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## POSITION STATEMENT WITH RECOMMENDATIONS

By  
INTEGRO ASSOCIATION  
AND  
LOCAL ORGANISATIONS - MEMBERS OF  
THE NATIONAL "INTELLECT" COALITION

Subject: The need to strengthen bottom-up approaches in the implementation of the National Policy of the Republic of Bulgaria for Equality, Inclusion and Participation of Roma for the period 2021-2030

In recent years, Integro Association (<https://integrobg.org/>), as member of the European Network of Organisations working at local level - ERGO Network (<https://ergonetWORK.eu/>), has been actively engaged in monitoring and supporting the implementation of the LEADER approach. This approach was transformed in 2014 into the Community Led Local Development - CLLD<sup>1</sup> approach for addressing local issues of the Roma community in Bulgaria

The importance of the Community-Led Local Development approach came on focus after the analyses of the Decade of Roma Inclusion and the European Union Framework for National Roma Integration Strategies 2011-2020. In short, these analyses identified a failure in both initiatives, mainly due to the lack of real Roma participation in policy-making and implementation, as well as due to the inadequate monitoring and evaluation system and weak political commitment<sup>2</sup>. The failures of the two major Roma inclusion initiatives over the past two decades are a clear indication that **paternalistic and top-down funding approaches** to Roma inclusion require an essential review to achieve more positive results.

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<sup>1</sup> The success of LEADER in rural areas opens up other ECI funds for its implementation in other types of areas. In the 2007-2013 period, the approach was successfully transferred to the European Fisheries Fund, and from 2014 it became available in the European Regional Development Fund (ERDF) and the European Social Fund (ESF). For this wider application of the approach, the term "Community-led Local Development" (CLLD) has been used since 2014.

<sup>2</sup> Mirga-Kruszelnicka, A. (2017). Revisiting the EU Roma framework: Assessing the European dimension for the post-2020 future. Open Society Foundations.

On 7 October 2020, the European Commission announced a new 10-year plan to support Roma in the EU. As a result, as a Member State, Bulgaria developed and agreed in May 2022 its National Strategy for Roma Equality, Inclusion and Participation for the period 2021-2030. Although the new EU strategic framework for Roma received a mixed reception from civil society organisations due to a number of gaps in its content, the addition of priorities for Roma **participation and empowerment** was welcomed and is generally considered to be an improvement on the previous framework. Adhering to the concept that excluded individuals and groups need to believe they have the resources to make a difference, the new strategic framework shows an interest in promoting a local, community-based, bottom-up approach in the development, implementation, monitoring and evaluation of the new Roma strategy.

Thus, the two local approaches to be implemented in Bulgaria in the new programming period 2021-2027 - Integrated Territorial Investments (ITIs) and Community-led Local Development (CLLD) - become particularly important for the successful implementation of the new Roma strategy.

The CLLD approach reverses traditional top-down development policy, bringing to the fore the role of local people who take the initiative and form a local partnership that designs and implements an integrated development strategy. The idea is to engage the energy and resources of people and local organisations as development actors, not just as beneficiaries of the resources provided by programmes.

Following the implementation of the CLLD approach in the previous programme period, we have seen the great advantages of funding implemented on the basis of a bottom-up approach. But at the same time, we found that not much funding had been allocated through CLLD to address Roma issues, and that across the board Local Initiative Groups (LIGs) were quite cautious about involving local Roma communities in the planning and implementation of Local Development Strategies (LDS).

Here is a more detailed description of the identified difficulties hindering Roma participation in the CLLD approach in the programming period 2013-2020:

### **1) Low involvement of Roma in Local Initiative Groups (LIG)**

Only 8 LIGs on the territory of Bulgaria have Roma representatives, most of them are individuals and very few are local NGOs. The reasons for the low Roma representation in the LIGs are:

- No targeted information campaigns have been conducted in Roma communities and no efforts have been made for their inclusion and participation in the LIG;

- This predetermined a low awareness of Roma about the opportunities provided by the CLLD and hence a low interest in the process.
  - It should be borne in mind that due to social isolation, difficulties in communicating with representatives of institutions and macro-society, the inability to devote time due to the daily commitment to family subsistence, Roma are a difficult group to reach and there is a need for longer outreach activities with them, conducted on the ground in the neighborhoods, including door-to-door method.

## 2) Low level of Roma participation in the development of LDSs

### **This leads to a low level of addressing Roma issues and needs in Local Development Strategies (LDS).**

Of the 64 funded LDSs, only 12 of them have Roma-targeted measures planned. Even lower is the number of LDSs, development with the involvement of Roma. In most cases the measures were planned at the discretion of municipal officials, the LIG team or non-Roma NGOs carrying out social activities on the territory of the LIG.

