



ACT-PROJECT

IMPROVING ACCESS TO
ALTERNATIVE CARE FOR
UNACCOMPANIED CHILDREN
AGED 15-18



SITUATION REPORT BULGARIA



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INTRODUCTION

This report is the result of the Alternative Care Training (ACT) project. ACT is a cooperation of Lumos Foundation in Bulgaria with project partners from Italy and Spain, coordinated by Nidos Foundation in the Netherlands. The ACT-project aims to improve the access to and increase the quality of alternative care arrangements for unaccompanied children (UAC) aged 15-18, through providing actors interested in developing family and community-based alternative care arrangements (different from institutional care) in the countries of project partners and other member states (MS) with training of their staff (guardians and other practitioners that work in alternative care arrangements). It also aims to improve the sustainability of alternative care for unaccompanied children in member states.

A situational analysis has been carried out which collected information about the accessibility and quality of alternative care arrangements for unaccompanied children aged 15-18. Desk-based research was conducted in January- May 2020. Bulgarian stakeholders from were consulted in a meeting in July 2020 to provide their important input, which has also been included in this analysis. The opinion and advice from children are also crucial, and so their input was also provided via a survey. The results of the analysis in Bulgaria carried out by Lumos are summarised in this report; ranging from information on the general context, including the available forms of care, to current good practices, challenges and needs and recommendations.

1 DESCRIPTION OF RELEVANT LEGISLATION AT NATIONAL LEVEL

1.1 General context

1.1.1 Main legislative acts relevant to asylum procedures, reception conditions, detention and content of protection¹

Title in English	Original Title (BG)	Web Link
Law on Asylum and Refugees (LAR) 2002 <i>Last Amendment: №101 of 27 December 2019</i>	Закон за убежището и бежанците	http://bit.ly/1RkIHOr (EN) http://bit.ly/2k8slq7 (BG)
Law on Foreigners in the Republic of Bulgaria (LoF) 1998 <i>Last amendment: № 44 of 13 May 2020</i>	Закон за чужденците в Република България	http://bit.ly/2jpEaqx (BG) http://bit.ly/2kJoYpi (BG) http://bit.ly/1C9tvG5 (EN)
Child Protection Act 2000 <i>Last amendment: № 101 of December 27, 2019.</i>	Закон за закрила на детето	https://www.refworld.org/docid/44ad32014.html

The Law on Asylum and Refugees (LAR) regulates the reception of asylum-seekers, the assessment of their claims and their rights upon recognition. The Law on Foreigners (LoF) is applicable to persons who have not submitted a claim for international protection or whose claims have been finally refused.²

¹ Nidos, National Foster Care Association – Bulgaria, Know How Centre for Alternative Care of Children (2019) *Alternative Family Care in Bulgaria: Country Specific Separate Annex to the ALFACA Manual* <https://nidosineurope.eu/wp-content/plugins/download-attachments/includes/download.php?id=943> [Accessed 11 February 2020]; Bulgaria Helsinki Committee (2019) *Overview of the Legal Framework*, published in Aida <https://www.asylumineurope.org/reports/country/bulgaria> [Accessed 11 February 2020]

² UNHCR (2019) *UNHCR Bulgaria Fact Sheet (as of September 2019)* <https://reliefweb.int/report/bulgaria/unhcr-bulgaria-factsheet-september-2019> [Accessed 11 February 2020]

The Child Protection Act, which outlines the rights of the child in line with Bulgaria's signature to the UN Convention on the Rights of the Child (CRC), is applicable to all children in Bulgaria. The Act includes a principle that all children shall be brought up in a family environment.

