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REVIEWING EXISTING QUALITY MECHANISMS IN CHILD PROTECTION BULGARIA NATIONAL REPORT



Natalia GUERASSIMOVA HRISTOVA – MIHAYLOVA
October 2017



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THIS PUBLICATION WAS POSSIBLE THANKS
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1. EXECUTIVE SUMMARY

The National Report describes existing standards, regulations, indicators and systems for monitoring the quality of child protection services in Bulgaria. It reviews the mechanisms and procedures applied by national authorities to ensure the quality of child protection services and to determine potential promising practices in this regard. The review is based on a research approach which includes a combination of primary and secondary data sources, utilising the advantages of desk research and a qualitative approach. The mixed research methodology permits the vertical and horizontal diversity of the social/child protection systems to be covered through this research, including policies, standards, regulations, indicators and systems for monitoring the quality of child protection services in Bulgaria. The report explores 18 main sources of information and 8 semi-structured interviews. The report also explores the main tools for data collection and analytical reports at the national level.

National legislation

The available standards are oriented mainly towards the requirements the service providers must meet and not towards standardising quality of the provided services, which would lead to improvement of the users' lives. The existing regulatory framework does not reflect basic principles regarding quality of services, such as good management, partnership, respecting the rights of the clients, systematic and holistic approach in the process of evaluation and planning, active participation of the users, or emphasis on changing quality of life in through results for children and families.

The existing standards are developed too generally and do not reflect the overall quality of the services, e.g. organisational aspects, quality of the process of service provision and mostly benefits/changes/results for the children and families from the service provision.

Data collection and analysis are mainly conducted through monitoring; the data collected follows the process of service provision, but the data is not used as a basis for real assessment of service quality or assessed in terms of change in the user's life. The legislation relatively clearly regulates the power of the controlling authorities: the Agency for Social Assistance and the State Agency for Child Protection. It is unclear, however, how the two institutions interact and in which cases such interaction is necessary.

Relevance

The national system of criteria and standards for social services is not directly responsive to the system's needs, which are supposed to be focused on quality development of social services. Because the system does not focus on results, the standards' relevance to client needs is questionable. There is no systematic monitoring of service quality in place that encompasses indicators such as client quality of life or levels of social inclusion of children at risk.

Effectiveness

The existing standards, criteria and mechanisms for data collection and analysis are effective in assessing requirements of the service providers, but they are less effective in evaluating the process of service delivery, benefits, and outcomes. There is a lack of coherence in data collection, and the data is of limited scope (the data does not effectively include the municipalities) and it is missing a unified national system of indicators related to the quality standards of social services.

Efficiency

The social protection system remains dependent on the national budget. The existing mechanism for data collection and analysis is not efficient; there is a discrepancy between the amount of invested resources and actual impact on service quality. In other words, there is a doubling of resources (two agencies, two teams of professionals, and two budgets) engaged in data collection and monitoring of service provision. At the same time, this monitoring is rather descriptive and doesn't improve quality.

Impact

The data collection mechanism, which is based on quantitative data, reflects mainly the number and type of services, number of clients, clients' socio-economic status, etc., rather than the service quality and actual changes in the life of clients. In that sense, the impact that such a mechanism captures is restricted to only capturing quantitative changes, rather than qualitative changes.

Sustainability

The institutional system is relatively stable in terms of its capacity to collect quantitative data and analyse it, but it fails to use this data at the level of quality measurement.

Recommendations

The existing Ordinances that establish criteria and standards for social services for children have to be updated and should address the main quality principles related to the contextual aspects, process of service delivery, and benefits/outcomes for clients. An integral part of such standards should be a quality assurance framework that will permit monitoring and assessment of service quality. The regulation should clearly indicate one institutional body that will be responsible for data collection, monitoring, analysis and evaluation. The quality standards have to be bound to the vision, goals and priorities of the child protection policy.

Data used to monitor quality can be gathered through automated information systems, or through other reporting mechanisms in place within the one agency or institution. In that sense, the capacity of this institution should be developed purposefully through training and continuous support. An integral part of the data collection mechanism should be case reviews and case records.

An important part of the system should be the feedback mechanism, because client involvement is critical for qualitative data collection. The system should include relevant methodology for gathering data on the perspectives of children and their families, service providers, and the community. The data should be analysed periodically in order to identify the child protection system's strengths and weaknesses. The quality assurance reports that pull together information from data, case reviews, client's feedback and stakeholder input should serve the system update in order to prevent, detect and correct problems in the quality of services provided.

2. BACKGROUND OF THE PROJECT

The Child Protection Hub for South East Europe is a regional initiative operating in eight countries of South East Europe to provide capacity development and networking opportunities for child protection professionals and related workforce to develop and improve the knowledge base available for these professionals in their languages.

Every year, the Hub develops a policy paper on a selected topic of wider interest, in order to explore one aspect of policies affecting children, to identify good practice and to facilitate cross-country learning of different approaches and solutions to similar problems. These papers are the basis of Child Hub's annual thematic conferences. In 2015 the first conference and paper explored multi-disciplinary child protection and collected policy documents and tools that were in use in the region. In 2016 the impact of decentralisation on social services was discussed at the annual conference and a series of papers from 9 countries described the national situation.

