UNHCR
United Nations High Commissioner for Refugees
Haut Commissariat des Nations Unies pour les réfugiés

Age, Gender, and Diversity (AGD) Participatory Assessment 2022

I. Executive Summary

In 2022, UNHCR conducted the largest Age, Gender, and Diversity (AGD) exercise in recent years. A total of 31 focus group discussions were organized as part of the AGD participatory assessment, with more than 300 refugees and asylum-seekers between August and October. Multi-functional teams with 27 representatives from 11 state entities and non-governmental organisations[1]. Some 15 focus groups took place with Temporary Protection holders and including 11 with people living in private accommodation in Sofia, Varna, Burgas, and Stara Zagora, and four with people accommodated in state-sponsored hotel accommodation and recreational facilities in the resorts of Golden Sands, Primorsko on the Black Sea coast, and Starozagorski Mineralni Bani. Some 16 focus groups took place with asylum seekers and beneficiaries of international protection in all six open type reception centres of the State Agency for Refugees with the Council of Ministers (SAR); SAR's small closed-type facility within the Special Centre for Temporary Accommodation of Foreigners (SCTAF) in Busmantsi; and in the two SCTAFs operated by the Ministry of Interior; and external addresses with beneficiaries of international protection in Sofia.

The positive developments and the remaining challenges are relevant to the 2021 AGD, when only beneficiaries of international protection participated in the focus groups

Positive developments:

- Detention period in the SCTAFs decreased from 22 days in 2021, to 16 days in 2022
- Practice of placing UAMs in detention diminished
- Report of violence while in detention decreased
- Increased numbers of respondents report improved access to interpretation at police stations, including UAMs;
- Initial identification of UAMs improved due to the increase in the number of residential care facilities willing to accept unaccompanied children, as well as SAR designating officers on duty outside working hours and on weekends;
- Larger proportion of interviewed UAMs demonstrated understanding of the role of their legal representative from the National Bureau for Legal Aid.
- 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;
- High level of satisfaction from the reception conditions in RRC Vrazhdebna

[1] UNHCR, UNICEF, Caritas, Sofia University, Bulgarian Council on Refugees and Migrants, Confederation of independent labour unions, Center Nadja, Reachout Foundation, Za dobroto, Smiles for Ukraine, Bulgarian Academy of Sciences

- Asylum-seekers report satisfaction from the level of information provided to them in the reception centres in Sofia;
- No reported cases of xenophobia and discrimination by society.
- The positive trend of all RSD interviews being audio recorded has been preserved with no reported cases of such omissions.

Remaining challenges:

- High number of reported pushbacks;
- High number of reported cases of violence and illegal appropriation of personal belongings by Border Police officials;
- Prevailing placement in detention of persons apprehended at the border instead for their referral to the SAR;
- 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 recreational activities; lack of hygiene materials, etc.;
- Complaints from the interpretation during RSD in RRC Harmanli; and lack of interpretation outside the RSD;
- Delays in issuing decisions in RSD;
- The rate of terminated procedures continued to be high, with the vast majority of asylum seekers absconding;
- Low level of information provision to asylum-seekers in RRC Harmanli; and lack of information at the closed-type centre;
- Substandard reception condition in some reception centres, in RRC Harmanli, in particular;
- UAMs are still accommodated in Harmanli where there is no safe zone. Lack of information for UAMs and impeded communication with legal representatives;
- Most UAMs continue to remain out of the educational system;
- Lack of recreational activities in the reception centres, main complaints from Harmanli and Banya;
- Lack of clothes; dissatisfaction from quality and quantity of food for UAMs;
- Female asylum seekers complain from lack of security in bathrooms at RRC Banya;
- Still no designated state body responsible for integration;
- lacking mechanism for the identification of individuals willing to remain in the country, and thus, subject to inclusion in integration policies;
- Newly recognized refugees face imminent risk of homelessness and social exclusion;
- Lack of housing options for beneficiaries of international protection;

II. Asylum Context in Bulgaria in 2022

In 2022, Europe and Bulgaria received the highest numbers of refugees in decades. The war in Ukraine has caused the fastest growing refugee crisis since the Second World War, with more than 8 million refugees and 5 million internally displaced by the end of the 2022. The activation of the

Temporary Protection Directive on 4 March 2022 allowed for more than 4.8 million refugees from Ukraine to benefit from swift access to basic rights and protection in the European Union.