Detention

Bulgarian law prohibits the detention of unaccompanied children, but accompanied children can be detained with their parents for up to 3 months.³ Some unaccompanied children are detained in pre-removal detention centres, after being arrested for irregular entry or lack of documentation once in Bulgaria, because the identification process is usually only performed when they are already in the detention facility. Once identified as UAC, and upon application for international protection, they can then be transferred to an open reception centre.⁴

Integration

In September 2018, the government issued an order which imposed territorial limits for asylum-seekers in refugee centres, prohibiting them from moving out of prescribed areas.⁵ The same year, the government adopted the Regulation on Integration of Refugees; however, this fell short of providing an effective mechanism for integration. It has been highlighted that the Regulation failed to propose sufficient measures to create more favourable conditions for integration in local communities, or to improve access to social housing and family benefits for refugees.⁶ In 2019, no integration activities were planned, funded or made available to recognised refugees or subsidiary protection holders; marking the sixth consecutive year of the national "zero integration" policy.⁷

EU legislation

In November 2018, the European Commission sent a letter of formal notice to the Bulgarian government concerning the incorrect implementation of EU asylum legislation in Bulgaria. The Commission had found shortcomings in the national asylum system and related support services, in breach with asylum *acquis* and the Charter of Fundamental Rights. Concerns related to accommodation and legal representation of unaccompanied children; correct identification and support of vulnerable asylum seekers; provision of adequate legal assistance; and detention of asylum seekers, as well as safeguards in detention procedures.⁸

1.2 Legislation and policy on guardianship for unaccompanied children

The EU Reception Conditions Directive states that all children should be provided with guardianship and legal representation as soon as possible upon arrival.⁹ According to the Bulgarian Law on Asylum, a guardian will be appointed from the municipal administration, designated by the mayor of the municipality or by an official authorised by him. The guardian has powers and duties under this Act until the child reaches the age of majority, to safeguard the legal interest of the children during their status determination procedures and represent them before all administrative authorities, including

³ Law on Foreigners in the Republic of Bulgaria (LoF) 1998, Article 44, amendment of 2013 <http://bit.ly/1C9tvG5> [Accessed 9 November 2020]

⁴ Red Cross EU Office (2020) *Reducing the use of immigration detention: lessons from Bulgaria* <https://redcross.eu/latest-news/immigration-detention-on-the-rise-the-case-of-bulgaria> [Accessed 9 November 2020]

⁵ Nidos, et. al. (2019) op. cit.

⁶ UNHCR cited in Amnesty International, *Amnesty International Report 2017/18 - Bulgaria*, 22 February 2018, available at: <https://www.refworld.org/docid/5a9939384.html> [accessed 9 November 2020]

⁷ Bulgaria Helsinki Committee (2019), *Overview of the main changes since the previous report update, January 2019*, published in Aida <https://www.asylumineurope.org/reports/country/bulgaria/overview-main-changes-previous-report-update> [Accessed 11 February 2020]

⁸ Nidos, et. al. (2019) op. cit.

⁹ The recast Directive 2013/33/EU of the European Parliament and of the Council of 26 June 2013 laying down standards for the reception of applicants for international protection, Article 24(1), available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013L0033&from=EN> [Accessed 9 November 2020]

social, health care, educational and other institutions with a view to protecting children's best interests.¹⁰

In September 2018, the National Assembly adopted amendments to the Law on Foreigners which included an obligation to provide legal representation for all unaccompanied children and to increase the authority of the local Social Assistance Directorates (part of the ASA) in all proceedings involving unaccompanied children who had not applied for international protection. However, the amendments proposed repealing the requirement for an individual best interests' assessment before placing children in short-term immigration detention, raising concern that this would legitimise the practice.

1.3 Guardianship in practice

The lack of qualified guardians has been criticised by NGOs and the Bulgarian Ombudsman who have underlined that the situation in which unaccompanied children find themselves in Bulgaria accentuates safety risks, and contributes to the high absconding rate of unaccompanied children.

The Bulgaria Helsinki Committee reported that unaccompanied children were not appointed a legal guardian for status determination procedure in any of the cases which were monitored throughout 2018.¹¹ Many of these children also registered their asylum application without the presence of either a legal representative or a social worker.¹²

The current arrangement where there is only one guardian for several children is not meeting the children's needs and is insufficient. Furthermore, the guardian can be selected among any of the municipality staff (e.g. a driver or courier), does not receive adequate training and often lacks knowledge or skills to deal with unaccompanied asylum-seeking children.¹³