In 2017 Child Hub produced papers describing existing standards, regulations, indicators and systems for the monitoring of the quality of child protection services in 8 countries (Albania, Bosnia-Herzegovina, Bulgaria, Croatia, Kosovo, Moldova, Romania and Serbia). The existence of standards has been in focus in many countries in the recent past, and the EU has also acknowledged its importance in its Reflection paper, encouraging and asking Member States to follow the 10 principles included. In line with the **European Union's 10 principles of integrated child protection services** the research should assess as to what extent countries comply with *"standards, indicators and tools and systems of monitoring and evaluation which are in place. Systems are effectively regulated and independently monitored and accountable ensuring accessible, quality, child-sensitive services and care for all children"*.¹

Beyond country reports, a regional review should also summarise main similarities among the countries as well as identify potentially promising practices that are worth replicating.

1 9th European Forum on the rights of the child Coordination and cooperation in integrated child protection systems, <https://childhub.org/en/child-protection-online-library/9th-european-forum-rights-child-coordination-and-cooperation-1>

3. KEY CONCEPTS

Accountability: an aspect of governance that implies that governments and elected officials are accountable and answerable to their constituents, the citizens. It implies that beneficiaries are regularly informed of the actions of government agencies and have a say in future actions and activities.

Best Interest of the Child: a child rights principle deriving from the UN Convention on the Rights of the Child. "Assessing the child's best interests is a unique activity that should be undertaken in each individual case, in the light of the specific circumstances of each child or group of children or children in general".²

Case review: in our context, it will mean a process of reviewing lessons learnt from a child protection case in order to improve child protection practices. The review is ideally a public document widely distributed among different institutions and child protection actors.

Child protection services: in our context, it will mean all types of services around the child that supports their proper development, well-being and protection from abuse, exploitation, and neglect. Services can be delivered by state bodies (e.g. centres for child protection), non-governmental organisations (e.g. NGO-run shelters, kindergartens, etc.), church organisations (church-led educational institutions) and even for-profit organisations, based on a service contract with government.

Child-sensitive services: in our context, it will mean the extent to which services (e.g. juvenile justice processes, correctional facilities, victim-protection programs, etc.) are tailored to the specific needs of children, whether the communication within these services is child-friendly, and whether the services are accessible easily for ALL children, including vulnerable populations.

2 General comment No. 14 (2013) on the right of the child to have his or her best interests taken as a primary consideration (art. 3, para. 1)*
http://www2.ohchr.org/English/bodies/crc/docs/GC/CRC_C_GC_14_ENG.pdf

Do-no-harm: the principle of do-no-harm, in our context, will mean that child protection professionals have to minimise harm to children when intervening or acting on their behalf. Professionals always have to weigh in the benefits as well as the potential harm of their interventions.

Institutional care: children who are not under the care of their parents or relatives for any reason are under state care. This may take the form of foster care and kinship care as well as institutional care, when children are living in group homes under the supervision and care of professional child protection professionals.

Promising Practice: a method or technique that has been generally accepted as superior to any alternatives because it produces results that are superior to those achieved by other means or because it has become a standard way of doing things, e.g., a standard way of complying with legal or ethical requirements. For a proper description of good practice please consult FAO's document.

Transparency: transparency, in our context, will mean operating in such a way that it is easy for citizens to see what actions are performed. It guides governments' decisions and policies on the disclosure of information as a measure of accountability.

4. RESEARCH METHODOLOGY

4.1. Research questions

The overall questions this research seeks to answer is: *How does the national government ensure that it can provide necessary oversight over child protection services at different levels of governance in the country, and what are potential promising practices in this regard?*

- What are the policies and laws regulating the monitoring of the quality of child protection services, and what are the tools and methodologies used?
- To what extent is the system providing appropriate oversight over services provided directly by government agencies, institutions and organisations and over services provided by other service providers (including church organisations, non-profits and for-profits)?
- Is the existing system independent, accountable and transparent?
- How does the monitoring and oversight system reflect the best interest of the child?
- What are the strong points of the system?
- What are the weak points of the system?
- What are missing elements of the monitoring system?
- Is there a mechanism to channel in the voice of service users (children and families)? If so, what is this mechanism?
- Have there been any recommendations by international donors, UN or EU institutions regarding the quality mechanisms? If so, have they effected change?

4.2. Approach

The project objectives are addressed by a research approach based on a combination of primary and secondary data sources, utilising the advantages of both desk research and a qualitative approach. The mixed methodology permits analysis of the vertical and horizontal diversity of the social/child protection systems, policies, standards, regulations, indicators and systems for monitoring the quality of child protection services in Bulgaria.

4.3. Desk research

A desk review includes a review of existing laws, regulations, policies, standards and systems, including contractual arrangements, methodologies used, working mechanisms (e.g. structures, committees, etc.), both at national, entity, district levels, actual monitoring reports, or external evaluations, shadow reports of NGOs, or other reviews or evaluations of the child protection system.

4.4. Semi/structured interviews

There are 8 interviews conducted with key stakeholders in Bulgaria in September 2017:

- Representatives of Governmental institutions
- Representatives of Local authorities
- Representatives of NGOs
- Representatives of service providers

The detailed information about interviews is presented in the table below.

