can serve as baselines against which progress can be measured. In terms of **targets**, instead of defining a specific target for each indicator, the strategy envisages that for all indicators the targets will be the average results at the EU level.

3.4. BNSI/FRA survey data

The BNSI/FRA survey includes several indicators that can be used for assessing the implementation of the National Strategy for Active Life of Older People in Bulgaria 2019-2030 because they correspond to the indicators used for calculating the Active Ageing Index. These are the indicators of access to health and dental care (unmet need for a medical and dental examination or treatment during the 12 months preceding the survey), no poverty risk (share of people who are not at risk of poverty), and physical safety (percentage of people who are feeling very safe or safe to walk after dark in their local area).⁴

The data collected through the BNSI/FRA survey can serve multiple purposes. On the one hand, compared to the results of the Active Ageing Index for 2018 published by the United Nations Economic Commission for Europe, the BNSI/FRA survey data can serve for **registering the (positive or negative) change** resulting from the implementation of the strategy. On the other hand, the BNSI/FRA survey provides data disaggregated by districts and by specific socio-demographic characteristics, making it possible to **identify specific regions and groups of older people** for which more intensive support measures are needed.

Thus, for example, according to the Active Ageing Index 2018 results for Bulgaria (based on data from EU-SILC 2016), 88 % of the people in the country aged 65 years and over were not at risk of poverty.⁵ According to the BNSI/FRA survey, in 2020, the share of older persons aged 65 years and over who were at risk of poverty was 36.2 % with some groups like women (41.8 %), persons self-identifying as ethnic Turks (59.7 %) and Roma (76.5), persons living alone (72.2 %) and persons living in rural areas (51.2 %) standing out as particularly vulnerable to the risk of poverty.⁶

¹ Bulgaria, Council of Ministers (*Министерски съвет*) (2019), National Strategy for Active Life of Older People in Bulgaria 2019-2030 (*Национална стратегия за активен живот на възрастните хора в България 2019-2030 г.*), 15 March 2019.

² For more information, see the [website](#) of the United Nations Economic Commission for Europe.

³ For more information, see the [website](#) of the United Nations Economic Commission for Europe.

⁴ For the full set of indicators and the survey results for older people, see Doseva, D. and Todorova, R. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on older people, Sofia, National Statistical Institute.

⁵ United Nations Economic Commission for Europe (2021), [2018 Active Ageing Index: Analytical Report](#), Geneva, United Nations, October 2019.

⁶ For the full set of indicators and the survey results for older people, see Doseva, D. and Todorova, R. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on older people, Sofia, National Statistical Institute.

4. Persons with disabilities

4.1. Policy framework

The main strategic document laying down the national **policy framework for people with disabilities** is the National Strategy for People with Disabilities 2021–2030 (*Национална стратегия за хората с увреждания 2021 – 2030 г.*).¹

In addition to the main principles laid down in Article 3 of the Convention on the Rights of Persons with Disabilities, the strategy is based on a set of additional **principles**, including respect for human dignity and equal treatment of persons with disabilities, including personal choice and independence, equality and non-discrimination, full and effective participation in community life, individual approach guaranteeing the rights of persons with disabilities, accessibility, effectiveness and efficiency, partnership and interaction between stakeholders, and sustainability of results.

The strategy's main **goal** is to improve the quality of life of people with disabilities by creating conditions and providing opportunities for their full and equal participation in the community. To achieve this goal the strategy defines four **strategic objectives**: (1) increasing opportunities for independent living on an equal basis with others in an accessible environment and facilitating community inclusion with the opportunity for free expression and informed choice; (2) ensuring access to effective social support and an adequate standard of living, including enhancing the adequacy and sustainability of the social support system as a whole; (3) improving access to quality inclusive healthcare, education, employment and appropriate working conditions; and (4) prevention of social exclusion through an integrated approach – strengthening and reinforcing coordination and interaction between different sectoral policies in order to create conditions for active social inclusion of people with disabilities.