¹⁰ Council of Europe (2018) *Report of the fact-finding mission by Ambassador Tomáš Boček, Special Representative of the Secretary General on migration and refugees, to Bulgaria, 13-17 November 2017*, <https://rm.coe.int/report-of-the-fact-finding-mission-by-ambassador-tomas-bocek-special-r/16807be041> [Accessed 5 November 2020]

¹¹ Bulgaria Helsinki Committee (2018) *Legal Representation of Unaccompanied Children*, Published on *Aida* <https://www.asylumineurope.org/reports/country/bulgaria/asylum-procedure/guarantees-vulnerable-groups> [Accessed 11 February 2020] This shows no improvement since 2016, when the same statistics were reported: Bulgaria Helsinki Committee (2016) *Human Rights in 2016* http://www.bghelsinki.org/media/uploads/annual_reports/annual_bhc_report_2016_issn-2367-6930_bg.pdf [Accessed 11 February 2020]

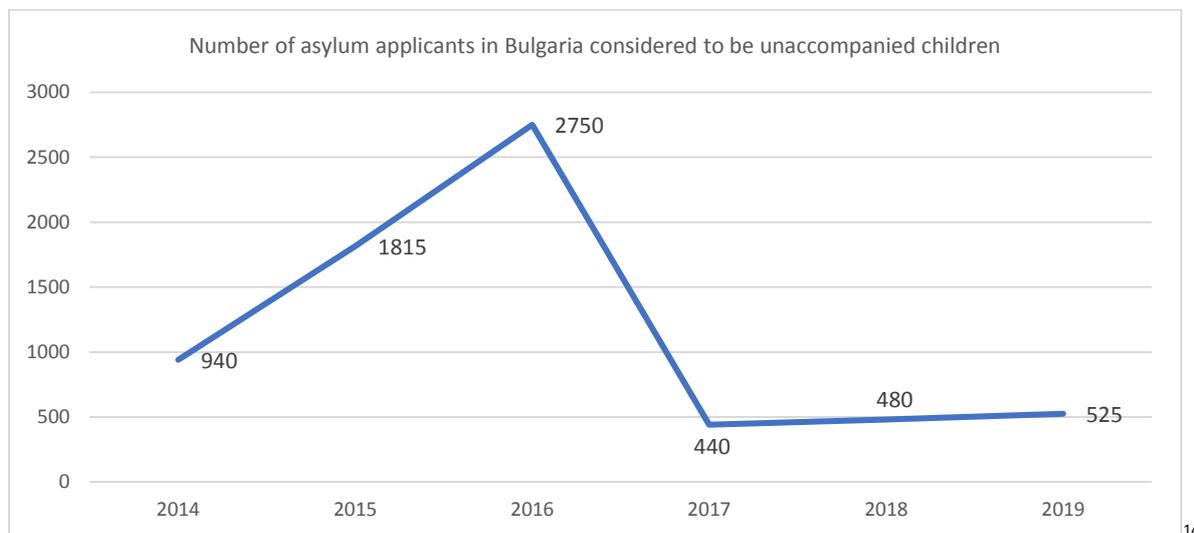
¹² This gap has also been identified by UNHCR and raised with the Bulgarian authorities.

