



TO
MS NATALIA EFREMOVA
DEPUTY MINISTER OF LABOUR AND SOCIAL POLICY AND NATIONAL COORDINATOR OF
THE EUROPEAN CHILD GUARANTEE AND
MEMBERS OF THE PERMANENT EXPERT WORKING GROUP FOR SUPPORTING
COORDINATION AND MONITORING OF THE IMPLEMENTATION OF THE ACTION PLAN ON THE
EUROPEAN CHILD GUARANTEE

STATEMENT

by the Childhood 2025 Coalition

on the draft Report on the implementation of Council Recommendation (EU) 2021/1004 on establishing a European Child Guarantee in Bulgaria for the period March 2024 – February 2026.

The Childhood 2025 Coalition is an association of civil society organizations and individual experts dedicated to the cause of child welfare in Bulgaria. For over 15 years, we have been directing our joint efforts towards developing professional resources in the social sphere and improving the quality of care and support for children and families throughout the country. At the same time, we actively advocate for the implementation of evidence-based policies and measures in this field.

With this opinion, we present our position on the draft report on the implementation of the European Child Guarantee Action Plan submitted to the Permanent Expert Working Group (PERG) to support the coordination and monitoring of the implementation of the Action Plan for the European Child Guarantee, a draft report on the implementation of the European Child Guarantee (ECG) in Bulgaria for the period March 2024 – February 2026.

The draft report shows that Bulgaria has made efforts to align its current actions in the field of child welfare with the spirit of the ECD policy. Efforts have also been made to adhere to the structure of the common

European framework for monitoring progress on the ECD, insofar as the report contains a description of processes and activities in the six thematic areas (early childhood education and care, education and school activities, health care, healthy eating, and housing), as well as data on key indicators related to child poverty and social exclusion.

Despite this desire for administrative compliance, the analytical value of the report is limited by significant shortcomings. The report does not provide evidence of the actual impact of the measures taken during the reporting period and does not reflect the achievements in direct response to the specific requirements of the European Commission (EC) Recommendation.



Due to the lack of focus on the specific change in the situation of children and families at risk of poverty and social exclusion and the lack of clear dividing lines between the reforms and measures implemented within the framework of the EGD and those under other strategic objectives of the state, the report does not provide an overview of the effectiveness of the EGD in Bulgaria.

We acknowledge the fact that the report identifies a systemic problem with the lack of detailed and reliable data on a number of indicators, which is a serious obstacle to the objective reporting of progress in accordance with the requirements of the EC. (The text explicitly acknowledges that there is a "lack of official statistics and fragmentation of available data on individual groups of disadvantaged children.") We welcome the state's self-critical approach in this regard and its expressed willingness to overcome this problem. We support the implementation of the upcoming actions declared in the report to improve the mechanisms for identifying children at risk of poverty and social exclusion, including the mapping of children living in extreme poverty.

In addition, we draw attention to the following shortcomings in national reporting under the EGD:

A retrospective, narrative style prevails over a factual account of progress for the specific period

When reporting on progress, the report takes a descriptive approach to processes, replacing analysis of actual progress during the reporting period with references to legislative acts and programs from previous periods and their development over time. Instead of assessing the specific effect of measures taken in 2024-2026, the report too often uses general phrases such as "In recent years, our country has taken serious steps...". This historical overview blurs the focus on the current operational implementation of the national EGD plan.

There is no clear distinction between ongoing reforms and those initiated in connection with the EGD

The report fails to demonstrate the specific "added value" of the EGD in its role as a catalyst for new, targeted reforms and an instrument for transforming the way support is provided to precisely defined groups of children.

The EC's explicit requirement in its reporting is to specify whether the reforms described have been undertaken in response to the Recommendation, but the Bulgarian report lacks any indication or analysis of this. The EC explicitly requires that reports specify whether the reforms described were undertaken in response to the Recommendation, but the Bulgarian report lacks any indication or analysis of which legislative or practical changes are interventions initiated specifically because of it, and why they were undertaken (preliminary needs analysis). Thus, the document is largely a mechanical compilation of current national programs and projects, most of which would probably have been implemented even without the EGD, but only with adequate funding. The clearest dividing lines between the EGD measures and all other measures are drawn in the section on funding, but even there, no evidence is cited as to which cases involve qualitatively new measures and which involve ensuring the sustainability of activities from previous periods. The report lacks arguments to show that, due to the requirements of the EGD, the criteria for access to specific existing



services or programs have been changed in order to cover more children at risk. Instead of such an analysis, the document is content with statistical findings that the services are there and are used by a certain number of users, which does not show what has been achieved thanks to the impact of the EGD.

There is no specific reporting on the impact of the EGD on the situation of children at risk of poverty and social exclusion in relation to the total child population.

