

Age, Gender and Diversity Participatory Assessment 2021

I. Executive Summary

In 2021, the total number of the focus group discussions conducted as part of the AGD PA was 25, encompassing 288 persons of concern in the period August-October. They involved multi-functional teams, consisting of 25 representatives of 12 state entities and non-governmental organisations. Focus groups took place in five of the six SAR accommodation centres (except for Transit Centre Pastrogor); in the two Special Centres for Temporary Accommodation of Foreigners (SCTAFs) under the Ministry of Interior, as well as at external addresses with beneficiaries of international protection in Sofia, Stara Zagora and Plovdiv.

Two main tendencies marked 2021 and added additional challenges to the work of state and non-governmental actors. First, some of the **long-lasting consequences of the COVID-19 pandemic** affected the available services and resulted in quarantine periods in substandard conditions, usually in SCTAFs, restricted presence of the NGOs in the reception centres, decrease in school enrolment and attendance and in economic opportunities. Second, the **rising number of asylum-seekers** - more than three times in comparison to 2020, as well as the rising percentage of unaccompanied children required additional financial and human resources in both state institutions and NGOs which were not always available.

Positive developments:

- Increased numbers of respondents report improved access to interpretation at police stations, including UAMs;
- Increased number of respondents are informed and assisted for submitting their asylum applications by the staff of the SCTAFs;
- All RSD interviews are audio recorded with a general level of satisfaction on the space given to asylum-seekers for sharing the necessary information during the interviews;
- Asylum-seekers report satisfaction from the level of information provided to them in the reception centres in Sofia;
- Improved identification and individual approach to vulnerable asylum-seekers in Sofia;

- No reported cases of xenophobia and discrimination by society.

Remaining challenges:

- Record high number of reported pushbacks;
- Record high number of reported cases of violence and illegal appropriation of personal belongings by Border Police or other police officials;
- Prevailing placement in detention of persons apprehended at the border instead for their referral to the SAR;
- Prolonged detention due to quarantine periods;
- Increased complaints from substandard detention conditions, including lack of access to toilets during the night; lack of adequate medical assistance and medicines; lack of interpretation and information; lack of hygiene materials, etc.
- Record high number of reported cases of physical violence in SCTAFs;
- Continuing practice of detention of UAMs;
- Complaints from the interpretation during RSD in RRC Harmanli;
- Low level of information provision to asylum-seekers in RRC Harmanli;
- Lower school enrolment rates compared to previous years;
- Lack of housing options for beneficiaries of international protection;
- Difficulties in accessing financial services, in receiving social benefits for children, in issuing driving licences for beneficiaries of international protection.

II. Asylum Context in Bulgaria in 2021

2021 marked the largest increase in asylum applications since the refugee influx to Bulgaria in 2015-2016, with **10 999 individuals seeking international protection** in the country between 1 January and 31 December¹. This represents an increase of more than three times in comparison to the previous year when the applications stood at 3525. 2021 is also the third consecutive year characterised with rising numbers of asylum-seekers. Nevertheless, those remain twice lower in comparison to 2015-2016, when about 20 000 applications were submitted annually.

The top three countries of origin of asylum-seekers in 2021 remained the same as in 2020: Afghanistan (6026), Syria (3758) and Iraq (479), with these three being on top also for the all-time statistics since the coming into force of the Geneva Convention in 1993². Yet, the year marked an **increase in the percentage of Afghan nationals** seeking international protection, with more than half of all applications being submitted by Afghans³. The other main countries of origin in 2021, similarly to 2020, were Morocco

¹ Data provided by the State Agency for Refugees

² Data provided by the State Agency for Refugees

³ In 2020, this was not the case, with the number of applications by Afghans and Syrians being 1736 and 1089 respectively

(206) and Pakistan (173). As in the previous years, this composition remained relatively steady with slight variations throughout the year.

The State Agency for Refugees (SAR) maintained the number of its open centres at six - Registration and Reception Centre (RRC) Sofia with three facilities in the districts of Ovcha Kupel, Vrazhdebna and Voenna Rampa; RRC Harmanli, RRC Banya and Transit Centre (TC) Pastrogor with an overall capacity of 5160. The only closed-type facility in the Sofia district of Busmantsi remained with a capacity of 30. Yet, all centres have isolation and quarantine spaces where the movement is restricted, with Corpus 1 of RRC Harmanli being the largest such facility. The occupancy rate has been continuously increasing throughout 2021, reaching 48% in December.

The **rate of terminated⁴ refugee status determination procedures** is very high: 2870 terminated procedures out of 6172 decisions taken by SAR in 2021, which represents almost 46% of all decisions. Other 27 procedures were suspended⁵.

This percentage is three times higher in comparison to the one in 2020, when it was about 15% (452 terminated procedures out of 3045 decisions). The vast majority of individuals with terminated procedures in 2021 were from Afghanistan (2102) and Iraq (300). The low **recognition rates** of the two nationalities continues to be lower as compared to other EU MS: the total recognition rate for Afghans in 2021 was 9% in Bulgaria and 71% in the EU. For Iraq, it was 37% in EU and 15% in Bulgaria⁶. Applications by Afghans in Bulgaria continue to be reviewed within accelerated procedures with 735 such rejections and 32 in normal procedures.

Similarly low remained the recognition rates for Pakistanis (5%), Moroccans (0 positive decisions out of 90 decisions overall), Iranians (33%). On the contrary, Syrian citizens kept enjoying a high recognition rate with 20 cases of rejected applications for international protection out of 3758 applications in 2021. The vast majority of Syrians receive humanitarian statuses (1792 out of 1851 persons granted international protection). Overall, the State Agency for Refugees issued 143 refugee status decisions (59 to Syrians, 50 to Afghans, 13 to Iraqis, etc.) and 1876 humanitarian status decisions (1792 to Syrians, 33 to Afghans, 19 to stateless persons). The **total recognition rate** increased to 62% from all determinations on the merits, compared to 37% in 2020.

The number of asylum applications of **unaccompanied and separated children** in 2021 increased sharply: from 799 in 2020 to 3172 in 2021. This represents almost 29% of all asylum applications in Bulgaria for 2021. The majority of these claims were submitted by

⁴ The reasons for termination of a procedure are outlined in Art. 15 (1) of the Law on Asylum and Refugees (LAR).

⁵ Art. 14 which regulated the suspension of a procedure was annulled at the end of 2020

⁶ Source: Eurostat [migr_asydcfst](#)

applicants from Afghanistan (2603). As of 11 January 2022, out of all 3172 unaccompanied minors who applied for asylum in 2021, 425 were accommodated in SAR reception facilities. In 2021, eight were accommodated in mainstream specialised services for children. The data presented points to a persisting high level of secondary migration among these children and the inherent risks of exploitation and trafficking they face along their further route.

In 2021 **no individuals have been resettled** to Bulgaria. On 25 November 2021, the National Council on Migration, Borders, Asylum and Integration adopted a decision for the resettlement of 50 individuals to be resettled from a third country within the 2021-2022 period, but this decision has not been confirmed by the government.

Upon a decision by the Council of Ministers from 25 August 2021, Bulgaria decided to accept **70 persons evacuated from Afghanistan** who have worked for the Bulgarian embassy or for the EU and NATO. By the end of the year, 49 have arrived in the country.

11 UAMs were **relocated to Bulgaria** from Greece.

III. The AGD Approach

UNHCR's Age, Gender and Diversity Policy, adopted in March 2018, refers not only to the annual participatory assessment exercise that all UNHCR operations organise. It is an overarching approach which aims to reinforce the longstanding commitment of the organisation to ensuring that people are at the centre of its work⁷. The end goal of this policy is to guarantee that "persons of concern can enjoy their rights on an equal footing and participate meaningfully in the decisions that affect their lives, families, and communities"⁸. Each person is unique and differences between people, whether actual or perceived, can be defining characteristics that play a central role in determining individuals' opportunities, capacities, needs and vulnerabilities.

The AGD approach promotes gender equality and human rights, particularly women's and children's rights, and protection of all refugees, regardless of their ethnic, social or religious background. It also advances the UNHCR commitments to Accountability to Affected Populations (AAP) principles which place a high value on the meaningful dialogue with refugees, returnees, internally displaced and stateless persons. Both AGD and APP policies aim to ensure that UNHCR's programme interventions and advocacy are shaped by what refugees tell the organisation about their needs, expectations and

⁷ UNHCR, UNHCR Policy on Age, Gender and Diversity, March 2018, <https://www.unhcr.org/5aa13c0c7.pdf>, p. 4

⁸ Ibid., p. 4

aspirations. It requires UNHCR to identify and pursue concrete actions to enable working in partnership with and being accountable to the communities it serves.