¹³ Council of Europe (2018), *op. cit.*

2 PROFILE OF THE CHILDREN & KEY STAKEHOLDERS

2.1 Profile of the children

2.1.1 Number of UAC

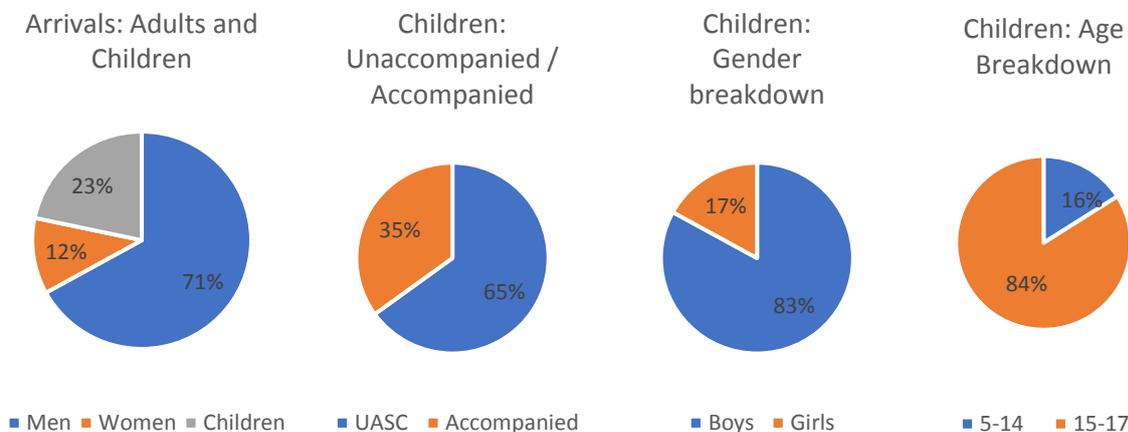


After a peak of arrivals in 2016, the number of unaccompanied children applying for asylum in Bulgaria has been lower in recent years.

2.1.2 Main countries of origin

As of June 2019, the main countries of origin for UAC were Afghanistan, Iran and Pakistan.¹⁵

2.1.3 Demographic of arrivals (Jan-June 2019):



16

As of June 2019, 156 children (85% boys and 15% girls), including 54 UAC, were accommodated in reception facilities in Sofia and southern Bulgaria. This represents a 27% decrease in the number of children compared to December 2018, mainly due to continued onward movements.¹⁷

¹⁴ Eurostat, *Asylum applicants considered to be unaccompanied minors, annual data*

<https://ec.europa.eu/eurostat/tgm/table.do?%20tab=table&init=1&language=en&pcode=tps00194&plugin=1> [Accessed 9 November 2020]

¹⁵ UNICEF, *Latest statistics and graphics on refugee and migrant children*, January - December 2019

<https://www.unicef.org/eca/emergencies/latest-statistics-and-graphics-refugee-and-migrant-children> [Accessed 9 November 2020]

¹⁶ Ibid.

¹⁷ Ibid.

2.2 Key Stakeholders

STAKEHOLDER	RESPONSIBILITIES / ROLE
State authorities	
State Agency for Refugees (SAR)	Registering and examining applications for protection. Management of Reception Centres.
State Agency for Child Protection (SACP)	Child Protection (as described in CP Act), Alternative Care for children
Agency for Social Assistance (ASA)	<p>Safeguarding the rights and interests of unaccompanied child foreign nationals and child refugees is one of the priority themes for the ASA.</p> <p>The ASA, through partnership with leading international organisations (UNICEF and UNHCR) and non-governmental organisations (National Network for Children), provides international experience and expertise in the field of child protection, foster care, protection and care of child refugees in the context of migratory flow and crisis. Training programmes on working with unaccompanied child foreign nationals and child refugees are delivered periodically for social workers from the child protection system.</p>
Ombudsman	In the performance of the functions of the National Preventive Mechanism, the Ombudsman independently monitors persons accommodated in the refugee reception centres and temporary accommodation facilities for foreigners and makes recommendations in cases of violation of their rights.
Municipalities	Guardianship/representation
Ministry of Labour and Social Policies	Community-based services, legislation including on child protection
NGOs	
Bulgarian Red Cross	MOU with SAR for detention centre monitoring
Terre des Hommes	Safe Spaces, Case management (BRC is implementing partner)
SOS Children's Villages	Alternative care, including a number of UASC
UNICEF	Integration, improving legal representation, recreational and non-formal learning in reception centres
UNHCR	<p>UNHCR is entitled by law to be present at all asylum interviews and regularly engages with the authorities to assist with improving access to and the quality of the Statelessness Determination Procedure.</p> <p>UNHCR encourages the government to ensure all stateless persons on its territory are identified and have full and effective access to the rights to which they are entitled under international law.</p>
IOM	Safe Zones for unaccompanied children in Registration and Reception Centres (RRCs)
Bulgaria Helsinki Committee	Identification and assessment of vulnerability. Plays a monitoring role – e.g. on presence of legal representation at asylum determination interviews
Voice in Bulgaria	Legal aid and advocacy – focus on alternatives to detention, protections for vulnerable asylum seekers
Caritas	Education and psychosocial activities in RRCs, integration
Foundation for Access to Rights	Access to rights, legal, awareness raising
Council for Refugee Women	Integration, advocacy, social mediation
CVS	Intercultural awareness, trainings, psychosocial activities