Table 1

N		Position	Institution/Organisation
1	Reni Manolova	Director	Department "Child Protection", Agency of Social Assistance
2	Polia Kaniova	Expert	Department "Child Protection", Agency of Social Assistance
3	Tsvetelin Kanev	Expert	State Agency For Child Protection
4	Julia Ivanova	Expert	State Agency For Child Protection
5	Dani Koleva	Programme Director	National network for children
6	Madlen Tanielan	Programme Coordinator 'Family'	National network for children
7	Valentina Simeonova	Programme Director	Know How Centre, New Bulgarian University
8	Vania Shalapatova	Managing Director	For Our Children Foundation

5. GENERAL DESCRIPTION OF THE CHILD PROTECTION SYSTEM AND DESCRIPTION OF THE MEASUREMENT SYSTEM

Regulatory and institutional framework

The legal framework in Bulgaria within which community-based social services are provided is based on the *Social Assistance Act* and the *Regulations for its Application* (SAA and RFASAA). The *Child Protection Act* (CPA), the *Regulations for its Application* (RFACPA) and the *Ordinance on Criteria and Standards of Social Services Provided to Children* (OCSSSPC) are related to social services for children.

The CPA provides a legal definition of “services” as “social services in the usual home environment”.

The Social Assistance Act and the Regulations for its application define the offering of social services as services in the community and services in specialised institutions. The resident type of services is included in the group of community services.³

The Child Protection Act⁴ regularises the rights, principles and measures for child protection; the authorities and municipalities which realise the child protection activities; as well as participation of legal or private entity in such activities. In addition, a requirement for service quality is introduced (via Article 1 of the Child Protection Act) and the measures for protection in a family environment are given a high priority. The placement of a child in a specialised institution is seen as an extreme measure when the possibilities for family support are exhausted. Besides, it is clarified that the execution of protection measures is realised by providing social services. According to the Bulgarian legislation, social service providers in Bulgaria are the state, municipalities, Bulgarian private entities registered in the Companies Act, legal and private entities engaged in commercial activities and legal entities from another country (an EU member state or from the European Economic Area).

The law also regulates a licence procedure for private and legal entities when providing services for children.

3 Social assistance Act, https://www.mlsp.government.bg/ckfinder/userfiles/files/dokumenti/pravilnici/Social_Assistance_Act.rtf
4 Child protection act, https://www.mlsp.government.bg/index.php?section=POLICIESI&I=263&lang=_eng

In the Law on Integration of People with Disabilities, the establishment of conditions and guarantees for equality, social integration and support for people with disabilities is the main goal.⁵

The Ordinance on the Criteria and Standards for Provision of Social Services to Children⁶ determines the standards for social services for children and sets the requirements for service quality. The criteria are the indicators which are used to evaluate the standards, and they are obligatory for the country and the municipalities, for private entities registered in the Companies Act, and for legal entities licensed as service providers.

The regulatory documents, which are indicated above, determine that one social service is considered to be of high quality when: it is accessible, there are written policies and procedures, it meets specific requirements for nutrition, healthcare and facilities, and has competent staff, etc.

Apart from the standards and criteria written in the Ordinance and the Regulations for Application of the Social Assistance Act, the Agency for Social Assistance and the State Agency for Child Protection have developed and affirmed specific methods for provision of some types of social services for children, as well as for older persons. These methods, however, do not have a regulative nature, which means it is impossible to force the service providers to use them or to sanction them if they do not.

5 Law on the integration of people with disabilities
http://adapt.it/adapt-indice-a-z/wp-content/uploads/2014/11/DISABILITIES_2005.pdf

6 Ordinance on the Criteria and Standards for the Provision of Social Services to Children
https://www.mlsp.government.bg/index.php?section=POLICIESI&l=263&lang=_eng

International standards and conventions are the basis of the system.

The change of public policies in the field of social services and the related legislation has its justification in a number of international agreements to which Bulgaria has signed, that is: The UN Convention on the Rights of the Child, the UN Convention on the Rights of Persons with Disabilities, as well as the EU Antidiscrimination Law. The basic principles underpinning these international acts, as well as the established international quality standards of social services have been considered and reflected in the amendments of Bulgarian legislation, and in the process of designing strategic policy documents of the Bulgarian government.⁷

How are the following principles ensured in the CPS?

The existing standards and criteria are oriented towards the process of service provision, and they set the framework and criteria that the social service providers should satisfy. Overall, they only partially guarantee that practitioners have the best interest of the child in mind. The reasons for this are the lack of focus on results for the children, the low level of participation of families in the process of assessment and planning, as well as guaranteeing support for life in a family environment.

Regarding the equal access to services for all categories of children at risk, there is possible access to service provision. However, there are mostly services for support in a resident environment or formal care, at the expense of services in the community. In this sense, the available services, in terms of types and standards for provision, are oriented towards identifying risks rather than toward prevention and support of all at-risk groups. There are no services and standards for communities to support early childhood development, to support children perpetrators or victims of crime, or to support families at risk.

7 Quality of the social services in Bulgaria, <http://bcnl.org/en/analyses/quality-of-the-social-services-in-bulgaria-2008.html>

The available services are mainly social; there are no standards for integrated services, which would include real educational and health components.

Role of civil society in monitoring as well an ombudsman for children

There is no institution that acts specifically as a child ombudsman in the country. In the administration of the national ombudsman, there is a special department for *Rights of children, people with disabilities and discrimination*, but its duties are not connected with controlling the quality of services provided.