Finally, the AGD approach is an intrinsic part of the Global Compact on Refugees, adopted in 2018 and establishing the architecture for a stronger, more predictable, and more equitable international response to large refugee situations.⁹

In light of this guiding principle, in 2021 UNHCR Bulgaria continued with the practice to organise its participatory assessment exercise so as to include as many and as varied persons of concern as possible, in terms of the above-mentioned categories and their locations.

The data collection method uses structured focus group interviews, following standardised questionnaires for asylum-seekers, beneficiaries of international protection and children, which were updated in 2018, and are additionally adapted to each year's operational context. Focus group discussions were conducted not only at almost all accommodation (reception/transit) centres, but also with people of concern living at external addresses in and outside Sofia. The sampling method, deemed best reflecting the AGD approach, is stratification sampling, which ensures proportional representation of all categories of interest, such as age, gender, ethnicity, nationality, and status¹⁰.

In 2021, the focus groups were organised between 2 August and 6 October, with the majority of those taking place in August. This approach differed in comparison to previous years when the group discussions took place within a longer timeframe. The rationale behind this year's approach was the COVID-19 pandemic. The summer months marked lowest numbers of cases in Bulgaria and allowed for in-person meetings. Due to the anonymity of participation, the number of repeat participants cannot be definitively ascertained, but their number varies between 5 and 10 individuals. The interviews were conducted by multifunctional teams, which, due to COVID-19 restrictions, included only three persons: interviewer, note-taker and interpreter.

A concluding workshop on the AGD PA exercise took place on 26-27 October 2021. Members of the multi-functional teams participated in the event and shared their observations on the data collected throughout the participatory assessment, outlining the areas of improvement, prioritising areas of concern and suggesting recommendations for further actions. This report is based on the data collected in the PA process and reflects the final discussions which took place during the concluding meeting.

⁹ UNHCR, The Global Compact on Refugees. UNHCR Quick Guide, p. 4-5, <https://www.unhcr.org/5b6d574a7>

¹⁰ The sampling principle taking precedence in the formation of the focus groups is the language spoken (in view of the practical provision of interpretation from Arabic, Farsi, and English), followed by the legal status of the persons of concern (asylum-seekers or beneficiaries of international protection).

Like any research, the methodology of the AGD PA has its limitations. Due to the fact that the main source of information are the asylum-seekers and beneficiaries of international protection, the identified positive developments, gaps and recommendations are limited to the information available to them as part of their lived experience. The PA does not fully reflect the development of procedural, policy or legislative changes unless these are experienced directly and in practice by the participants in the focus group discussions. At the same time, the results of the PA aim to improve the existing legal framework, procedures, policies, and practices through active advocacy on the part of all members of the multi-functional teams that conducted the PA.

IV. The 2021 Age, Gender and Diversity PA

1. Overview of the focus groups

In 2021, the total number of focus group discussions conducted was 25, encompassing 288 persons of concern. They involved multi-functional teams, consisting of 25 representatives of 12 state entities and non-governmental organisations, namely the State Agency for Refugees, Ovcha Kupel district of Sofia Municipality, UNHCR, UNICEF, Bulgarian Red Cross, Bulgarian Helsinki Committee, Council of Refugee Women, Bulgarian Council on Refugees and Migrants, Mission Wings Foundation, Caritas Sofia, Sofia University “St. Kliment Ohridski”, Refugee Advisory Board. The average number of respondents per focus group was 11.

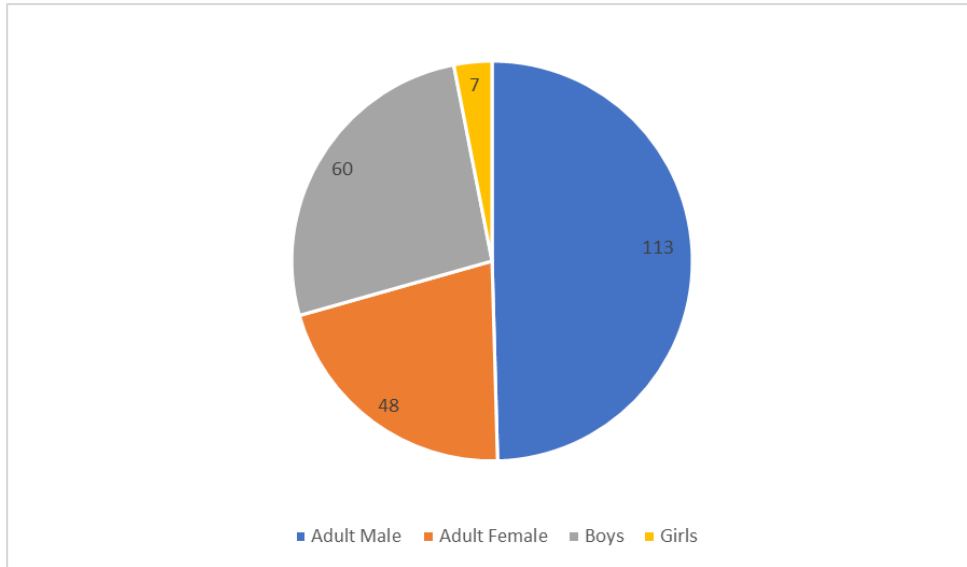
16 focus groups with persons of concern in five of the six SAR accommodation centres (with the exception of TC Pastrogor) were conducted. Four focus groups took place in the two Special Centres for Temporary Accommodation of Foreigners (SCTAFs) under the Ministry of Interior (two in each of the two centres in Busmantsi and in Lyubimets). Five focus groups, mainly with beneficiaries of international protection living at external addresses, were organised: three in Sofia, one in Stara Zagora and one in Plovdiv.

By legal status, there were 13 group discussions with asylum-seekers and five groups with beneficiaries of international protection (the remaining eight groups were mixed). By age and gender, eight groups were with men only, three with women only, six with children and youth (10-17), including unaccompanied and separated children (the remaining groups were mixed). 16 focus groups were held in Arabic with respondents originating from Syria, Iraq, Tunisia, Morocco, Egypt, Palestine, Yemen and Algeria; eight focus groups in Farsi/Dari and Pashto with respondents originating from Afghanistan, and one focus group was held in French and Spanish with respondents from Cuba and Guinea.

2. Profile of the Participants

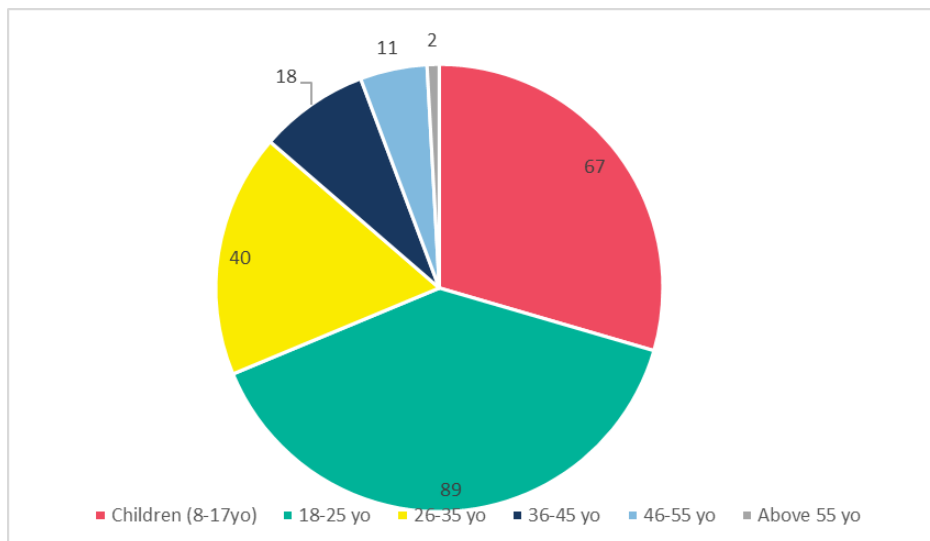
228 respondents took part in the focus groups, with the youngest participant being 8 years old and the oldest - 58. In terms of legal status, the larger majority were asylum-seekers: 169, while the number of beneficiaries of international protection interviewed were 59.