As the **Roma themselves have not been involved in the study of the problems** on the basis of which to plan relevant measures in the LDS, in most cases the measures have remained unpopular among the Roma and **no development of a sense of ownership over them has been achieved.**

- There is a need to ensure conditions for more effective implementation of the participatory mechanism of CLLD in relation to Roma already in the process of analysing the needs, problems, potentials of the community and in the planning of the objectives, priorities and measures of the LDS. To this end, Participatory Action Research - PAR - can be applied to provide insight into why it is important to have a community-led funding approach for Roma inclusion. PAR is rooted in the concept that community members are "intellectual beings capable of engaging in critical inquiry into community problems and in the production of viable, usable knowledge."<sup>3</sup> Furthermore, PAR uses the narratives and knowledge of the community itself to create a mechanism to address issues such as poverty, violence and other forms of inequality, as well as for the purposes of social justice and societal transformation<sup>4 5</sup>. In practice, LIGs can conduct participatory community research among Roma by preparing Roma community representatives in advance for the

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<sup>3</sup> Caraballo, L., Lozenski, B. D., Lyiscott, J. J., & Morrell, E. (2017). YPAR and critical epistemologies: Rethinking education research. *Review of Research in Education*, 41(1), 311-336.

<sup>4</sup> Caraballo, L., Lozenski, B. D., Lyiscott, J. J., & Morrell, E. (2017). YPAR and critical epistemologies: Rethinking education research. *Review of Research in Education*, 41(1), 311-336.

<sup>5</sup> McIntyre, A. (2000). Constructing meaning about violence, school, and community: Participatory action research with urban youth. *The Urban Review*, 32, 123-154.

data collection, combined with focused community discussions and in-depth interviews with leaders and other active community members.

It is not enough for donors to provide funds for Roma inclusion. There must be **efforts to empower and mobilize Roma communities and supporters** to make change happen.

### **3) Very few Roma community members and Roma organizations implement projects funded under CLLD**

In most of the implemented projects, Roma were the final beneficiaries of the project activities instead of planning and implementing their own projects. There are several main reasons for this:

- The lack of upfront funding and the need to use their own funds and then wait for verification of the costs is a big challenge for both small organizations and Roma who want to develop their own businesses.
- Low capacity of small organizations to plan and manage projects that are aimed at improving the lives of communities; failing to cope with the high requirements for participation in the announced measures;
- Some of the Roma who want to develop business initiatives refuse to apply for the programme because of bureaucratic procedures that they find difficult to implement.
- Also, they are more often rejected by banks due to their inability to provide collaterals for the paying off the bank loan.

- Consider providing advance payments to small local NGOs willing to apply for LDS procedures;
- Provide training to local NGOs on project proposal development and project management;
- Consider establishing a fund providing interest-free or low-interest loans, without unsecured collateral, for applicants from marginalized communities wishing to develop a project to start or expand a rural/agricultural business;
- Provide facilitated access to grant advisory assistance to support beneficiaries from marginalized communities in implementing their approved projects under LDS measures. To this end, it would be useful to include as an eligible activity in the application guidelines the hiring of consultants with expertise in the field of CLLD and empowerment of disadvantaged communities to support project implementation and capacity building of beneficiaries from marginalised groups.

**4) Local development strategies do not contribute to solving important problems for the Roma community such as poor housing and street infrastructure in Roma neighbourhoods, unemployment and poverty.**

- If at all there are planned measures for socio-economic inclusion of marginalized communities in the LDS, in most cases they are inadequate to the needs of local Roma communities. The availability of only regional and municipal level statistics does not create a clear picture and understanding of the problems in marginalized neighborhoods, which leads to irrelevant planning of measures.
- The Rural Development Programme (RDP) in general, and the CLLD in particular, does not include a measure to improve the housing conditions of marginalised communities, although preliminary analyses prepared for the purposes of the RDP have identified the presence of rural populations living in poor housing conditions. This is confirmed by data from the EU Fundamental Rights Agency and the NSI 2021 survey<sup>6</sup>, according to which a significant number of Roma children from rural areas are being raised in overcrowded, mostly informal housing, with leaking roofs, damp, mould and mildew in the rooms. In the course of our research and fieldwork, we have found in the villages (for example, in the villages of the municipality of Karlovo, Nikolaevo, Gurkovo, Novi Pazar, Provadia, Kameno and others) the existence of an increasing number of informal settlements, with dilapidated housing, without access to clean drinking water for the residents, without sewerage, garbage disposal and other basic utilities.
- Almost all municipalities applying under sub-measure 7.2 for small-scale infrastructure do not include in their projects the improvement of infrastructure in Roma neighbourhoods. They cite various reasons for this, mainly focusing on the inability to invest EU funds in neighbourhoods outside the regulation or without detailed development plans (DDPs).
- Even if they are willing to include Roma neighbourhoods in the projects under sub-measure 7.2, mayors are limited by legal requirements, such as not being allowed to repair streets that do not have access to a main road.
- Smaller municipalities have difficulties in financing the preliminary technical documentation needed to apply for sub-measure 7.2 and other infrastructure projects. The lack of Roma representation in municipal councils precludes the possibility of allocating funds from municipal budgets for the preparation of technical projects for Roma neighbourhoods.
- There is a lack of funding for larger-scale projects to build comprehensive infrastructure in new areas identified by local authorities for residential development, including by marginalised populations.