The report reveals a systematic methodological inconsistency between the defined objectives of the EGD and the statistical data presented. The reporting focuses predominantly on access to universal measures for the entire child population, without isolating and analyzing their specific effect on children at the center of the EGD as a common European policy (the group of children under 18 at risk of poverty and social exclusion, "ARPE," according to the common framework for monitoring progress on the EGD), nor separately on children falling within the target groups identified in the Bulgarian plan for the implementation of the EGD. For example, the abolition of kindergarten fees from 2022 is cited as a major achievement (although it dates from a previous period), but this is a universal measure. The report does not provide an analysis or data on what proportion of children at risk of poverty and social exclusion have actually increased their participation in the education system as a result, compared to children not at risk. Without such data, it is impossible to determine whether free kindergartens are a measure that actually reduces inequalities or simply helps families who already have access to such services. The same is true of the presentation of the PISA results – the report is limited to overall achievements in reading, mathematics and science, but does not reflect the new EU contextual indicators for the quality of the educational environment or access to digital learning materials for children in need. There is also a critical lack of information on the impact of any measures on intergenerational poverty, which is the basis of the long-term goals of the EGD and is declared as a key challenge in the Bulgarian context even in the report itself.

The link between interventions and the strategic change they aim to achieve (the link between activities and results) is not clear.

With regard to interventions, the report focuses predominantly on reporting direct outputs (packages distributed, excursions conducted) and coverage (budgets spent, children reached), but does not analyze the actual impact on the situation of children, i.e. success is measured by the coverage achieved. Despite the impressive data cited in this regard, there is a striking lack of information on how these interventions have transformed the quality of life of the children who have benefited from them and what has changed for the families and communities in which they live. The document does not answer the questions of what has had a positive impact on poverty reduction, whether children's educational achievements have improved, or for whom exactly the cycle of material deprivation has been broken thanks to any of the activities and measures described. This lack of quality indicators is evident, for example, in the section on access to healthy food. Although the report lists measures such as "Children's Kitchen" and the "Support for the Youngest" project, there is no specific information on the proportion of children at risk who have guaranteed access to at least one free healthy meal every day. Thus, the reporting remains at the level of "number of meals distributed" without



analyzing the extent to which the strategic objective of the EGD to eliminate food insecurity among the most vulnerable groups has been achieved.

There are no indications of analysis and planning in relation to the actual shortage of services

Last but not least, there is no comparison between the actual number of children from the target groups under the EGD who need specific forms of support, such as those developed as EGD measures, and the capacity of the system to cover them. The document limits itself to stating that activities are being carried out (e.g., in relation to Bulgarian language training or support for young people leaving care), but there is no information on a preliminary analysis of what proportion of children need this type of support and statistics on what proportion of those in need remain uncovered, despite the provision of support where it is available. Without such an analysis, the conclusions that increased funding automatically guarantees expanded access and higher quality remain unfounded. Growth in investment is a necessary but insufficient condition if it is not accompanied by targeted efforts to remove barriers specifically faced by children and families at risk in accessing services and support.

Based on these arguments, the position of the Childhood 2025 Coalition is that the current draft report needs to be revised in order to meet the EC's requirements for transparency and analysis, but also specifically on the question of whether the actions taken during the reporting period have led to a real improvement in the lives of children covered by the ECD. In the long term, national reporting on the ECD needs to be rethought in this regard.

1. Data showing the scope of key measures specifically for children at risk of poverty and social exclusion in line with the EC's 2025 monitoring framework, as well as more specifically for target groups under the national plan for the EGD.
2. Conducting an in-depth analysis of the impact of the measures implemented, as specifically listed in the two-year work plans under the EGD in Bulgaria. The analysis should be supplemented with qualitative indicators that assess how the implemented projects have affected specific aspects of child well-being, e.g., separation of children from their families, educational outcomes, health status, housing conditions.
3. Inclusion of data on "unmet needs" – to account for the discrepancy between children who need a certain form of support and those who actually receive it. An analysis of the barriers to accessing support in this sense is needed in order to identify which children from which target groups actually receive support and which do not.
4. Justification of negative trends and expert analysis of the reasons for the lack of progress on certain indicators in order to outline specific corrective measures by 2030.
5. Identifying the "added value" of the EGD by clearly distinguishing reforms initiated in direct response to the Recommendation from the system's ongoing routine activities in order to highlight the catalytic effect of the common European policy in favor of children and families at risk of poverty and social exclusion



The Childhood 2025 Coalition reiterates its readiness to provide expert cooperation with a view to guaranteeing the rights and a better future for every child in Bulgaria.

Yours sincerely

Childhood 2025 Coalition Members

Bulgarian Association for Persons with Intellectual Disabilities (BALIZ) Bulgarian Association of Clinical Psychologists

Bulgarian Helsinki Committee

Hope and Homes for Children – Bulgaria Branch

Know-how Center for Alternative Care for Children, New Bulgarian University Equilibrium Association

Association for Pedagogical and Social Assistance for Children FICE – Bulgaria SOS Children's Villages Bulgaria Association

Polder Foundation For Our Children Foundation



Фондация „Карин дом”

Фондация „Лале”

Фондация „Международна социална служба-
България” Фондация „Сийдър”

Фондация „Карин дом”

Фондация „Надежда за малките”

Валентина Симеонова, член в експертно качество

Бисер Спиров, член в експертно качество

Пламен Стоянов, член в експертно качество

Росица Богалинска-Петрова, член в експертно качество

Харалан Александров, член в експертно качество

За контакт:

Надежда и домове за децата – клон България

Координатор на Коалиция Детство 2025

Боряна Климентова - boryana.hhc@gmail.com; телефон - 0887905902