According to gender, the profile of the respondents is presented in the following graph:

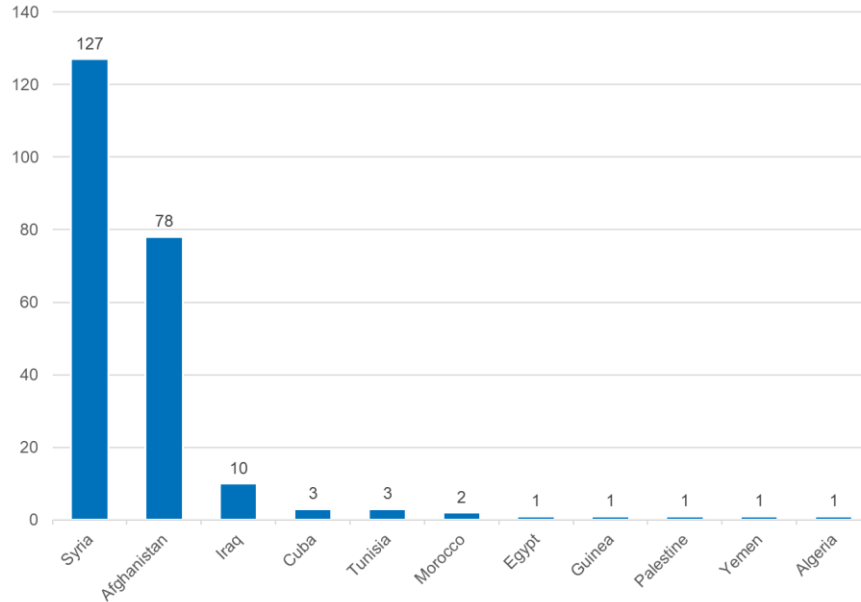


59 of all 67 children interviewed were unaccompanied minors. Three of the UAMs were girls.

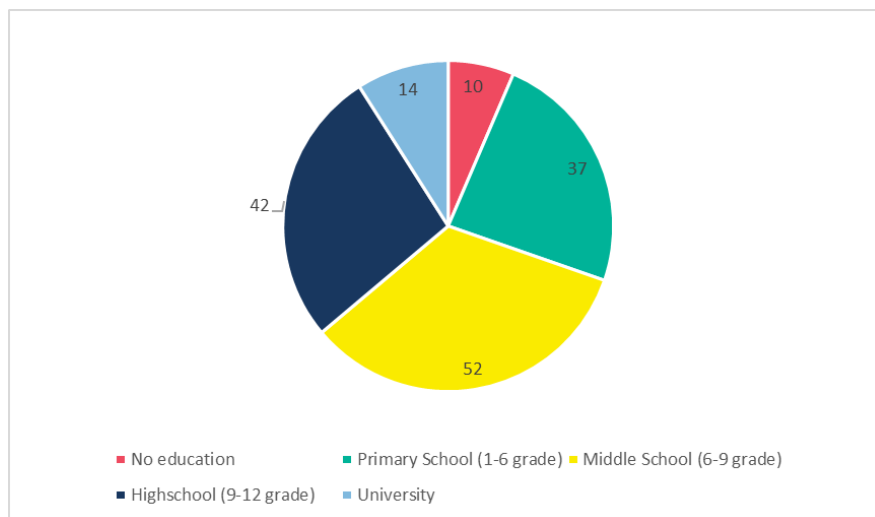
In terms of age, the profile of the respondents is presented in the following graph:



In terms of nationalities, the distribution is the following:



Information on the level of education of the participants in the 2021 AGD PA is available for 155 of the 221 adult participants.



Without surprise, the educational profiles resemble the data shared by SAR on a monthly basis about asylum-seekers educational backgrounds. As visible in the graph above, the largest percentage of interviewees have declared to have basic education (which in Syria and Afghanistan means sixth-ninth grade), followed by those who claim to have graduated grades from the secondary education. About a third of all people have studied up to six years, while less than 10% of the respondents have declared to be either illiterate (6%), or with higher education (9%).

Only 41 interviewees share that they have original diplomas from various stages of their educational path, with only six having those documents with them in Bulgaria.

The qualifications of those who have university diplomas are: Arabic philology (2), pedagogy (2), IT, public administration, medicine, engineering, geology, topography, tourism.

The employment background of the participants is determined by their legal status (asylum-seekers have the right to work after the third month after the submission of their asylum claim). Due to the much larger number of newly arrived asylum-seekers interviewed, only 54 of the adult participants have official right to join the labour market¹¹. Information is collected for 48 of them. 13 have stated that they are employed at the time of the focus group, six having official labour contracts. Two of those 13, are women. One person, beneficiary of international protection, is an entrepreneur, having his own business of car repair. Another 22 persons are in search of employment.

The economic sectors where people are employed are fast-food food chains, construction, logistics (warehouse workers), factory production (i.e. of plastics). One of the responders is a truck driver, using a driving licence issued by Turkey, due to inability to have one in Bulgaria.

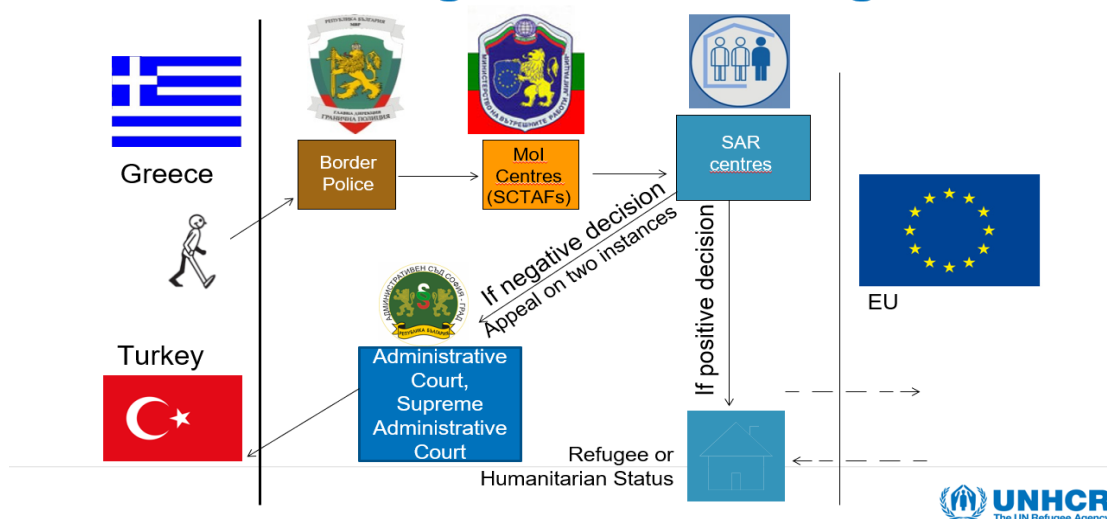
None of the interviewed individuals has been registered or has benefitted from the services of the Labour Bureaux, run by the national Employment Agency.

3. Key Findings of the 2021 AGD PA

The findings of the focus groups are organised along the various stages of the asylum procedure, from access to Bulgarian territory to integration. Those are illustrated in the following graph:

¹¹ According to Art. 29(3) asylum-seekers have the right to work after three months upon submission of their international protection claim. LAR

The Refugee Path in Bulgaria



3.1. ACCESS TO TERRITORY AND TO RSDP

The AGD PA 2021 results mark a substantial deterioration with regard to access to Bulgarian territory in comparison to all previous assessments.

Quote: “The Bulgarian border is a place where laws do not exist. It has its own cruel laws.”