3 AVAILABLE FORMS OF (INSTITUTIONAL & ALTERNATIVE) CARE FOR UAC / NATIONAL CHILDREN / MIGRANT AND REFUGEE CHILDREN, INCLUDING STRUCTURE AND FUNDING

3.1 Description of the reception system

When the Bulgarian police or border authorities identify an unaccompanied child who is a foreign national, they notify the Directorate for Social Assistance who will send a representative from the child protection department to meet the child and the officers. The child will be informed and consulted on processes for applying for international protection. If the child requests international protection, then the State Agency for Refugees (SAR) is informed and will determine the care placement for the child.

By law, unaccompanied children are accommodated in: (1) a family of relatives or close relatives, a reception family, a residential social service or a specialised institution under the terms and conditions of the Child Protection Act; or (2) other accommodation facilities with special facilities for children. In practice, in almost all cases the child will be placed in a Registration and Reception Centre (RRC) run by the SAR, which fall into category 2.

Unaccompanied children usually stay in the RRC for 3-6 months, while their international protection request is processed.¹⁸ During this time, some children leave the RRC to pursue their onward journey to another European country, as Bulgaria is viewed as a transit country for them.

Once international protection is granted, the child will be referred to alternative care and support services which are mostly run by NGOs, and they will usually be placed in a small group home. Foster care is an option which is available to these children in theory, but this is not used in practice. For this group of 15-18-year-old children who are foreign nationals, foster care is either determined as not the best option for the child, or the authorities are unable to identify suitable and willing foster carers.¹⁹

3.2 An overview of the reception possibilities and routing

3.2.1 Registration and Reception Centres

Unaccompanied children who apply for international protection fall under the responsibility of the State Agency for Refugees and the majority are accommodated in Registration and Reception Centres (RRC) in Sofia and Harmanli, run by the SAR.²⁰ These are large institutions, with capacity for over 2,000 people each, but in December 2018 accommodated only 267 asylum-seekers (184 in Sofia and 83 in Harmanli), including adults.²¹ There have been concerns about a lack of care for children's well-being in the centres,²² and that children are unsupervised outside daytime working hours.²³

In Sofia RRCs (Ovcha Kupel and Voenna Rampa) children were accommodated on a separate floor to adults, and in Harmanli children were accommodated in a separate block for vulnerable groups.²⁴ In its National Preventive Mechanism report for 2017, the Bulgarian Ombudsperson highlighted a lack of specialised reception facilities for unaccompanied children and recommended that a separate

¹⁸ Lumos Foundation (2020) *Rethinking Care: Improving Support for Unaccompanied Migrant, Asylum Seeking and Refugee in the European Union*, p. 66, <https://www.wearelumos.org/resources/rethinking-care/>, p.47 [Accessed 19 August 2020]

¹⁹ Input from ACT stakeholder meeting

²⁰ 58 total in December 2018

²¹ Lumos (2018) Unpublished data: on file with Lumos

²² Aida (2018) *Country Report; Bulgaria*, <https://www.asylumineurope.org/news/28-02-2019/aida-2018-update-bulgaria> p. 54 [Accessed 11 February 2020]

²³ Lumos (2018) Unpublished data: on file with Lumos

²⁴ Lumos (2018) Unpublished data: on file with Lumos

specialised facility should be established.²⁵ In the last year, Safe Zones for unaccompanied children have been opened within the Sofia RRCs – see section 3.3 recent developments and opportunities.

3.2.2 Care for National Children and UAC with international protection permits

Bulgaria developed a National Action Plan for Deinstitutionalisation in 2010, and since then has made significant progress to transform its care system. Over €100 million from EU structural funds has been allocated to support this deinstitutionalisation process.²⁶ National children deprived of parental care, and unaccompanied migrant children who have been given a permit to stay, are generally cared for through family or community-based services in accordance with the Child Protection Act and in line with the country's continued progress towards deinstitutionalisation.²⁷ This includes mostly the use of small group homes, but also family-based alternatives such as foster care.