A national council for child protection, together with the chairman of the State Agency for Child Protection, has consultative and coordinating functions. It includes representatives of NGOs that work in the area of child protection.

However, this council does not have any direct functions connected to monitoring or assessment of the quality of services provided to children.

The annual report of the National Network for Children 'Notebook' assesses how the government and administration have carried out their state duties towards children in the past year. This is an alternative document that critically and independently presents the citizens' point of view towards the policies for children.⁸

The Bulgarian Helsinki Committee regularly collects data and analyses topics connected to the rights of the children, as well as the process of service provision.⁹

Special measures to monitor institutional care

The process of deinstitutionalisation in the country led to a significant decrease in the number of children living in specialised institutions.

8 The annual report of the National Network for Children 'Notebook' <http://nmd.bg/campaigns/belezhnik/opisanie/>
9 The annual report of the National Network for Children 'Notebook' <http://www.bghelsinki.org/bg/temi/prava-na-decata/>

On 24 February 2010, the Council of Ministers approved the strategic document “Vision for Deinstitutionalisation of Children in Bulgaria” (hereinafter referred to as “Vision”). The document outlines the strategic priorities, concrete objectives and measures for the continuation of the reform of the child and family care system. The reform aims to prevent the placement of children in residential care and provides for the development of new services, including replacement of the system of classic specialized institutions with a network of community-based services. The main objective of the document is to guarantee children’s right to live in a family environment and receive quality care and services according to their individual needs.¹⁰

In spite of this and due to a lack of systematic work with families, a large number of children are placed in different forms of formal care, including family-type centres and/or foster families. The available standards for service provision include resident type services, foster care, and services provided in specialised institutions, without special measures for monitoring those services. Moreover, the available standards and respective criteria for resident type services and institutions are not differentiated with regard to their unique circumstances.

Description of the standards/indicators

By introducing criteria and standards for social services for children, the aim is to:

- Provide a secure and safe environment;
- Protect the interests of the children;
- Improve their general well-being;
- Improve the quality of the existing social services for children;
- Create new social services for children;
- Ensure accessibility of the social services;
- Develop children’s abilities for independent life.

10 Evaluation of the family for every child project in the region of Shumen, Bulgaria
https://www.unicef.bg/assets/NewsPics/2017/PDFs/FFEC_evaluation_report_EN.pdf

The standards have been developed as common result-orientated rules. They provide wide operative independence to the social service provider to achieve the required result through activities and procedures, which correspond to its concepts and capacity.¹¹

The standards and criteria for social service provision for children are divided into several categories: standards for social services for children provided in the community, standards for provision of social services in foster care, standards for social services for children provided in specialised institutions, and resident type services.

It is typical that the developed and applied criteria in the country are oriented towards the provider, i.e. they describe procedures and obligations of the service providers regarding working with children and their families.

Mode of data collection and working mechanism

The Agency for Social Assistance collects data about location of the social service, the number and type of users of the social services, the sources of financing, the building, staff and its qualification on a regular basis, as a part of carrying out its control functions. This information is generalised and analysed every year and included in reports.

Part of the functions of the State Agency for Child Protection is to introduce a specialised information map for collecting data about the activities of service provision for children that have been carried out, including scope of the services, capacity and real number of users, health and educational status of the children, communication with parents, etc., according to previously validated indicators. The data is summarised in reports on an annual basis. Data is also collected about the duration of service usage and reasons for termination of use.

11 Reform of the Child Care System: Taking Stock and Accelerating Action https://www.unicef.org/eca/wg4t1_1.ppt

Mechanisms to include the voice of service users (families and children)

The Ordinance on the Criteria and Standards for Provision of Social Services to Children regulates the obligation of the service provider to create conditions for the child's free expression of opinion and decision-making, as well as inclusion in discussions on matters related to the internal affairs of the specialised institution or the resident type service. In addition, the service provider creates conditions for the child's free expression of opinion and decision-making and inclusion in discussions related to everyday life.

The provider informs the parent, child and/or its legal guardian about the way in which a service is offered by giving them up-to-date information in a suitable form and using an appropriate way of communication.

Despite the written obligations of the service provider, it is notable that the level of participation of children and their parents still includes mainly informing and consulting them. There is no real mechanism for effective participation in the decision-making process regarding the design of the services, or in specific assessments and developing the plan for support.

Mechanisms to provide feedback to service users

The Ordinance on the Criteria and Standards for Provision of Social Services to Children establishes the obligations of service providers both to create possibilities for children to freely file complaints and to create a procedure for protection from violence, abuse and discrimination. The social service providers are obligated to develop a procedure for filing and reviewing complaints made by the children, their parents, and legal guardians or the persons who take care of them, as well as the staff.

Roles and responsibilities

The main institutions with responsibilities regarding child protection, planning, creation, provision and management of the social services in the country are Ministry of Labour and Social Policy, the Ministry of Finance, the Agency for Social Assistance, municipalities, and social service providers.

The chairperson of the State Agency for Child Protection as well as individuals authorized by him or her controls service providers' compliance with quality standards. Such control is implemented by periodic check-ups according to a plan which is approved by the chairperson of the State Agency for Child Protection or by inspections when there are signals of a violation of the standards for quality of social services for children.