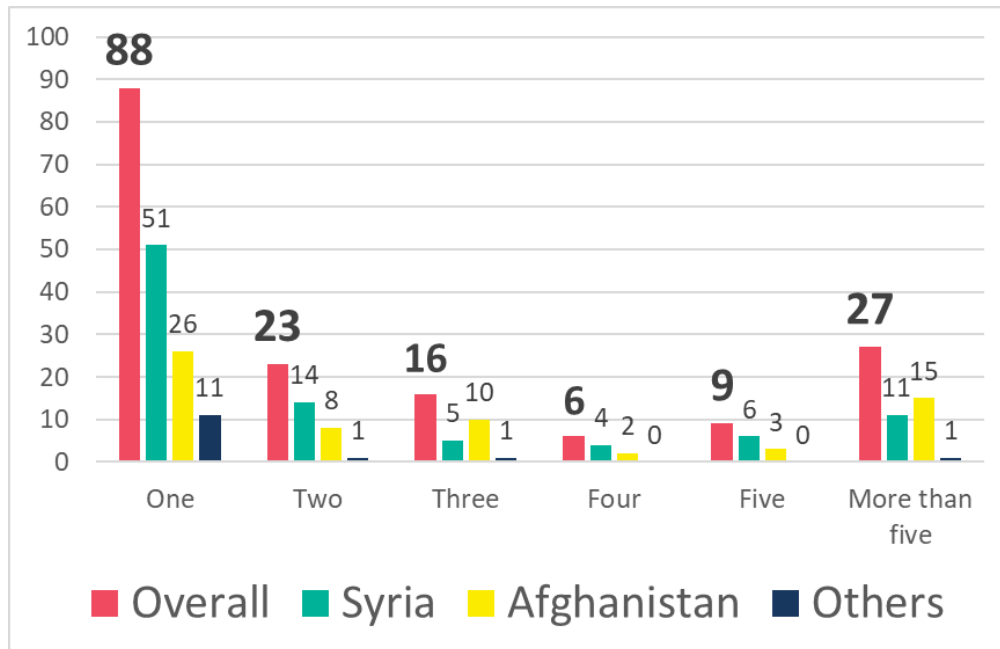
Male, 29, asylum-seeker, Syria

22 persons out of all 169 responders¹² reported having entered legally (either on visa, using family reunification procedures or under relocation schemes of the EU). All others had no legal avenue to seek international protection in Bulgaria and had to enter irregularly. The majority of interviewees have entered the country from Turkey, with lower number of reported entries from Greece¹³.

Out of the rest 147 persons who have answered a question about their irregular entry, 88 report to have managed to cross into Bulgaria on their first attempt. The others report two, three or more attempts, with 27 individuals having more than five. The record number was reported to be 15 by an unaccompanied minor from Afghanistan. The following graph shows the number of entry attempts by nationality:

¹² Those are the number of people who have replied to the question: “When and on which attempt did you enter Bulgaria”

¹³ Out of 151 persons who have answered the questions about place of their border crossing, 116 claim to have crossed from Turkey and 35 from Greece.



"We were caught after walking for about two hours. They put us in a police car and took us back to the fence. They opened a door in it. A policeman was standing at the door with a baton, and each of us was hit on the head with the baton before being kicked back into Turkey".
Male, 23, asylum-seeker, Afghanistan

The trend that Syrians face the lowest and Afghans the highest risk of being pushed back during their access to territory is still persisting: 56% of Syrians claim to have entered on their first attempt (51 persons out of 91), while for the Afghans the percentage is 42% (26 out of 62).

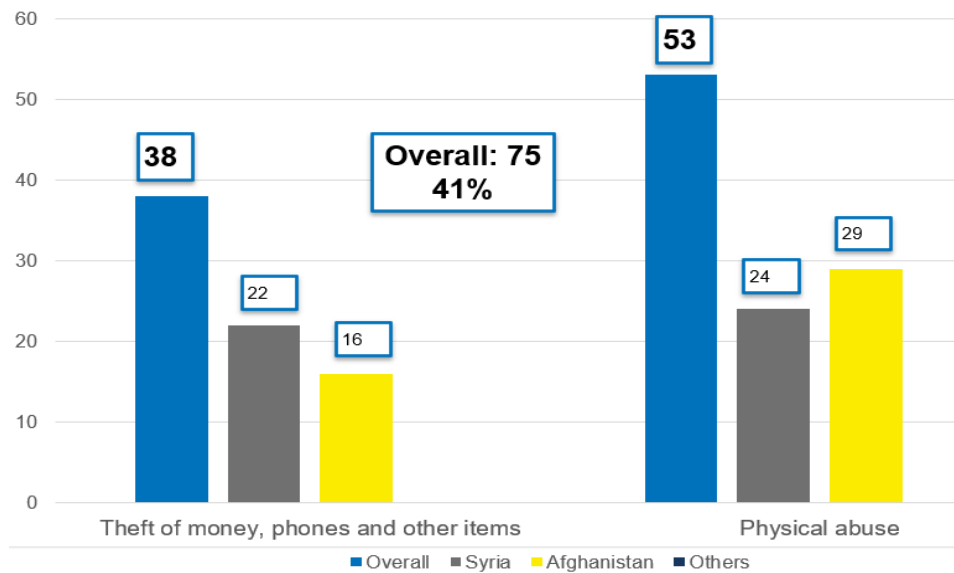
The failed attempts are a result mainly of reported pushbacks of Bulgarian Border Police. According to the Annual Border Monitoring Report of the Tripartite Working Group (Border Police, UNHCR, Bulgarian Helsinki Committee) for 2020 when 1067 pushbacks have been registered affecting 15 173 persons¹⁴. Yet, in some cases, people report that they have been prevented from crossing into Bulgarian territory by the Greek or Turkish border officials, or have given up themselves due to various reasons¹⁵.

A record high number of reported abuse (75 out of 181¹⁶) at entry was registered during the 2021 AGD PA.

¹⁴ Annual Border Monitoring Report 2020. <https://www.bghelsinki.org/web/files/reports/145/files/2021-annual-border-monitoring-report-for-2020-bg.pdf>

¹⁵ Such as loss of orientation, exhaustion, bad meteorological conditions, lack of food, injuries, fighting with or abuse by smugglers.

¹⁶ 181 is the overall number of interviewees who have crossed into Bulgaria illegally in the last 12 months preceding the survey



The most prevalent type of maltreatment is physical abuse with 53 persons claiming they have been beaten by the Bulgarian Border Police. The abuse includes beatings with police batons, kicking, bitings by dogs. While both Syrians and Afghans share such experiences, again, as visible in the graph, Afghans are more likely to face violence and maltreatment.

Complaints were registered by the behaviour of the Greek border authorities, as well, with 12 such cases of violence reported. Only one similar incident was reported regarding the Turkish border officials.

"The policemen aligned themselves in two columns and made us run in between, with all of them hitting us from both sides."
Male, 24, asylum-seeker, Afghanistan

"They gathered our backpacks and clothes and set them on fire in a big fire. We were even left without shoes, but it was winter and there was snow."
Boy, 16, asylum-seeker, Afghanistan

Serious concern causes the reporting of widespread unauthorized expropriation of mobile phones and money (35 cases).

"The last time we just didn't bring anything so they wouldn't take it away from us. Five times the police in Bulgaria took all our money and phones. "
Female, 23, asylum-seeker, Syria

Women and small children do not report physical violence but are victims of robbery, as well. 25 of 59 interviewed unaccompanied minors (42%), on the other hand, share the experience of either violence, or expropriation of belongings (or both) at the border.

Like in previous years, none of these complaints from violence and misconduct was officially reported and investigated due to fear of retaliation, among others.

"They stripped us naked, made us lie face down on the ground. We were 40 people. They went through everyone and searched his backpack. They robbed us one by one."

Male, 29, asylum-seeker, Afghanistan

An improvement is registered with regard to access to interpretation both during apprehension and during the first 24 hours, which the majority of individuals confirm having spent at a local police station. 42 persons report the police arranged for interpretation at this initial stage, either in-person or by phone. Yet, according to responders, interpreters help in police questioning regarding their irregular entry and often disregard additional questions or claims. 18 individuals have shared that the interpreters were rude and mistrustful.

Only 19 responders or about 10% of those interviewed who have arrived irregularly in the last two years (181) have been directly referred to the procedure for international protection in the State Agency for Refugees without first being placed in Special Centres for Temporary Accommodation of Foreigners (SCTAF) run by Mol. All those are unaccompanied children. Further, a number of cases were identified where persons appear in person in the centres of SAR, but instead of registering their asylum claims, the SAR staff sends them to the SCTAF where they apply for international protection.