The implementation of these objectives is envisaged through targeted policies and interventions. The objectives are to be realised through measures grouped into seven interlinked and integrated **priorities** with corresponding expected performance outcomes: (1) ensuring an accessible environment; (2) ensuring access to inclusive education and providing opportunities for lifelong learning; (3) ensuring the sustainability of accessible and quality health services, including access to habilitation and rehabilitation without discrimination on the grounds of disability; (4) ensuring work and employment opportunities and appropriate working conditions; (5) providing opportunities for participation in cultural life, sport and leisure; (6) providing social protection and support in the community; and (7) ensuring the rights of children with disabilities.

In addition to the strategy, a series of other policy documents spell out national commitments and measures for guaranteeing the rights of people with disabilities. The most important of those are the Action Plan for the Implementation of the Final Recommendations to the Republic of Bulgaria Made by the UN Committee on the Rights of Persons with Disabilities 2021–2026 (*План за действие за изпълнение на заключителните препоръки към Република България, отправени от Комитета на ООН за правата на хората с увреждания 2021 – 2026*),² the National Strategy for Poverty Reduction and Promotion of Social Inclusion 2030 (*Национална стратегия за намаляване на бедността и насърчаване на социалното включване 2030*);³ the National Strategy for Long-term Care (*Национална стратегия за дългосрочна грижа*)⁴ and the plan for its implementation for 2018–2021,⁵ the National Employment Programme for People with Disabilities (*Национална програма за заетост на хората с увреждания*),⁶ the National Employment and Training Programme for People with Permanent Disabilities (*Национална програма за заетост и обучение на хора с трайни увреждания*),⁷ the National Programme for Accessible Housing and Personal Mobility (*Национална програма за достъпна жилищна среда и лична мобилност*),⁸ etc.

4.2. Background data and indicators

The National Strategy for People with Disabilities 2021–2030 includes a brief **assessment of the current situation** and an **overview of the main challenges** that have to be addressed. This part of the document is mostly descriptive and contains only a few references to empirical data, mainly from Eurostat (e.g., the share of people with long-standing limitations in usual activities due to health problems, the share of people with disability/activity limitation at risk of poverty or social exclusion, etc.). The data is mainly used to highlight the difference between people with and without disabilities on the one hand, and on the other – to show Bulgaria’s place among the other EU countries (by comparing the data for Bulgaria with the average for the EU).

4.3. Indicators for monitoring and evaluation

According to the National Strategy for People with Disabilities 2021-2030, the implementation of the envisaged measures and the progress toward achieving the expected results should be monitored through a **set of key indicators**. The strategy itself neither specifies what these indicators are nor what data will be used to implement them. The first biennial action plan to implement the strategy (covering the period 2021-2022) provides indicators to assess the implementation of each of its measures. These indicators are not survey-based but either report a certain activity as completed or not completed (e.g., a developed action plan, a completed compliance table, etc.), or track certain numbers (of training participants, of buildings renovated to ensure accessibility, etc.).

4.4. BNSI/FRA survey data

The BNSI/FRA survey suggests a number of indicators for assessing the situation of people with disabilities. In the absence of indicators in the National Strategy for People with Disabilities 2021-2030, these indicators can fill the gap and serve as a monitoring tool to evaluate the implementation of the strategy.

The BNSI/FRA survey indicators are based on the Global Activity Limitation Instrument (GALI), which asks individuals to rate their long-term limitations in usual activities due to a health problem. GALI is accepted by the European Statistical System as a single-item measure of functional status and is widely used by European surveys and national statistical systems, which gives a certain level of comparability of results.⁹

The **indicators cover different areas of public life** such as employment and qualification, healthcare, housing, poverty and social exclusion, discrimination and social isolation, etc. These areas largely coincide with the strategy's priorities, allowing the set of indicators to be used to monitor and evaluate most of the measures laid down in the document. Furthermore, the BNSI/FRA survey collects data disaggregated by districts and by specific socio-demographic characteristics. This makes it possible to identify geographical regions and/or specific subgroups within the larger group of people with disabilities that are at higher risk of poverty, social exclusion and violation of fundamental rights.¹⁰