The Agency for Social Assistance is the main authority with power to control compliance with the established standards and criteria for providing social services. It also registers the social service providers. The Agency for Social Assistance makes summarised annual reports and analyses of the activity for social assistance in the country.

Gaps in the regulatory framework

The review of national legislation regarding standardisation, monitoring and evaluation of the social services for children shows that the following challenges and omissions in regulations exist:

First, the available standards are oriented mainly towards the obligations the service providers owe while providing the services, and not towards standardising the services' quality, which would lead to improving the life of the users. In this sense, it is notable that basic principles regarding quality of those services, such as good management, partnership, respecting the rights of the clients, systematic and holistic approaches in the process of evaluation and planning, active participation of the users, and emphasis on changing the quality of life of children and families, are not reflected in the existing regulatory framework. The standards and respective criteria for quality of the results for clients are missing.

Second, the existing standards do not reflect the specifics of the different social services. They are developed in a general manner and do not show the whole quality of the organisation regarding service provision, quality of the process of service provision and mostly benefits/changes/results for the children and families from the service provision.

Third, there are problems with collecting and analysing data on the application of standards for social services for children. The data are mainly in the form of monitoring; they follow the process of service provision, but they do not constitute real assessment of the services' quality that would be connected to a change in the users' lives. Because two leading agencies collect data, there are often discrepancies when the data are not the same, and therefore, the data cannot be a basis for real analysis or recommendations.

Fourth, the functions and responsibilities for implementation of different mechanisms for collecting, analysing and controlling standards are duplicated. In reality, two agencies (the Agency for Social Assistance and the State Agency for Child Protection) are engaged in this process. Their actions do not always synchronise and, thus, their analyses do not lead to changing the existing system. The legislation relatively clearly regulates the power of the controlling authorities, but it is unclear how they interact and when interaction is necessary. As a result, control can be uncoordinated, ambiguous and contradictory.

6. ASSESSMENT OF THE SYSTEM

6.1. Relevance

Relevance to policies, priorities, reform agendas in the social protection system

The available system of criteria and standards for service provision, which was developed in 2003, was relevant to the system's developmental needs at that early stage in its creation. The goal of it at that time was to set the basic foundation and the overall scope of the services. However, the existing mechanism is no longer relevant to the system. There is evidence for this both in the respondents' opinions and in the strategic documents on a national level.

According to the opinion of the interviewed stakeholders, the main shortcomings of the existing system of criteria and standards are:

There are key principals that are not integrated, such as child participation, family orientation, etc.

Some key standards are missing, such as those related to the competence of staff and professional development, and an orientation toward benefits and results.

As a whole, the criteria and standards are not quality oriented.¹²

The new agenda for social system reform in Bulgaria includes the development of a law for social services (which would be, historically, the first such law in Bulgaria), the foundation of a new model for financing social services, namely "the money follows the client" and elaboration of a minimal package of social services at the local level. It necessitates the development of a new system of quality standards along with a monitoring and evaluation mechanism.

Relevance to the needs of the system of service provision (service quality)

The existing system for service delivery in Bulgaria has the following requirements and characteristics:

12 Interviews with the stakeholders

- State-delegated social services
- Government-determined list of social services
- Institutionally prescribed regulations for service provision
- Licensing for private service providers
- Minimum quality standards for service delivery
- Financial per capita standards
- Inspections and control of the service providers

The above-mentioned characteristics outline a system where the service providers are obliged to comply with the prescribed regulations. They are highly dependent and the development of quality mechanisms for their services (except the minimum standards) is not obligatory and remains at their own initiative. At the same time, there is no link between the financial mechanism and the quality of services.

As a result, the existing national system of criteria and standards for social services is not relevant to the goal of quality development. The main regulatory instruments in the social protection system are mainly about providing administrative procedural prescription and do not affect the methodological essence of social work, i.e. they are not formulated in terms of statements of quality of social welfare services. The existing standards fail to indicate or reflect goals, guiding principles, approaches and benefits for clients, and do not enhance awareness of the values, knowledge and skills needed to the practice of the social workers or provide a quality assurance mechanism.

In that sense, the system is rigid, not transparent and not open to the clients.

Relevance to the needs of clients

Because the system doesn't include standards or indicators related to benefits for clients, it is not relevant to clients' needs. The main evidence for that can be found in the process of service delivery and outcomes.

On one hand, the only available mechanism for feedback to the service users in Bulgaria is the system for clients' complaints, which is obligatory for service providers. Some organisations develop their own mechanisms for collection and analysis of clients' feedback, though there is no evidence that this analysis influences the service design.

On the other hand, the standards and criteria are not appropriate to assess how child-sensitive the services are.

There is no information on how to measure the changes in the life of family and children ...¹³

Finally, the system is not result-oriented towards the effects and impacts on children. There is no systematic monitoring of indicators based on the quality of life of the clients and the level of social inclusion of children at risk.

6.2 Effectiveness

There are two institutions in Bulgaria that collect data regarding the criteria and standards for social services. The State Agency for Child Protection gathers data on how the children's rights are respected in the process of provision of services, while the Agency for Social Assistance monitors the process and procedures of service delivery. In fact, both institutions collect similar data (although they have different goals): number of users (by type of services), their social, health and educational status, period of usage, entrance and exit from the service, and specific information by risk groups. The system is analysed annually. The analysis is focused around the types of services and the trends of their functioning.