In 2018, there were 3,059 children in 283 small group homes in Bulgaria. These homes are not specific to refugee and migrant children, but also care for Bulgarian children outside family care. Nine UAC with international protection status were placed in small group homes in 2018, and 14 UAC were placed in these facilities in 2017.²⁸ These homes have a capacity to care for up to 12 children and provide a mix of social services with a focus on individualised provision of care and education, with links to community-based services to encourage integration in the community.²⁹

3.2.3 Foster Care

Since 2010, foster care has become an increasingly utilised alternative care arrangement, as opposed to institutional care, for Bulgarian children. Foster care is also an option available to unaccompanied refugee and migrant children in Bulgaria as per existing legislation and policy frameworks.³⁰

While the use of foster care for national children is growing, only one unaccompanied refugee child was placed in a foster family in 2017 and none were in foster care in 2018.³¹ In contrast, there were 2,320 Bulgarian children in foster care in 2018.³² The general reasons for the lack of placements for UAC include various factors: lack of available foster placements, especially for older children, language and cultural barriers, and administrative difficulties coordinating between the different government agencies responsible.

The ASA, through partnership with UNICEF, UNHCR and the National Network for Children, provides expertise and training to professionals and carers on child protection, foster care, and working with unaccompanied migrant, asylum-seeking and refugee children. Since December 2015, the project *Accept Me 2015* has worked to refine and extend the scope of foster care as an alternative form of care for all children in Bulgaria. This involved the development of professional, specialised foster care for children with additional vulnerabilities, including unaccompanied migrant, asylum-seeking and refugee children.³³

²⁵ FRA (2018) Periodic data collection on the migration situation in the EU – March 2018 Highlights <http://fra.europa.eu/en/publication/2018/migration-overviews-march-2018> [Accessed 11 February 2020]

²⁶ Opening Doors for Europe's Children (2018) *Bulgaria 2018 Country Fact Sheet* <https://www.openingdoors.eu/where-the-campaign-operates/bulgaria/> [Accessed 9 November 2020]

²⁷ Ministry of Labor and Social Policy *National Strategy for the Child 2008-2018* <https://www.mlsp.government.bg/index.php?section=POLICIES&l=263&lang=eng> [Accessed 11 February 2020]

²⁸ Lumos (2018) Unpublished data: on file with Lumos

²⁹ Lumos Foundation (2017) *Ending Institutionalisation: Moving From an Institution to a Community* <https://www.wearelumos.org/resources/ending-institutionalisation-moving-institution-community/> [Accessed 9 November 2020]

³⁰ Lumos (2018) Unpublished data: on file with Lumos

³¹ Lumos Foundation (2020) *op. cit.* p.64

³² Opening Doors for Europe's Children (2018) *op. cit.*

³³ Lumos Foundation (2020) *op. cit.* p.64

3.3 Recent developments and opportunities

3.3.1 Safe Zones

Recent developments include the opening of two Safe Zones for unaccompanied children in Ovcha Kupel and Voenna Rampa. The intention was to place unaccompanied children below the age of 14 in Ovcha Kupel, and adolescent unaccompanied children in Voenna Rampa.³⁴

The Voenna Rampa Safe Zone opened in mid-June 2019, and 39 unaccompanied children benefited from its services that month.³⁵ Children are provided care and support which is tailored to their needs. However, only unaccompanied children originating from Afghanistan are accommodated in this centre, while children from other nationalities remain in mixed dormitories in other reception centres. Moreover, despite the availability of places in the operational Safe Zone, some Afghan children were also accommodated in other reception centres such as the RRC Harmanli in 2019.³⁶

The Ovcha Kupel Safe Zone opened in January 2020 and is meant to accommodate children originating from Arab speaking countries.