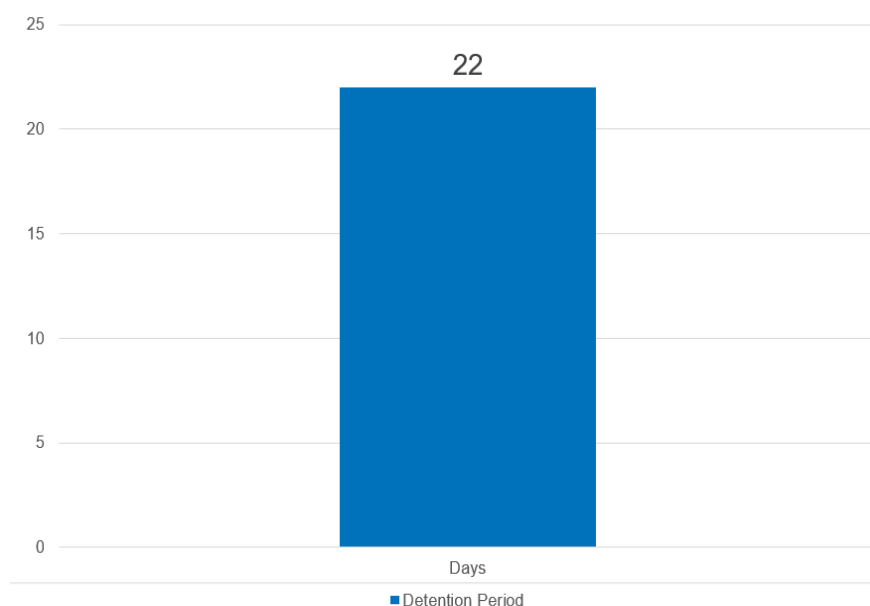
Another 19 responders have been prosecuted of offences for violating the border crossing regime, despite the non-penalization on account of illegal entry in international and national law.¹⁷

3.2. CONDITIONS IN THE SCTAFs

The feedback on the conditions in the two SCTAFs in Busmantsi and in Lyubimets, I, has been exclusively negative in 2021 with complaints much higher in number in comparison to previous years. The unfavourable assessment was provided both by persons still accommodated in these facilities, and others already transferred to the reception centres of the SAR.

¹⁷ Art. 279 (5) of the Penal Code

The average detention period of the interviewed individuals is 22 days, more than 10 days longer than in the years before 2020. This is due to the obligatory period of quarantine as part of COVID-19 measures, which lasts for 14 days, upon which people can apply for international protection. PCR test is carried out at the entry and exit of this quarantine period.



The practice of placing unaccompanied children in detention continues with 40 out of 59 children interviewed, having been placed in either Busmantsi or Lyubimets. This continues to happen through their pairing with an unrelated adult, or their registration as fully aged. This usually occurs due to the inability of the child protection services to step in and provide appropriate alternatives.

The issues identified by the responders are outlined here along the number of complaints registered by the MFTs:

- *Lack of access to toilets and bathrooms between 10 pm and 7 am*

Accommodated individuals, with the exception of those in the family department, have no access to the hygiene facilities during night-time, as corridors and rooms are locked. There is an emergency button that could be pressed, but most responders claim that the staff usually disregards their call.

"Because of the bad food, people have upset stomachs. We ask them to let us go to the toilet, they don't open."

Male, 24, asylum-seeker, Afghanistan

"Even if we die while it is locked, nothing will happen until the morning. People urinate through the window or in their clothes."

Male, 43, asylum-seeker, Syria

- *Lack of adequate medical assistance and lack of medicines*

Although in both centres there is a physician, numerous complaints were registered with regard to the limited access to medical aid due to a lacking system for requesting such an examination. Further, there is no interpretation during the visit to the doctor, with some individuals even forced to pay other accommodated persons for such assistance, and no proper medications.

"You have to be on the list for the doctor - when you arrive, they ask what diseases you have and if you report some, they put you on a list. Later, if you're not on the list - they don't let you see the doctor."

Male, 19, asylum-seeker, Syria

"Doctors give what they have, not what you need. They dissolve a pill in water for everything."

Male, 25, asylum-seeker, Syria

"I have bone cancer. They took my medicine when I arrived and did not give it to me during my stay. The doctor only gave me Panadol."

Male, 29, asylum-seeker, Syria

"It costs 10 leva to go to the doctor with an interpreter so that you can communicate properly. You pay the long-term residents who know the language."

Male, 26, asylum-seeker, Syria

- *Problems related to the quarantine period*

While quarantined, persons are usually accommodated in packed rooms, which they cannot leave for 14 days. Their access to toilets is regulated, allowed only twice a day before going to the canteen. The persons have no access to TV, internet and smartphones or any other recreational activities.

Both in Busmantsi and in Lyubimets, individuals claim that during their quarantine they got sick, but received no assistance. Further, in both centres people who already have been in quarantine report to be mixed with newly arrived individuals, which makes their isolation useless.

- *Lack of information, interpretation and communication with the staff*

Like in previous years, the lack of information and interpretation services in both SCTAFs was brought up by a large part of the respondents. No information sessions take place in

the detention centres. Many respondents shared that policemen often refuse to have any communication with them.

The lack of interpretation in detention facilities results in a lack of information and of a general understanding of the asylum procedure in Bulgaria, as well as in the inability to access services, such as legal aid, medical or psychosocial support. A number of individuals shared that they have signed documents in Bulgarian, which they do not understand. Many of the detainees were not aware of the reasons for their detention upon apprehension by police, their further legal options, the period they have to spend in the SCTAFs, the asylum system or the existing support, despite the available information videos in nine languages, produced by UNHCR. The videos have not been played, with no detainee reporting to have watched those.

Furthermore, respondents in SCTAF Lyubimets complained of restricted access to legal aid. The Bulgarian Helsinki Committee (BHC) has an agreement with the Migration Directorate to provide counselling to all detainees in SCTAF and assists them in submitting asylum applications. While BHC meets all newly accommodated individuals, no referral system is in place for those who have been accommodated for several months and who would like to receive additional legal counselling.

Yet, despite those complaints, the MFT registered a larger number of individuals in comparison to previous years who claim to have been helped to submit an application for international protection by the SCTAF staff.

- *Substandard detention conditions*

Other persisting issues identified during the focus groups are related to the packed rooms, often very hot during the summer, dilapidated beds with infected mattresses, the lack of sufficient food, clothes according to the season, overpriced essential items sold in the local shop (both food and non-food), especially in SCTAF Lyubimets. Further, detainees in SCTAF Lyubimets have not received any hygiene package upon their arrival, thus lacking basic items such as soap for weeks.

- *Problems with other detainees accommodated long-term*

A number of responders shared that individuals who have spent a longer period in detention have established their own rules in the SCTAFs and often request money from newly-arrived individuals for various services. Those include buying a mobile without a camera, cigarettes, interpretation.

The 2021 AGD PA marked a substantial deterioration with regard to violence and maltreatment in the SCTAFs reported by responders. 22 individuals claim to have been either a victim or a witness of physical violence by policemen.

Some of the responders are unaware of the reasons for such actions, while others usually identify as a trigger for such actions their request to visit bathrooms during night-time. Several respondents claimed to have been beaten right after their arrival. It is reported that such maltreatment usually takes place in spaces not covered by CCTV.

"They beat us when we arrived - while we were changing our clothes. There are no surveillance cameras at the site. That's where they beat us. 4-5 uniformed men hit us for no reason, they just laugh and humiliate us".

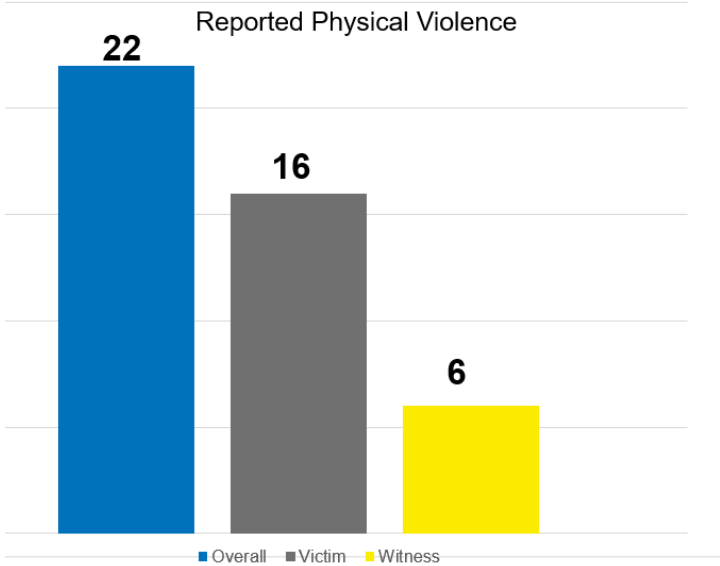
Male, 33, Syria

"I did not understand why I was being beaten. It's likely they wanted to make me respect them."

Boy, 15, Syria

"They beat us like dogs. Every time we ask to go to the toilet. Every time we delay returning from the canteen."

Male, 47, Egypt



"If you follow the rules, you won't have a problem. We even had a prayer room with a carpet: the police respect this place, and I am grateful to them."

Male, 33, Afghanistan

3.3. REFUGEE STATUS DETERMINATION PROCEDURE

The 2021 AGD PA did not identify serious positive developments with regard to the quality of the refugee status determination procedure (RSDP).