The main identified gaps in the data collection system and factors, impeding the data collection are:

- The lack of coherence in data collection. There are two institutions and often their data are different. It is an issue in the process of needs analysis, planning and development of quality social services.
- The information is collected only for licensed social services and child protection departments. As a whole the municipalities are not fully involved in this process.

13 Interviews with the stakeholders

The municipality is not a subject of monitoring and control related to the quality of social services. It also doesn't control the quality of services of the providers in case of social contracting with NGOs and other providers.¹⁴

- There is no unified national system of indicators related to the quality standards of social services.

The findings on the extent to which the current system can appropriately measure the quality of services are analysed with regard to the main areas of the European Common Quality Framework for Social Service of General Interest. It defines a quality social service¹⁵: as a service where the service delivery process is designed in a way that:

- **Is based on the needs of persons served** and ensures their rights as in the Convention on Children's Rights and the Convention for the Rights of People with Disabilities (including their right to participate in planning the service delivery);
- **Ensures competence of staff** in terms of skilled professionals, good working conditions, available training and development of staff, appropriate staff levels and staff ratio, and volunteers, that staff ensures respect for human dignity, an ethical code for professionals and ensuring safety and security;
- **Service design is comprehensive and person-centred** i.e. services are tailor-made, close to the client's home and affordable; are comprehensive, i.e. holistic approach, promotion of quality of life, seamless provision of services, and access to multi-disciplinary supports and services;
- **Is benefit- and result-oriented**, i.e. seeks to achieve benefits for the user, record outcomes and review results.

The table below presents evidence about the extent to which the system has the potential to measure the quality of services.

14 Interviews with the stakeholders

15 Defined through the European Common Quality Framework for Social Service of General Interest

Table 2

Quality areas	Quality principals	Availability of standards	Availability of data collection mechanism
Based on the needs of persons served	Charter of Rights	The standards are based on the CRPD; the main rights including access to education and healthcare, and non-discrimination are addressed.	Information about respecting the children's rights in the services is not specifically collected. The available information reflects only the educational, health and social status of the child.
	Non-discrimination	The standards don't properly address the right of the child for living in a family environment and to prevent separation.	
	Complaint management	The standards describe a clear procedure about the complaints.	There is no mechanism for collection of specific information regarding the number, type and results of complaints concerning the social service provision.
	Freedom of choice	There are standards affecting freedom of choice and self-determination of the children, though they are not detailed.	The information regarding the implementation of these standards is not collected.
	Access to advocate – support person	The standards determine that the key social worker is in the Child Protection Department. Except for the residential services, there is no standard which requires a support person within the service.	There is no mechanism to collect information about the implementation of the standard.
	Persons served actively involved in decision-making & evaluation	There are standards which prescribe low levels of client participation (family and child), related to information and awareness, rather than consultation and decision making.	There is no mechanism to collect information regarding the participation of the clients in the decision concerning their well-being.
	Empowerment of persons served	In addition the level of family involvement is very low.	

<p>Ensure competence of staff</p>	<p>Skilled professionals</p>	<p>There are standards which prescribe the main requirement to the staff of the services.</p>	<p>The only information about the professionals is their number by type of services, also divided by specialists/non-specialists.</p>
<p>Staff levels and staff ratio</p>	<p>There is no national standard on the staff ratio and workload.</p>	<p>There is no information about staff ratio.</p>	
<p>Training and development of staff</p>	<p>There are standards for training and development of the staff, including initial training, continuous professional development and supervision.</p>	<p>The information related to the total number of trainings is collected. There is no information about the results of the training process.</p>	
<p>Service design is comprehensive and person-centered</p>	<p>Tailor-made services</p>	<p>There are standards which require the individual needs assessments and planning to meet the multiple needs of the person served.</p>	<p>There is no mechanism to collect information regarding the needs assessments and planning on individual level.</p>
	<p>Accessibility</p>	<p>There are standards about the location and accessibility of the services.</p>	<p>There is no mechanism to collect information related to the assessment of the accessibility of the services.</p>
	<p>Comprehensiveness Holistic approach Promotion of quality of life</p>	<p>There are no standards to promote the holistic approach, consistency between different services and quality of life.</p>	<p>The lack of standards determines the lack mechanism to collect information on these principals.</p>
<p>Is benefit and result-oriented</p>	<p>Benefits for service users results</p>	<p>The standards are not result-oriented, thus there are no such for benefits for the users, records of outcomes, review and transparency of results.</p>	<p>The lack of standards determines the lack mechanism to collect information on these principals.</p>
	<p>Records of outcomes</p>		
	<p>Reviewing results</p>		<p>Neither the families nor the community are informed about the results and the changes achieved by the social services.</p>
	<p>Transparency of results</p>		

The existing standards, criteria and mechanism for data collection and analysis is effective in the area of requirements to the service providers, while in the domain of process of service delivery, benefits and outcomes it is still less effective.

6.3 Efficiency

The main financial source for the social services delivery in Bulgaria remains the state budget. The leading principle for financing is state subsidy on the basis of per capita standards, which depends on the capacity of the service and the number of clients and doesn't take into account the service quality.