The BNSI/FRA survey indicators can also be used for **monitoring progress vis-à-vis certain benchmarks or targets**. For the indicators that correspond to indicators used by European surveys (e.g., at-risk-of-poverty rate) such a benchmark could be the average value of the same indicator at the EU level. This approach is observed in policies in other areas such as policies for older people where progress is measured by comparing indicators for Bulgaria with the EU average. For the indicators that do not correspond to any similar indicators applied at the EU level, a possible target could be to close the gap between people with and without disabilities, which, according to the survey results, is considerable in most areas covered by the survey.

Thus, for example, one of the priorities of the National Strategy for People with Disabilities 2021-2030 is to ensure work and employment opportunities and appropriate working conditions. According to the strategy, one of the expected results in this priority area is to provide people with disabilities with the opportunity to work, earn a living and be supported to reach their full potential. The progress toward achieving this result can be measured by the indicator for paid work included in the BNSI/FRA survey. According to the survey results, in 2020, the share of people aged 20-64 years who self-declared their main activity as paid work was 40.8 % among persons with severe self-reported long-standing limitations in usual activities due to health problems, 45.8 % among persons with non-severe limitations and 77.3 % among persons with no limitations. Apart from showing the gap between people with and without limitations (which in this case is more than 30 percentage points), the indicator points out some of the subgroups within the larger group of people with activity limitations that are at higher risk of not having a paid job. According to the survey results, these subgroups are the persons who self-identify as Roma (18.0 % in paid work) or Turkish (24.8 %), persons aged 45-64 years (38.2 %), persons at risk of poverty (17.2 %) and persons with completed lower secondary (21.4 %) or lower education.¹¹

¹ Bulgaria, Council of Ministers (*Министерски съвет*), National Strategy for People with Disabilities 2021-2030 ([Национална стратегия за хората с увреждания 2021 – 2030 г.](#)), 23 December 2020.

² Bulgaria, Council of Ministers (*Министерски съвет*), Action Plan for the implementation of the final recommendations to the Republic of Bulgaria addressed by the UN Committee on the Rights of Persons with Disabilities 2021 – 2026 ([План за действие за изпълнение на заключителните препоръки към Република България, отправени от Комитета на ООН за правата на хората с увреждания 2021 – 2026](#)), 12 February 2021.

³ Bulgaria, Council of Ministers (*Министерски съвет*), National Strategy for Poverty Reduction and Promotion of Social Inclusion 2020 – 2030 ([Национална стратегия за намаляване на бедността и насърчаване на социалното включване 2020 – 2030](#)), 31 December 2020.

⁴ Bulgaria, Council of Ministers (*Министерски съвет*), National Strategy for Long-term Care ([Национална стратегия за дългосрочна грижа](#)), 7 January 2014.

⁵ Bulgaria, Council of Ministers (*Министерски съвет*), Action plan for the Period 2018-2021 for the Implementation of the National Strategy for Long-term Care ([План за действие за периода 2018-2021 г. за изпълнение на Националната стратегия за дългосрочна грижа](#)), 19 January 2018.

⁶ Bulgaria, Ministry of Labour and Social Policy (*Министерство на труда и социалната политика*), National Employment Programme for People with Disabilities, under Article 44, paragraph 1 of the People with Disabilities Act ([Национална програма за заетост на хората с увреждания, съгласно чл.44, ал.1 от Закона за хората с увреждания](#)), 29 January 2021.

⁷ Bulgaria, Ministry of Labour and Social Policy (*Министерство на труда и социалната политика*), National Employment and Training Programme for People with Permanent Disabilities ([Национална програма за заетост и обучение на хора с трайни увреждания](#)).