More than 1 million refugees from Ukraine transited through Bulgaria with thousands of daily arrivals in March, April, and May. The influx was unprecedented and required an extraordinary logistical, financial, and human response from national and local authorities, humanitarian organizations, civil society, and hundreds of volunteers. Most arrivals promptly departed for neighbouring countries but tens of thousands remained. Bulgaria's government swiftly launched an accommodation scheme in seaside hotels in the regions of Burgas, Varna, and Dobrich, by mid-May accommodating some 62,000 refugees from Ukraine. With the start of Bulgaria's tourist season in June, the government reshaped the programme to include state-owned recreational facilities and lower-grade hotels mainly along the coast but also in mountain resorts. By the end of 2022, some 10,000 were benefiting from state-sponsored accommodation and 50,000 remained in the country, according to official estimates (see map below of locations). Predominantly highly educated women, children, and older refugees from Ukraine have remained in Bulgaria. Refugees arrived with significant needs for effective and targeted policies in healthcare, education, Bulgarian language instruction, employment, child protection, and protection from gender-based violence which for years were under capacitated to meet the needs of refugees and asylum-seekers. The challenges in each of these sectors were among the many factors causing which encouraged 95 per cent of refugees fleeing Ukraine who entered Bulgaria leave for other countries.

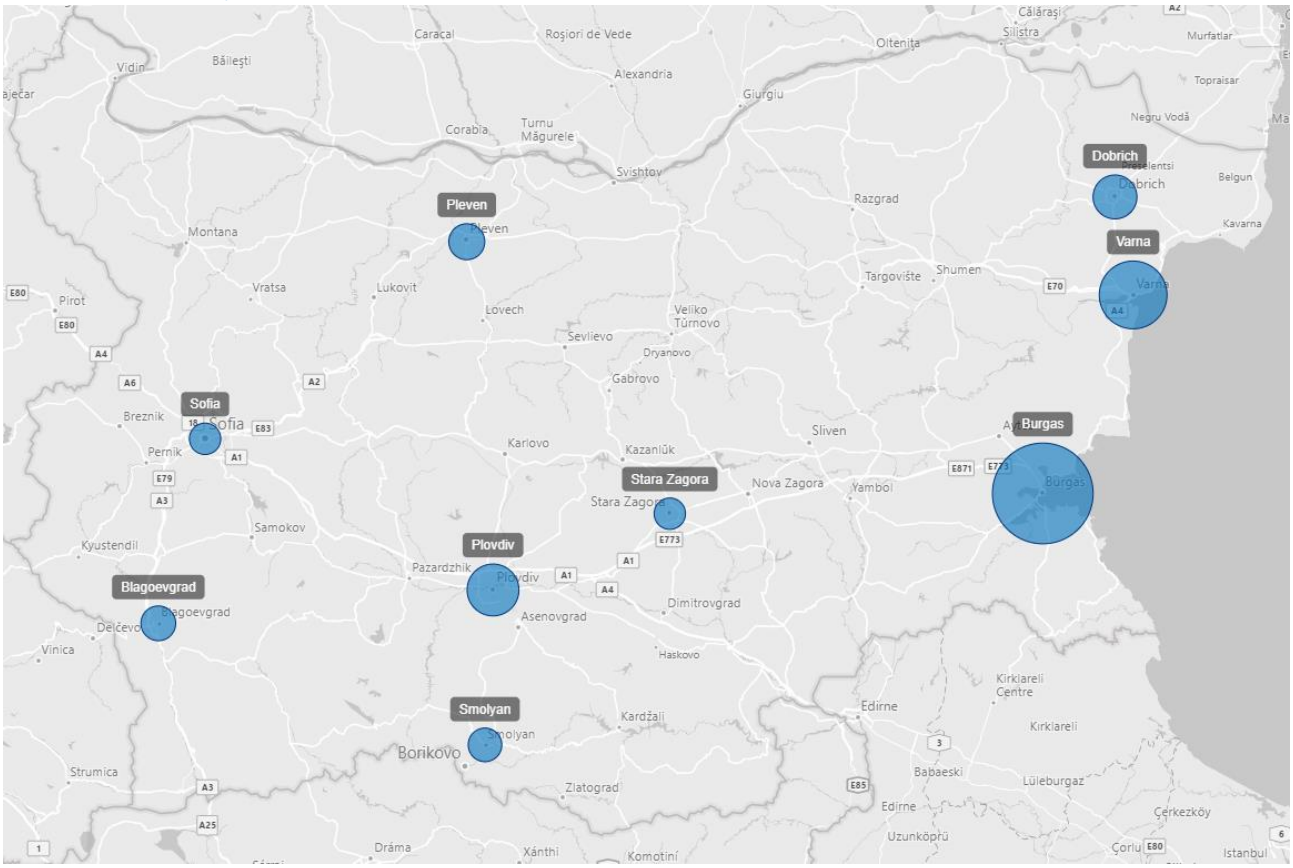


Figure 1 - Map of locations of refugees accommodated under state-sponsored accommodation.