Resources invested in the data collection mechanism

The existing data collection mechanism is implemented by two national agencies, the Agency for Social Assistance and the State Agency for Child Protection, which doubles the invested resources needed to develop the information system software and human resources for data collection and analysis. Furthermore, in these agencies there are special departments which are engaged in the monitoring and control of service delivery. In spite of the impressive volume of invested human and financial resources, there are significant gaps in the data collection mechanism: the information system of the State Agency for Child Protection is still in construction, the information system of Agency for Social Assistance is still in its pilot phase, and in fact, the data provided by the two agencies does not always coincide.

The allocated financial resources are huge, though the efficiency is doubtful.¹⁶

16 Interviews with the stakeholders

Management of the data collection and analysis

On an annual basis the two agencies develop analyses for the system of social service delivery and child rights. These reports contain information about the actual number of services, service providers, number of clients, good practices, etc. Nevertheless, the reports are not actionable and don't affect the planning and quality assurance process.

There is a chaos in planning, managing and delivery of the social services for children.¹⁷

The social protection system remains dependent on the national budget. The existing mechanism for data collection and analysis is not efficient, due to the discrepancy between the volume of invested resources and lack of impact on the service quality.

6.4. Impact

System level changes

The major changes of the child protection system in Bulgaria during the last decade have been related to the process of deinstitutionalisation. The strategic orientation of the country is clearly towards deinstitutionalising services for children without parental care. Hence, all the efforts were focused on the closure of the existing specialised institutions for the different groups of children and creating models and developing services in the community.

As a result, as mentioned in the "Updated action plan for implementing the national strategy 'Vision of the deinstitutionalisation of children in the Republic of Bulgaria'", the number of specialised institutions for children decreased by 65.7% (from 137 in 2010 to 46 in June 2016), i.e. 91 specialised institutions for children were closed.

A total of 339 social services for children in the community were created and developed, including the resident type services.¹⁸

17

Ibid

18

<https://www.mlsp.government.bg/index.php?section=CONTENT&l=484>

Changes in the life of children and their families

The changes in the life of children can be seen by analysing the data related to number of placements, separations from biological families, service usage etc.

The actual data for the period 2010 – 2016 shows the following tendencies:

- Decreased number of children living in specialised institutions. The number decreased by 82 % for the last 6 years (from 7 587 in 2010 to 1 232 in June 2016).
- The ratio between the number of children in foster families and children in residential services has changed in favour of foster care. (8 705 children are living in foster families and 4 753 children are still in residential care in 2016).¹⁹
- Increased number of children using the social services in the community by almost 3800 within a 6-year period.
- The cases of successful prevention of abandonment are over 13 600.
- There are over 8 400 cases of successful reintegration in the family.
- More than 4 200 children are adopted
- More than 6 306 are living in extended families.

Nevertheless, there has been no significant change in the ratio of children living in a different type of residential setting and foster care. This has resulted in a persistent share of children at risk in formal care.²⁰

The main goal of the existing mechanism is data collection itself. The quantitative data reflects mainly the number and type of services, number of clients, their socio-economic status etc., rather than the service quality. In the context of these findings it can be assumed that the existing system is used for reporting purposes mainly related to the quantitative data itself rather than for evaluation and impact assessment of children's well being.

19 Ibid

20 Formal care: all care provided in a family environment which has been ordered by a competent administrative body or judicial authority, and all care provided in a residential environment, including in private facilities, whether or not as a result of administrative or judicial measures;
https://www.unicef.org/protection/alternative_care_Guidelines-English.pdf
 Specifically, the formal care includes foster care, placement in foster families, social welfare institutions or small group homes, organised living with support and placement in centres for victims of domestic violence.

6.5 Sustainability

The assessment of sustainability of the existing mechanism for data collection and analysis is elaborated through the capacity of the main institutions, professional competence and resources. Additionally, the capacity to measure the quality of social services, e.g. availability of quality standards, indicators and measurement procedures, are considered as an essential part of sustainability. The existing mechanism in Bulgaria is moderately stable in terms of capacity, professional competence and resources. However, it can't be considered sustainable regarding quality measurement, due to the lack of standards, indicators and measurement procedures.

The table below presents the main areas of assessment.

Table 3

Areas	Level of sustainability	Justification
Institutional capacity	MODERATE	There are institutions and specialised departments for data collection and analysis related to social services for children. At the same time there is no specialised training and continuous support for the professionals engaged in this process.
Resources	MODERATE	The information system of the Agency for Social Assistance is operating (though still at a pilot stage). The system of the State Agency for Child Protection is under construction.
Quality measure	LOW	The system is not oriented and adapted to the measurement of quality.

The social protection system in the country reaches the stage of quality development, i.e. there are resources allocated for quality standards development.

7. PROMISING PRACTICES

There are two practices identified related to the quality assurance of social services delivery.

Table 4

Organisation	Know – how centre for alternative care, New Bulgarian University
Rationale	Identified in the process of data collection
Description	The name of the practice is child-centred monitoring. Its main goal is to change the monitoring philosophy, i.e. to turn it into consultation process.
Aspects of quality mechanism	Data collection and analysis of the process of service delivery. Gives a starting point for quality assessment.
Implementation	Child Protection Department and Social Services in the Community
Results	Implemented in 3 country regions. The data is analysed and the professionals find the model very useful.