Both Safe Zones are operated by the International Organisation for Migration (IOM) Bulgaria and funded by AMIF. However, the government has not yet proposed measures to continue or expand the Safe Zones after the AMIF project and funding ends.³⁷

4 GOOD PRACTICES, CHALLENGES AND NEEDS ON PROVIDING ALTERNATIVE CARE TO UAC AGED 15-18

4.1 From the perspective of the children

Lumos worked with the State Agency for Refugees and SOS Children's Villages to administer a survey to 12 unaccompanied children in June 2020. 9 of these children were living in an RRC and 3 were living in an SOS small group home. The survey asked children's opinion on the most and least helpful elements of the care and services received in Bulgaria, how Bulgaria could improve its care for UAC and what advice children would give to the government and organisations who are responsible for providing these care services.

In general, the survey responses showed a positive attitude towards services they have received in Bulgaria, but many responded that they did not know what type of care services would be preferable, possibly because they are not aware of family- and community-based alternatives.

Some children focused on additional services and activities such as sport, clothing and food. Other responses focused on desire for permanent placement – this was mainly from children living in small group homes outside the reception centres. Many wanted procedures to move faster for international protection, to speed up family reunification processes.

In general, there was positive feedback regarding the Safe Zones. However, two children noted their stay in the RRC was the least helpful part of the care system and services in Bulgaria.

Quotes from children's survey responses included:

³⁴ Nidos, et. al. (2019) *op. cit.*

³⁵ UNICEF, *Latest statistics and graphics on refugee and migrant children*, January - December 2019, *op. cit.*

³⁶ Bulgaria Helsinki Committee (2019), *Overview of the main changes since the previous report update, January 2019, op. cit.*

³⁷ *Ibid.*

- Regarding Safe Zones: “we get everything we need there – doctor, services, good staff, everything is clean”
- In response to what is needed: “More support and more individual approach.”
- “Unaccompanied children need more attention because they have suffered a lot and they need help with their trauma”
- In response to what advice they would give to the government and service providers in Bulgaria: “I recommend paying more attention to the refugee children because they endured a huge pain from their childhood and they should provide safety, welfare and accommodation for the migrant children...”

4.2 From the perspective of stakeholders

4.2.1 Good practices

During the Stakeholder Meeting, participants spoke about examples of positive practice in Bulgaria, responses included:

- Safe Zones are seen as an example of positive practice because there is a team of experts available to children, including psychological services, interpreters, legal aid, and social workers.
- One child who was not planning to stay in Bulgaria and did not plan to apply for protection status, but through multi-disciplinary meetings it was decided that this was not in the child’s best interests because they could not access required medical care if they did not submit a protection request. In the end the child was awarded protection and moved to small group home. This was seen as an example of working for best interest of child with a positive outcome.
- Another child was living in a small group home, when they turned 18 and were granted protection they decided to try to live in Western Europe, but they returned to Bulgaria as they were more comfortable there. They are now working, renting a flat and doing very well.

4.2.2 Challenges

- One main challenge in providing alternative care to UAC aged 15-18 is the age of the children. The authorities have found it more difficult to recruit foster families for older adolescents.
- There was concern expressed at the stakeholder meeting that the current legislation is a barrier to adolescents accessing alternative care, as children are only referred to alternative care after they have been granted international protection, meaning they are required to stay for long periods in the RRCs. Legislative changes are required to support the process.
- Finding the right supporting environment for unaccompanied children. It is important for the children to feel safe and supported, this may be achieved with families close to their culture. But it is also good to spend time in Bulgarian environment to ensure integration.
- Insufficient capacity in government agencies with regard to funding and human resources. The government agencies need financial and legal support to improve access to alternative care for this group of children.

4.2.3 Suggestions for improving access to alternative care for UAC aged 15-18

During the Stakeholder Meeting, participants also provided suggestions on how access to alternative care could be improved in Bulgaria. Suggestions included:

- Improving regulations around guardianship to professionalise guardianship and ensure that proper time is allocated for this role. Ensure support is provided to guardians by a team of professionals and a network of guardians.
- Providing psychological support to children.
- Involving all actors in improving care for unaccompanied children, including SACP, SAR, ASA, mayors and municipalities, Ministry of Justice, Labour, etc.
- Undertaking unified integrated assessments of the best interests of the child.
- Creating a service outside the reception centre which is more integrated in the community, with smaller capacity but with similar services to those currently provided in the Safe Zones.
- Ensuring that children have access to services from the day they arrive and are identified, and throughout their asylum procedure.