The positive trend of all RSD interviews being audio recorded has been preserved with no reported cases of such omissions. In the majority of cases, the protocols of the interviews have been read out and translated to the asylum-seekers, before being signed, especially in Vrazhdebna and Ovcha Kupel reception centres. Gaps in this important procedural guarantee have been identified in RRC Harmanli, especially among Afghan responders, and to a lesser extent in the centre in Voenna Rampa.

Almost all respondents agreed that they had sufficient space to present their refugee story. This is not the case with Afghan asylum-seekers in accelerated procedure who report negative attitudes on the part of the interpreters and challenge the accuracy of the decisions on their asylum claims.

The most serious complaints regarding the quality of interpretation were raised in RRC Harmanli. Participants in all focus groups with Afghan nationals claim that the interpreter in the centre had a negative attitude, openly questioned the credibility of the shared information and did not properly translate their words. Negative feedback was registered also with regard to interpretation to and from Kurdish language.

"Translators are sometimes even worse than police officers, they have a distorted sense of significance because they can decide destinies."

Male, 24, asylum-seeker, Afghanistan

"When I entered for my registration, the interpreter told me: You have one minute. He didn't believe my age. He interrupted me and challenged every word I said."

Boy, 17, asylum-seeker, Afghanistan

Another issue identified during the focus groups and confirmed by the administration is the delay in RSD interviews in RRC Harmanli due to the low number of interpreters.

Responders in RRC Harmanli raised a concern that they do not get informed in advance of the date and time of their RSD interviews. Thus, asylum-seekers risk missing their appointment due to a lack of information. Even if they are in the centre, an accommodation officer unexpectedly enters their rooms and collects their registration cards, inviting them to an interview without any time for mental preparation, collection of documents, or even proper dressing.

"We kept asking him what would happen to us, he said not to bother him. He just didn't care. "

Boy, 16, asylum-seeker, Syria

The cases of all 46 Afghan nationals interviewed in the reception centres of the SAR as part of the 2021 AGD PA have been considered under an accelerated procedure. These individuals complain about the quality of the RSD and face low recognition rates, as evidenced by the annual statistics of SAR in part I. These discrepancies point to persisting gaps in the quality of the decisions, but those cannot be properly identified through the methodology of the AGD PA.

Seven out of 59 interviewed beneficiaries of international protection have been granted refugee status. These seven are in Bulgaria for more than three years. All interviewed responders who have been granted protection in the last three years are Syrians with humanitarian status.

3.4. RECEPTION CONDITIONS IN SAR

The 2021 AGD PA registered opposing tendencies with regard to the reception conditions in the SAR centres in Sofia and the one in Harmanli.

Accommodated individuals in the three reception centres in Sofia assess the conditions as satisfactory. No particular concerns have been raised about the infrastructure, with the exception of several complaints about the beds and the bathrooms in Voenna Rampa. An improvement in comparison to previous years has been registered with regard to infected blankets and mattresses, with responders associating such issues mainly with the SCTAFs. Women shared satisfaction with the regular supply with baby formula and diapers. An improvement has been registered with regard to access to information, with the majority of responders in Sofia assessing positively their understanding of the asylum procedure and available support and services. Responders with medical issues claim to have received the necessary health assistance and to have been registered with a GP. No security issues or fears were shared with the MFTs.

The highest levels of satisfaction were recorded in the Vrazhdebna centre, where people from four focus groups assessed as most valuable the direct communication channels with the staff, both administrative staff and social experts, which makes them feel comfortable and supported.

“It is a paradise in Vrazhdebna in comparison to Busmantsi. Families have their own rooms, people can cook for themselves, buy products”.
Woman, 23, asylum-seeker, Syria

In Sofia complaints were registered mainly with regard to the amount, quality as well as diversity of the food, including the lack of specialised food for persons with medical/dietary needs. The lack of internet connection was also raised by residents, especially those who

have their children enrolled in school. As main concern during their stay, asylum-seekers pointed the lack of financial resources for covering some basic needs¹⁸.

Some of the interviewees say that they live in extreme poverty. Some of the asylum-seekers claim to have not received on time their monthly allowance of BGN 20.

The levels of satisfaction were much lower in RRC Harmanli. The most common concern registered in the centre is the lack of proper information channels. Interviewed individuals face a hard time to find answers to simple enquiries and have no focal point to turn to. The administration has created a system where accommodated individuals may submit a written request or question, but the process is time-consuming (answers usually take more than a week). Thus, people report and demonstrate very limited understanding of the asylum procedure, available support, their rights and obligations. The presence of NGOs which is restricted under special arrangements due to COVID-19 also undermines individuals' access to services.

This problem is related mainly to the lack of interpretation services for social issues. The interpreters in the centre are exclusively engaged in the registration of newly arrived individuals and RSD interviews, thus, leaving the social experts of the SAR without any channel for communication with accommodated individuals. Respondents unanimously shared they do not know these employees, and in case of a problem, search for information and support among their peers.

The lack of interpretation also undermines access to medical care. The respondents underlined the inability to meet with the doctor in the centre, as he visits it only twice per week and is engaged with COVID-19 vaccinations. Persons complain that when the doctor is on leave, no medical assistance is available for weeks. Further, even if the people manage to get examinations and have prescribed medicines, SAR does not assist in buying those. Persons in need of specialised treatment face difficulty receiving it in the Harmanli hospital, with several respondents claiming examinations were refused by the staff there.

Accommodated individuals in RRC Harmanli further raised issues related to the attitude of some SAR employees, with numerous complaints of humiliating and disrespectful treatment, mainly on the part of some interpreters (see part 3.3.), accommodation staff and security. There were reports of yelling and usage of derogatory words, unexpected entering into rooms, seizure of registration cards, even destruction of personal property.

¹⁸ Asylum-seekers receive 20 leva per month by the SAR

3.5. UNACCOMPANIED CHILDREN

59 unaccompanied children were interviewed within the participatory assessment within six focus groups in RRC Harmanli and RRC Sofia (the safe zones of Ovcha Kupel and Voenna Rampa). Their early identification and subsequent channelling through child protection services continue to be weak.

As mentioned in part 3.2., 40 out of 59 children have been detained in the SCTAF despite the explicit prohibition of such arrangement under the Law on Foreigners (Art. 44 (9)). This likely finds its cause in the difficulties of the respective field staff to ensure the application of the special safeguards for UAMs stipulated by law, such as the provision of special protection and care in accordance with the child's best interests (lack of interpretation and incurred transportation costs, among others). Like in the previous years, an assessment of children's needs and their best interests is done only in exceptional cases before taking decisions that affect the well-being of children.

The majority of interviewed UAMs did not demonstrate understanding of the role of their legal representative from the National Bureau for Legal Aid and the child protection social experts. Most of them have never spoken to them and have seen those only during their RSD interviews. Continuous support, guidance, supervision and counselling is not provided to most of the interviewed UAMs by their representatives and child protection social workers. Only one of the interviewed children claimed to have the phone number of his representative and knows how to reach him.

Further, the vast majority of unaccompanied children remain out of the educational system. A handful of the interviewed participants have been enrolled to Bulgarian schools. No one of them has actively participated in classes. The main reason children outline is the online learning environment and the lack of Bulgarian language knowledge. Without any introductory training in Bulgarian, children easily lose interest and motivation to take part in classes. Almost none of the interviewed children could spell out the name of his/her teacher, or even his grade and name of the school.

"I prefer to sleep until noon. Then we go for a walk and play games on the phone at night."

Boy, 16, asylum-seeker, Afghanistan

With regard to reception conditions, UAMs expressed a high level of satisfaction from both safe zones in Sofia. Youth in Voenna Rampa underlined their good communication and trust established with the social workers of IOM, who run the compound. Concerns were raised in Ovcha Kupel with regard to the attitude towards the children by some of the accommodation and security personnel.

Furthermore, after being granted protection or rejected, UAMs are rarely accommodated in appropriate social services, due to a lack of sufficient capacity on the part of the child protection system. Children granted international protection are unable to obtain personal documents due to the lack of a permanent address. They usually remain in the RRCs. As a result of those problems, most UASCs abscond.

Special focus groups took place with the 12 of the relocated boys from Greece. At the time of the interviews, the boys have already been granted protection and were accommodated in flats rented by Ovcha Kupel district of Sofia municipality. The boys had all spent more than one year on the Greek island before arriving in Bulgaria. In Greece, they had been informed about the asylum system in Bulgaria and had the freedom to choose if they want to travel, or not. It took between four and five months from their official signing for relocation until their actual departure to Bulgaria.