Table 5

Organisation	For our children Foundation
Rationale	Identified in the process of data collection
Description	The practice is related to the development, implementation and monitoring the progress of children who use social services.
Aspects of quality mechanism	Data collection and analysis of changes in children's development every 3 months.
Implementation	Centre for community support, Residential unit for children under 3 age, Foster care
Results	Implemented in 3 social services in Sofia and Plovdiv region. The data is analysed and the professionals find the model very useful.

8. RECOMMENDATIONS FOR IMPROVEMENT

The suggested recommendations are summary of recommendations of the interviewed experts and of the analysis. They cover two areas for improvement, regulatory framework and implementation.

For the regulatory framework

To update the existing Ordinance for criteria and standards for social services for children. The updated ordinance should address the main quality principles related to the contextual aspects, process of service delivery and benefits/outcomes for clients. An integral part of it should be a quality assurance framework which will permit monitoring and assessment of service quality.

The quality standards have to be bound to the vision, goals and priorities of the child protection policy.

The basic principles that should be addressed are participation of children and families, holistic approach, freedom of choice and promotion of quality of life.

The regulation should clearly indicate one institutional body that will be responsible for data collection, monitoring, analysis and evaluation.

To develop a new model for financing and linking it to the quality standards of services.

For implementation

Data used to monitor quality can be gathered through automated information systems, or through other reporting mechanisms in place within the one agency/institution. The data should be collected by all providers (including municipalities). In that sense, the capacity of this institution should be developed purposefully by trainings and continuous support. An integral part of the data collection mechanism should be case reviews and case records.

An important part of the system should be the feedback mechanism due to the need for client involvement. It should include relevant methodology for data gathering about the perspectives of children and their families, service providers, and the community. Service user feedback is essential so that children's, young people's and their families' views about the services they received are sought and captured within the quality assurance process. This ensures that services match needs and that service users are central to the service delivery. A variety of mechanisms to obtain input from the children and families served by the child welfare system can be used, such as discharge interviews with children and families, periodic focus groups, and surveys. The data should be analysed periodically in order to identify the system's strengths and weaknesses. The quality assurance reports that pull together information from data, case reviews, clients' feedback and stakeholder input should serve the system update in order to prevent, detect, and correct problems in the quality of services provided.

9. ANNEX

Child protection act,

https://www.mlsp.government.bg/index.php?section=POLICIESI&l=263&lang=_eng

10. LITERATURE

Mapping of EU country child protection systems by the Fundamental Rights Agency:

<http://fra.europa.eu/en/publication/2015/mapping-child-protection-systems-eu>

EU's Reflection Paper on Integrated Child Protection System

<https://childhub.org/en/child-protection-online-library/9th-european-forum-rights-child-coordination-and-cooperation-1>

Template for Describing Good Practice

<http://www.fao.org/docrep/019/as547e/as547e.pdf>

Measuring and Monitoring Child Protection Systems - Proposed Regional Core Indicators for East Asia and the Pacific

<http://www.socialserviceworkforce.org/resources/measuring-and-monitoring-child-protection-systems-proposed-regional-core-indicators-east>

Child Protection Resource Pack (UNICEF) – How to Plan, Monitor and Evaluate Child Protection Programmes

<https://www.unicef.org/protection/files/CPR-WEB.pdf>

Social assistance Act,

https://www.mlsp.government.bg/ckfinder/userfiles/files/dokumenti/pravilnici/Social_Assistance_Act.rtf

Child protection act,

https://www.mlsp.government.bg/index.php?section=POLICIESI&l=263&lang=_eng

Law on the integration of people with disabilities

http://adapt.it/adapt-indice-a-z/wp-content/uploads/2014/11/DISABILITIES_2005.pdf

Ordinance on the Criteria and Standards for the Provision of Social Services to Children

https://www.mlsp.government.bg/index.php?section=POLICIESI&l=263&lang=_eng

Quality of the social services in Bulgaria,

<http://bcnl.org/en/analyses/quality-of-the-social-services-in-bulgaria-2008.html>

The annual report of the National Network for Children 'Notebook'

<http://nmd.bg/campaigns/belezhnik/opisanie/>

The annual report of the National Network for Children 'Notebook'

<http://www.bghelsinki.org/bg/temi/prava-na-decata/>

Reform of the Child Care System: Taking Stock and Accelerating Action

https://www.unicef.org/eca/wg4t1_1.ppt

European Common Quality Framework for Social Service of General Interest

<http://www.epr.eu/images/EPR/documents/projects/prometheus/CQF%20for%20SSGI%20-%20FINAL%20VERSION.pdf>

Evaluation of the family for every child project in the region of Shumen, Bulgaria

https://www.unicef.bg/assets/NewsPics/2017/PDFs/FFEC_evaluation_report_EN.pdf

Comparing Costs and Benefits of different models of Child Care

https://www.mlsp.government.bg/ckfinder/userfiles/files/politiki/deca%20i%20semeistvo/zakrila%20na%20deteto/DG%20REGIO_2010_Child_care_CBA_BG_FR_20110921.pdf

Updated action plan for implementing the national strategy "Vision of the deinstitutionalization of children in the republic of Bulgaria,

<https://www.mlsp.government.bg/index.php?section=CONTENT&l=484>