Despite the overwhelming challenges, Bulgaria's people and government showed immense generosity and solidarity with refugees from Ukraine and mounted the largest recorded humanitarian response. Bulgaria was also among the first countries in Europe to grant Temporary Protection (TP) in early March 2022, registering more than 150,000 TP holders by year's end – although not all have remained in the country.

In parallel to the impact of the Ukraine situation on Bulgaria, last year marked the largest arrival of asylum-seekers at Bulgaria's southern border – some 20,407 lodged asylum applications in 2022 – since Bulgaria became a signatory to the 1951 Refugee Convention in 1992. The number of asylum applications, from Afghan and Syrian nationals, exceeded the peaks of 2015 and 2016 and were double the number from 2021.

The unprecedented arrival of refugees and asylum-seekers into Bulgaria received increased public interest as it coincided with ongoing political instability, serious incidents involving the smugglers, and a new veto on Bulgaria's bid to join the border-free Schengen Area.

The top three countries of origin of asylum seekers in 2022 were Syria (8,598), Afghanistan (7,164), and Morocco (1,721). This represents a change in the well-established pattern from previous years, when the applications from Afghan nationals were top, followed by Syrians and Iraqis – those three nationalities being on the highest cumulative number of asylum applicants in the 30 years of Bulgaria's

established asylum system. In 2022, other main countries of origin of asylum seekers were Ukraine (1,313) mostly before the introduction of Temporary Protection on 4 March 2022, followed by Iraq (656) and Russia (170).

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. SAR progressively reduced its accommodation capacity throughout the year, starting with 5,160 in January 2022 and ending the year with overall capacity of 3,782, a reduction of 27 per cent. Number of persons accommodated has fluctuated throughout the year, the lowest being 1,411 in June, the highest 2,800 in October, with a monthly average of 2,131. Because of changes in overall capacity, occupancy rate has changed significantly throughout the year, from 34 per cent in June to 71 per cent in October. In December, with overall capacity of 3,782, the occupancy rate was 64 per cent.

The **rate of terminated[2] refugee status determination procedures** is extremely high: 14,474 out of 19,292, which represents 75% of all outcomes. This is a significant increase from 46% in 2021 and 15% in 2020. Most of the individuals with terminated procedures in 2022 were from Afghanistan (9,895), followed by Syria (1,961) and Morocco (963). The **recognition rate** for Afghans continues to be lower as compared to other EU MS[3]49% in Bulgaria and 85% in the EU. However, terminations represent Similarly, low remained the total recognition rates for Moroccans (4% in Bulgaria, 8% in EU), and Pakistanis (6% in Bulgaria).

On the contrary, Syrian citizens kept enjoying a high recognition rate with 53 cases of rejected applications for international protection out of 5,730 outcomes. Most Syrians receive humanitarian statuses (3,651). Overall, the State Agency for Refugees issued 100 refugee status decisions (65 to Syrians, 10 to Afghans, 9 to Iraqis, etc.) and 4,273 humanitarian status decisions (3,651 to Syrians, 501 to Ukrainians, 36 to stateless persons). The **total recognition rate** increased to 91% from all determinations on the merits, compared to 62% in 2021.

The number of asylum applications of **unaccompanied and separated children** in 2022 increased from 3,172 in 2021 to 3,348 in 2022. This represents 16% of all asylum applications in Bulgaria for 2022. Most of these claims were submitted by applicants from Afghanistan (1,803) and Syria (1,383). As of 20 December 2022, out of all 3,348 unaccompanied minors who applied for asylum in 2022, 422 were accommodated in SAR reception facilities. The data presented points to a persisting elevated level of secondary migration among these children and the inherent risks of exploitation and trafficking they face along their further route.

I. In 2022, **no individuals have been resettled or relocated** to Bulgaria. On 5 October 2022, the Council of Ministers decided to resettle third country nationals or stateless persons displaced to a third country during the period 2023-2025, under Asylum Migration and

[2] The reasons for termination of a procedure are outlined in Art. 15 (1) of the Law on Asylum and Refugees (LAR).
[3] Source: https://ec.europa.eu/eurostat/web/migration-asylum/asylum/database

Integration Fund. It was further agreed that in 2023 Bulgaria will resettle 2023 refugees.