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<sup>6</sup> Thematic reports of the NSI and the EU Agency for Fundamental Rights in the framework of the project "New approaches to generate data on hard-to-reach populations at risk of violation of their rights" <https://www.noveleea.bg/2022/04/27/%d0%bf%d1%80%d0%b5%d0%b4%d1%81%d1%82%d0%be%d1%8f%d1%89%d0%b0-%d0%ba%d0%be%d0%bd%d1%84%d0%b5%d1%80%d0%b5%d0%bd%d1%86%d0%b8%d1%8f-%d0%bf%d0%be-%d0%bf%d1%80%d0%be%d0%b5%d0%ba%d1%82-bglid-3-001/>

- Lack of funding for surveying, detailed development plans and other regulations for informal residential areas inhabited by marginalized populations.
- The projects implemented to address unemployment among the Roma community are mainly to create temporary employment, which does not achieve a sustainable solution to the employment problem of people from marginalized communities. Measures to develop the social economy and to create social enterprises, which can be particularly important for providing employment in remote areas with low business investment intensity, are lacking.
- In many of the LIGs, local governments has a dominant role in decision-making, although the requirements for local government representation in the LIG are formally met. This has implications for planned measures and the distribution of funding for LDS, especially where the mayor is not on good terms with the local Roma community. In these cases, measures for the Roma are not included in the LDS or, if they are included, they are formal and rather targeted at projects with shifting objectives (e.g. creating work for persons close to the local authority, carrying out meaningless training, consultations, etc.).

#### **SUMMARY OF RECOMMENDATIONS:**

1. Provide funding in the Strategic Plan for Agricultural and Rural Development 2023-227 (SPARDS) and/or through another EU co-financing programme for the CLLD approach for experts with relevant experience to conduct outreach activities in Roma neighbourhoods, including door-to-door and to activate, motivate and facilitate Roma participation both in the Local Initiative Groups (LIG) and in the development of the Local Development Strategies (LDS).
2. Ensure targeted data collection on Roma issues with Roma participation by setting an appropriate criterion in the evaluation of the LDS. The criterion should assess the following components: focused discussions conducted in the Roma community, in-depth interviews with leaders and other active community members, and a community survey for which Roma are trained in advance for data collection.
3. Ensure consistency between the planned measures and the identified needs and issues of the Roma community by setting an appropriate criterion in the evaluation of the LDS.
4. Provide funding for measures in the LDS to build the capacity of local NGOs and other beneficiaries, particularly from disadvantaged communities, to develop and manage projects for the socio-economic inclusion of marginalised groups. Eligible activities under the measure to include training, follow-up coaching and consultancy by experts with relevant experience in the

implementation of CLLD and other empowerment approaches, provided throughout the implementation of projects.

5. Remove the financial barrier to beneficiaries from marginalised groups, including NGOs, to access LDS measures through the provision of advance payment and the creation of an interest-free loan fund, with no requirement for unbearable collateral from the beneficiaries.

6. Reduce bureaucratic hurdles for beneficiaries of LDS measures from marginalised groups, including NGOs, by simplifying administrative procedures and removing unnecessary, burdensome application criteria (e.g. such as the requirement to submit a document certifying that each member of the organisation's governing body is not indebted to the National Revenue Agency /NRA/).

7. Provide multi-fund financing through CLLD for fundamental needs of the most marginalized rural communities, namely:

- to build social housing for the poorest households;
- for the preparation of plans for the regularization of illegal residential areas with marginalized populations (for surveying, land use plans, change of land status, etc.).
- for the construction and/or repair of infrastructure in existing or new residential areas with marginalised populations (electricity, plumbing, streets, pavements, playgrounds, etc.)
- for the construction of social and cultural infrastructure in neighbourhoods with marginalised populations (health and social centres, community centres, children and youth centres, etc.)
- for social enterprises and other economic structures;
- for social outreach to the most marginalised families

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