4.2.4 Requirements to improve the system

- National standards should correspond to European standards, but legislation needs to be adapted to the Bulgarian situation for reception and services.
- The creation of opportunities for families from the community to be involved.
- Investment in human resources capacity, including specific training, professional foster care, partnerships with families from the migrant and refugee community. This also includes increased capacity of the child protection department (SACP) through the provision of specially trained social workers to conduct assessment and analysis.
- Develop a coordination mechanism to encourage cooperation and exchange of information between NGOs and institutions on existing projects, and sharing of good practices.
- Community services which are family-oriented to specific needs.
- Assessment to decide whether to adapt and improve the current child protection system or to develop a new system in parallel which is specific to unaccompanied children.
- Publicity and communication plan aimed at the community to raise awareness about the needs of UAC.

4.3 SWOT Analysis

This report mentions good practises, possible challenges and needs that are encountered in (the entrance to) alternative care within the Bulgarian reception system for unaccompanied children aged 15-18. To provide a clear overview, they are displayed in the SWOT analysis below, which was developed by Bulgarian stakeholders.

Strengths	Weaknesses
<ul style="list-style-type: none"> • There is a legislative framework available, stakeholders and authorities are not starting from scratch. • Safe Zones – positive progress recently, compared to previous years • Capacity has been built in mainstream social services where UAC are 	<ul style="list-style-type: none"> • Current guardianship practice is not working well. It is not professionalised, guardians are appointed by the municipality and have may other functions in addition to guardianship, which means that they do not have enough time to work with each child.

sometimes placed. There is a foundation to develop this further.

- Existence of residential and non-residential services for children in Bulgaria
- Many organisations have networks and pools of interpreters and social workers who work in different organisations.
- Social workers from countries of origin which helps with the work, including staffing from refugees/migrants.
- Coordination and cooperation between institutions has improved a lot over the past few years.
- There are many dedicated and talented professionals working in Bulgaria with lots of expertise to share.

- Some gaps in coordination in particular cases and despite improvements, it is not always a smooth process.
- Government policy on integration leads to difficulty in working for integration for children that will not get status to remain.
- Very difficult to convince children not to move on with traffickers to western Europe, especially when integration in Bulgaria is limited. E.g. staff are making an effort to convince UAC to go to school but the UAC are only interested in their onward journey.
- Improvements needed on how to advise children about their rights.
- Lack of capacity in social services to work with foreign nationals.

Opportunities

- No current crisis and slower arrival rates, which allows opportunities to try different strategies to improve services.
- The new Law on Social Services will provide more opportunities to provide improved care for UAC
- Availability of resources. New EU funds can be used in meaningful way to improve care for UAC in Bulgaria. An opportunity to lobby and think about how these resources could be focused properly.
- Promising work with migrant communities in Bulgaria
- Relocation schemes which include EU support to member states who receive UAC
- New strategy on migration is an opportunity to plan for care for UAC and identify them as separate target group for more tailored support.

Threats

- If another increase in flow of refugees occurs (like in 2015/16), this would prove to be very challenging to manage, and could reverse any progress made in recent years.
 - Lack of political will to improve care for UAC poses a threat to the implementation of new practices.
 - Political climate could deteriorate, with a rise in anti-immigrant policies, which would have negative impact on refugees.
 - The risk of corruption and theft of money from European funds.
 - Negative public attitudes towards refugees and migrants.
 - Lack of opportunities for adapted education and personal development for UAC.
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5 RECOMMENDATIONS

- A thorough assessment is needed to decide whether to adapt and improve the current child protection system or to develop a new system in parallel which is specific to unaccompanied children.
- Develop a coordination mechanism to encourage cooperation and exchange of information between NGOs and institutions on existing projects, and sharing of good practices.
- Amend guardianship policies and processes to allow for introduction of professionalised guardians with a small number of children for each guardian. This would need to be led by relevant government authorities.
- Ensure all relevant stakeholder are involved in training programmes and implementation of improvements.