⁸ Bulgaria, Ministry of Labour and Social Policy (*Министерство на труда и социалната политика*), National Programme for Accessible Housing and Personal Mobility ([Национална програма за достъпна жилищна среда и лична мобилност](#)), 20 August 2019.

⁹ For more information on the GALI instrument, see Doichinova, M. and Todorova, R. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on people with disabilities, Sofia, National Statistical Institute.

¹⁰ For the full set of indicators and the survey results for people with disabilities, see Doichinova, M. and Todorova, R. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on people with disabilities, Sofia, National Statistical Institute.

¹¹ For the full set of indicators and the survey results for people with disabilities, see Doichinova, M. and Todorova, R. (2022), Key social inclusion and fundamental rights indicators in Bulgaria: thematic report on people with disabilities, Sofia, National Statistical Institute.

Conclusions and recommendations

In Bulgaria, the design, implementation and evaluation of policies are rarely based on reliable quantitative data. To justify the objectives and measures they envisage, most strategy documents refer to official statistics, collected and published regularly by the BNSI, or to well-known European surveys, mostly conducted under the guidance of Eurostat. These data are mainly used for a general analysis and assessment of the situation in the area covered by the respective strategy, as well as for comparing the situation in the country with that in the other EU Member States. In most cases, however, there is no direct link between the data quoted on the one hand and the measures and expected results set out in the document concerned on the other. In other words, it is not clear how the envisaged measures correspond to these data, what change in the current situation is expected to occur and at what value of the data the implementation of the measures could be considered successful.

The situation is similar when using quantitative data to assess the performance of public policies. Many of the national strategy documents lack adequate sets of indicators for monitoring and evaluating implementation, which would be able to show the presence or absence of progress both during the implementation of the measures concerned and after the time limit for their implementation. Even the documents that do include indicators often lack baselines and/or targets that would allow a real assessment of the change that has occurred. Among the few good examples in this respect are the National Strategy of the Republic of Bulgaria for Roma Equality, Inclusion and Participation 2021-2030, which is one of the first national strategic documents with a comprehensive set of indicators with baseline and target values attached, and the National Strategy for Active Life of Older People in Bulgaria 2019-2030, which in turn uses an internationally recognised set of indicators, such as the Active Ageing Index developed by the UN Economic Commission for Europe.

The BNSI/FRA survey offers a rich set of indicators to assess the risk of poverty, social exclusion and violation of fundamental rights of vulnerable populations. These indicators can be used both to assess the current situation of these groups (with a view to designing new policies) and to periodically assess how this situation is changing (with a view to monitoring and evaluating existing policies). Moreover, many of the indicators make it possible to obtain data disaggregated by district and by different socio-demographic characteristics of the population, allowing the identification of specific regions and/or groups of people who are at higher risk of poverty, social exclusion or violation of fundamental rights and would therefore be in greater need of assistance and support measures.

However, in order to exploit the full potential of these indicators, there is a need to better align the process of their application with the process of public policy-making and implementation. On the one hand, this means that indicators should be used throughout the whole cycle of the policy process – from the assessment of needs, through the formulation of objectives and measures, to the evaluation of the impact of their implementation. On the other hand, the indicators themselves can be refined according to the priority areas for impact so as to reflect as far as possible the profile and specific characteristics of the target groups of the policies concerned.

The approach to the use of indicators adopted in the National Strategy of the Republic of Bulgaria for Roma Equality, Inclusion and Participation 2021-2030, although not yet fully implemented due to the recent adoption of the strategy, is a positive example that illustrates how the introduction of an appropriate set of indicators can create a comprehensive framework for monitoring and evaluating the implementation of a strategic document. The periodic application of this framework throughout the implementation of the strategy should generate sufficiently reliable data to assess progress in the implementation of the measures set out and, consequently, the need to revise or update them. Adopting this approach in other public policies targeting vulnerable groups will contribute to a more

informed and objective monitoring of their implementation and a more adequate response in case of a need to update the planned measures.