The boys were particularly disappointed with their stay in RRC Harmanli right after their arrival in the country. They claimed to have been left without any information, support and activities, including access to school, for more than half a year. They had no channels for discovering when and where they will be transferred. Although they felt much better in their new flats, they raised the concern that they were still not enrolled in the educational system.

"Harmanli is a place without opportunities. Empty space. We slept under the sky on Lesbos, but we have never been so disillusioned. We had no choice but to sleep."

Boy, 17, humanitarian status, Afghanistan

"People came to us from all kinds of organizations, took signatures and left. We told them - we have no clothes, no food, take us somewhere, we haven't been out for 4-5 months. When the session is over, they leave. Everyone wanted to meet us, but nothing came of those meetings. "

Boy, 17, humanitarian status, Afghanistan

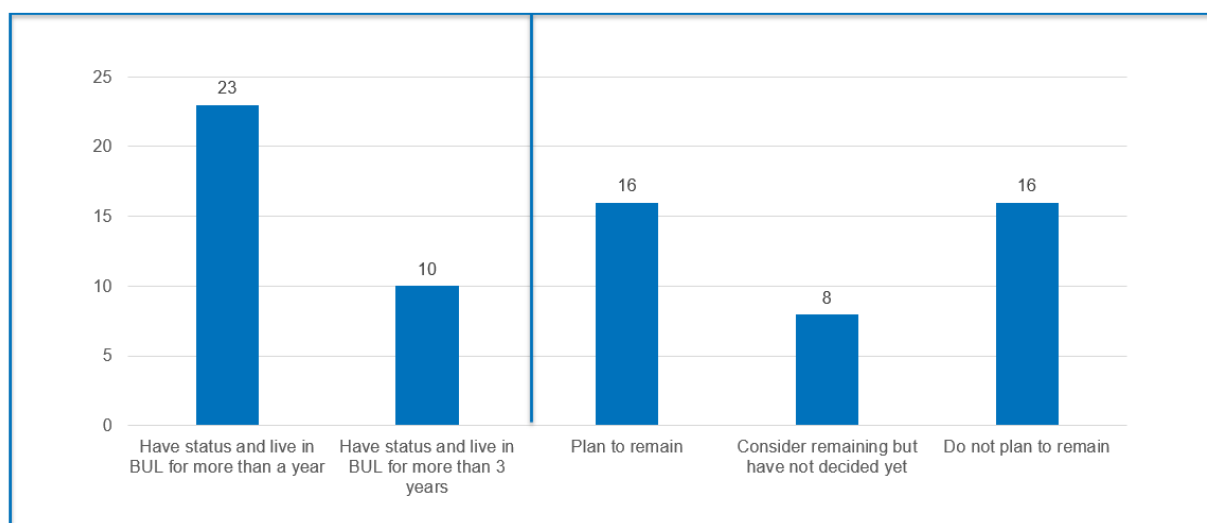
3.6. INTEGRATION AND BENEFICIARIES OF INTERNATIONAL PROTECTION

There is no state institution responsible for integration activities and no selected deputy prime minister to coordinate the process, as per the *Ordinance on the Terms and Conditions for Concluding, Implementing, and Terminating an Integration Agreement for Foreigners Granted Asylum or International Protection*. There is no state budget for integration activities. EU funding, mainly under AMIF is available, but not directly channelled to local authorities and subject to project-based application.

Only five regions of Sofia Municipality have signed integration agreements with refugees since 2017. Municipalities do not have incentives to sign agreements, due to lack of funding, lack of experience in developing and implementing EU projects, lack of experience in refugee integration, and political considerations. There is a lacking mechanism for the identification of individuals willing to remain in the country, and thus, subject to inclusion in integration policies.

Thus, newly recognized refugees face imminent risk of homelessness and social exclusion, as they need to leave the SAR reception centres within 14 days. In this situation, the majority of refugees leave Bulgaria.

The intentions of interviewees to stay or leave are presented in the following table:



Four main motives are put forward by asylum-seekers and refugees as key to their decision to settle in Bulgaria:

- Providing education to their children (easy access to school upon arrival);
- Starting a stable and well-paid job (unlimited access to the labour market);
- A sense of comfort and acceptance by the Bulgarian society,
- Cultural similarities in the way of life between Bulgaria and their countries of origin, which are not found in Western countries.

On the other hand, those who firmly declare their intention to leave the country state as reasons:

- Relatives and friends in other European countries;
- Large community of their compatriots in other European countries;
- Inability to find housing after the end of the international protection procedure and inability to cover basic living expenses;

- The lack of integration support and financial resources in the first months after leaving the SAR centres;
- Bad experience with rude treatment by the police and other representatives of Bulgarian institutions.

The beneficiaries of international protection still residing in SAR reception centres unanimously point to the address registration and finding actual space to live as their biggest problem and concern. Persons sign written warning that they need to leave the reception centres within 14 days.

The inability to identify landlords willing to rent to refugees and provide options for address registration forces almost all individuals to pay several hundred euros for such registration. According to the respondents, the amount usually paid is about 350-400 euros per person. This amount increased by the end of 2021. "Buying" of an address is so common that a number of interviewed BIPs in Harmanli consider it as part of the official procedure.

Most of the refugees interviewed within the AGD PA, who are still accommodated in the SAR centres, have limited contacts with the Bulgarian society and admit that they do not know the Bulgarian culture, history and even the city in which they live. The vast majority of these respondents have not even basic knowledge of Bulgarian language, with such courses lacking in Sofia at the time of the survey. This gap hampers their ability to address their housing, employment, educational and social needs upon the leaving of the centres.

"We need more information: how to move to Sofia, what are the possibilities. I will stay if I find a job and can support my family. "

Male, 33, humanitarian status, Syria

The interviewed refugees already residing at external addresses (30 interviewed individuals, including the 12 relocated boys from Greece) provide a completely different picture. Priority issues identified by the responders are related to housing, but also jobs, language training, access to social assistance, family benefits for children, healthcare, driving licence, bank accounts, etc.

The majority of respondents confess that their financial situation in the country is difficult due to the need to pay rents, take care of large families and employment in low-skilled sectors.

The majority of interviewed refugees live in rented flats which they have found most often with the help of the Arab community or through real estate agencies. Several individuals were assisted by their employers or other Bulgarian acquaintances. One of the families in Plovdiv applied for municipal housing, but their application was not accepted due to restrictive preconditions, such as ten years of residence in the territory of the municipality.

Refugees continue to face the same issue in Sofia with the Municipal Council still working on a new ordinance for more than a year.

"We need more support in the beginning, at least for a few months to have housing. Every day is a battle for survival."

Male, 50, humanitarian status, Syria

Interviewed refugees in Plovdiv and Stara Zagora point to the lack of Bulgarian language training as one of their main concerns. While such options are offered by the non-governmental organizations in Sofia, this is not the case elsewhere due to the lack of state-sponsored language programmes. A positive development in this regard in 2021 was the signing of a contract between the Employment Agency and the Bulgarian Red Cross for the language training of 20 unemployed beneficiaries of international protection (or asylum-seekers with the right to work). Those courses are to start in 2022.

"In Germany, language courses are strictly individualized according to a person's profile and age, and speaking a language other than German is prohibited."

Female, 50, humanitarian status, Syria

Nine out of the 18 adult refugees residing at external addresses are employed, with another three searching for jobs. The majority of them work in construction, car repair, fast food industry, factories. Almost exclusively they have found their jobs with the assistance of the Arab community and work for Arab employers. As greatest concern with regard to employment, respondents underline the access to bank accounts. The issue remains to be an open one, with banks refusing to provide services to refugees due to restrictive application of the Law on the Measures Against Money Laundering¹⁹. It was reported that the lacking access to financial services has prevented participants from signing labour contracts, as employers prefer bank transfers than cash payments to their staff. Further, this gap blocks refugees' ability to receive unemployment, COVID-related or other social benefits, as well as take a credit for a business idea or another need.

A persisting issue reported again by the participants in the AGD PA is the refusal of the Directorates of Social Assistance (DSA) to pay family benefits for children to beneficiaries of international protection. No major change in this discriminatory policy has been registered, although the decisions of the DSA were overturned by administrative courts in 21 cases in 2021. None of the participants reported to have received such benefits.

Further, very few individuals, apart from those in legal employment, arrive to pay their health insurance and have registered with a GP. Several of the respondents were unaware of the necessity to transfer their health insurance instalments from the Personal Foreigner Number - which they receive upon registration in SAR for the duration of their

¹⁹ For more information, see 2021 UNHCR report on access to financial services: <https://www.unhcr.org/bg/wp-content/uploads/sites/18/2021/09/Financial-services-report-final-BG.pdf>

asylum procedure - and the Personal Identification Number, which is the one they have upon receiving international protection and making their civic registration.

A serious concern raised by the respondents is the difficulty in issuing driving licence in Bulgaria: BIPs cannot get their licences recognized and need to undergo the whole training and procedure for receiving a Bulgarian one. The written exam is held in Bulgarian or in English, and an original school certificate is required. As a result, only one of the respondents has confirmed to have managed to issue a driving licence.

The persons who already have refugee or humanitarian status demonstrate a great desire to get to know the Bulgarian way of life and culture. Many say that despite the strong support from the Arab or Afghan communities, they prefer contacts with Bulgarians. Some of the interviewees communicate with Bulgarian neighbours, colleagues, and teachers of their children. Yet, they feel their contacts are not enough which prevents them from learning the language. All respondents who participated in the focus groups declare their readiness to participate in more programmes for cultural and social orientation and are interested in Bulgarian traditions and customs.

***"Since the day I set foot in Stara Zagora, I have never felt like a foreigner again."
Male, 28, humanitarian status, Syria***

For a third consecutive year, none of the respondents - neither in the SAR centres nor at an external address - shares that they have been a victim of xenophobic acts. However, many participants acknowledge the administrative difficulties and prejudices they feel mainly when looking for housing (mass reluctance of landlords to give their homes to refugees) or when communicating with local authorities and banking institutions.

***"Nothing has happened to us that will make us leave Bulgaria. The Bulgarians are very hospitable. We like to go to Borisova Garden."
Female, 21, humanitarian status, Syria***

V. Key Recommendations

The following recommendations have been proposed by both respondents and representatives of the multi-functional teams. They were discussed and consolidated as an outcome of the 2021 AGD PA final seminar. They are divided by types of recommended activity and include the main responsible stakeholders for the implementation of the recommendation in brackets.

5.1. AGD PA 2022 Methodology

- Adapt the questionnaires, to include fewer groups of questions, but more targeted questions which provide the necessary level of details (UNHCR);

- Improve methodology for interviewing UAMs, together with UNICEF and IOM (UNHCR);
- Improve the inclusion of state institutions in the focus groups with refugees, by simultaneously guaranteeing responders' freedom of expression (UNHCR);
- Provide feedback to asylum-seekers and refugees participating in the AGD PA (UNHCR).

5.2. Access to Territory

- Ensure the establishment of a protection-sensitive entry system enabling the identification, access to territory, and swift referral of those who wish to seek asylum (Chief Directorate Border Police and MoI);
- Improve the mechanisms for filing complaints against the misconduct of border officials and disseminate information on these mechanisms among asylum-seekers and refugees (Chief Directorate Border Police);
- Encourage persons who claim to be victims of Border Police misconduct to file official complaints (Chief Directorate Border Police, UNHCR, NGOs);
- Improve access to interpretation at the border, including in border police stations (Chief Directorate Border Police);
- Respect the principle of non-penalisation of irregular entry of refugees (Chief Directorate Border Police, Prosecutors)
- Expand legal pathways to Bulgaria, including through resettlement (Council of Ministers).

5.3. Conditions in the Special Centres for Temporary Accommodation of Foreigners

- Ensure unhindered access to toilets and hygiene facilities, including at night (Directorate Migration);
- Ensure access to adequate medical assistance, including access to a doctor, interpretation during examinations and availability of medicines (Directorate Migration, MoI Hospital)
- Ensure access to information on the asylum procedure, including through UNHCR information videos (Directorate Migration);
- Ensure access to interpretation, including when accommodated individuals need to sign documents (Directorate Migration);
- Improve hygiene and conditions in the rooms, including replacing infected mattresses (Directorate Migration);
- Regularly provide personal hygiene materials (Directorate Migration);
- Terminate the practice of conducting the RSD procedure in the SCTAF (SAR, Directorate Migration);
- Improve the complaint mechanisms and encourage individuals to submit complaints, including in the boxes placed in both centres (Directorate Migration);

- Create recreational activities for accommodated individuals (Directorate Migration, NGOs);
- Facilitate the implementation of measures for alternatives to detention, putting into practice all three options provided for under Art. 44(5) of the Law on Foreigners;
- Terminate the continuing detention of UAMs (Chief Directorate Border Police, Directorate Migration, Agency for Social Assistance).

5.4. Refugee Status Determination Procedure

- Provide access to RSD to individuals who present themselves in one of the SAR centres and would like to submit asylum applications (SAR);
- Ensure individuals are informed in advance about the date and hour of their interview (SAR);
- Ensure consistency in reading out the protocol of the interviews in all reception centres (SAR);
- Improve the quality of interpretation, including through training and regular assessment of interpreters' performance (SAR);
- Ensure the systematic consideration of asylum-seekers vulnerabilities, through the inclusion in the personal file of the vulnerability assessment form prepared by the social experts (SAR);
- Ensure access to legal aid in case of a negative decision (SAR, NBLA).

5.5. Reception Conditions in SAR centres

- Organize regular coordination meetings in each reception centre (SAR);
- Continue improving the infrastructure, especially in the centres in Voenna Rampa and Harmanli (SAR);
- Ensure interpretation for social, health and educational issues (SAR);
- Provide budget for covering medical prescriptions issued by GPs and/or specialists (SAR);
- Improve access to information, including through access to the internet (SAR, UNHCR);
- Improve access to education, including through information and motivation sessions jointly with the Ministry of Education and Science (SAR, MES);
- Facilitate the organization of educational activities for children (SAR, NGOs);
- Improve the quality of food and consider options for food vouchers (SAR);
- Unify the practice of creating integration profiles in all reception centres (SAR);
- Create an accessible and efficient complaint mechanism (SAR);
- Ensure smoother access to job opportunities, including through job announcements and referrals to Labour Bureaux (SAR, Employment Agency);
- Suggest amendments introducing a possibility for vulnerable refugees to remain in SAR registration and reception facilities for a limited, but longer than two weeks

period of time in the Law on Asylum and Refugees and liaise with Social Assistance Directorates to facilitate access to social services (SAR, Agency for Social Assistance, NGO)

- Do not place unaccompanied minors in RRC Harmanli or in other reception centres without dedicated safety arrangements (SAR);
- Assure Bulgarian language training and issue certificates upon completion of the course.

5.6. Unaccompanied children

- Improve identification and referral of UAMs and expand access to the national child protection system (General Directorate Border Police, Agency for Social Assistance, State Agency for Child Protection, SAR);
- Ensure the best interests of the child are a primary consideration in all decisions affecting them from the moment of identification until a solution is found (General Directorate Border Police, Agency for Social Assistance, State Agency for Child Protection, SAR, NGOs);
- Improve access to residential social services through support to them with guidance, interpretation, regular training (UNHCR, SAR, NGOs);
- Improve school attendance through intensive Bulgarian learning and individual educational support (SAR, MES, IOM, NGOs);

5.7. Integration

- Establish a state-led integration system with available funding for municipalities that implement integration activities and coordinating body (Council of Ministers);
- Re-establish the integration centres in SAR reception centres to offer language, vocation and cultural orientation courses during the initial adaptation period (SAR, CoM, Parliament);
- Inform the respective Directorates of Social Assistance for the granting of international protection to vulnerable individuals;
- Stop the discriminatory practice of refusal of family benefits for children to refugees (Agency for Social Assistance);
- Develop guidelines for banking institutions on provision of services to asylum-seekers and refugees in line with the European legislation (Bulgarian National Bank, State Agency for National Security);
- Develop a procedure for access to driving licences for refugees lacking original school certificates (Mol);
- Provide more opportunities for Bulgarian language learning, especially outside Sofia (municipalities, Employment Agency, NGOs);
- Establish a fund for payment of old health insurance instalments in emergency medical cases (NGOs);

- Map Arab businesses offering housing and jobs to refugees (NGOs);
- Further develop the support network for refugees outside Sofia (NGOs);
- Map doctors willing to register and provide services to refugees, especially children (NGOs).

The UNHCR Representation in Bulgaria would like to express its gratitude to all asylum seekers and beneficiaries of international protection for their participation in the 2021 AGD Participatory Assessment, as well as to the experts from various state institutions, and SAR in particular, NGOs and volunteers who supported and contributed to its implementation. Reproduction of this report is permitted, except for commercial purposes, provided an explicit reference to the source.