The AGD Approach

UNHCR's Age, Gender, and Diversity Policy, adopted in March 2018, is an overarching approach which aims to reinforce the longstanding commitment of the organisation to ensure that people are at the centre of its work[4]. The end goal of this policy is to guarantee that displaced and stateless people "can enjoy their rights on an equal footing and participate meaningfully in the decisions that affect their lives, families, and communities." 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 the protection of all refugees, regardless of their ethnic, social, or religious background. It also advances UNHCR's commitments to Accountability to Affected Populations (AAP) principles which place a high value on the meaningful dialogue with refugees, returnees, internally displaced, and stateless people. Both AGD and AAP policies aim to ensure that UNHCR's programme interventions and advocacy are shaped by what refugees tell the organisation about their needs, expectations, and aspirations. It requires UNHCR to identify and pursue concrete actions to enable working in partnership with and being accountable to displaced, stateless, and host communities.

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[5].

While maintaining the broader AGD approaches, in 2022 UNHCR Bulgaria also organized a participatory assessment exercise to include as many and as varied profiles of people as possible.

The data collection method used structured focus group interviews, following standardised questionnaires for asylum seekers, beneficiaries of international protection, temporary protection holders, unaccompanied minors, and younger children. All questionnaires were developed in 2018 and adapted to this year's operational context. A new questionnaire for TP holders was developed in 2022 to capture all aspects of their arrival, reception, and integration experience of temporary protection holders. 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 status[6].

In 2022, the focus groups were organised between 2 August and 11 October. Due to the anonymity of participation, the number of repeat participants cannot be definitively ascertained, but experience from previous years shows their number does not exceed five individuals. The interviews were

[4] UNHCR, UNHCR Policy on Age, Gender and Diversity, March 2018, https://www.unhcr.org/5aa13c0c7.pdf, p. 4
[5] UNHCR, The Global Compact on Refugees. UNHCR Quick Guide, p. 4-5, https://www.unhcr.org/5b6d574a7.
[6] 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 Ukrainian, Arabic, Farsi, and English), followed by the legal status of the persons of concern (asylum-seekers, beneficiaries of temporary or international protection).

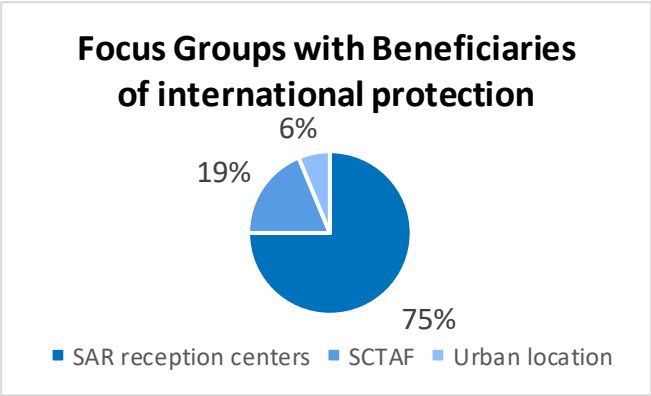
conducted by multifunctional teams, which in most cases included three people: interviewer, note-taker, and interpreter.

UNHCR organized a concluding workshop for the participatory assessment on 18 November 2022. Members of the multi-functional teams participated in the event and shared their observations on the data collected throughout the process, outlining areas of improvement, prioritising areas of concern, and suggesting recommendations for further actions. This report is based on the data collected in the participatory assessment process and reflects the final discussions which took place during the concluding meeting.

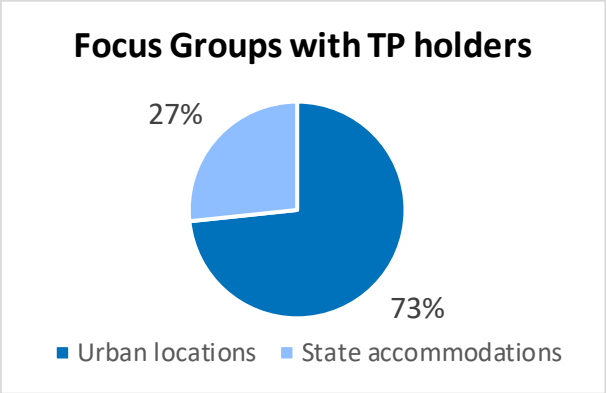
Like any research, the methodology of the AGD participatory assessment has its limitations. The main source of information are the asylum seekers, and beneficiaries of international and temporary protection holders, and their identified positive experiences, gaps and challenges, and recommendations, limited to the information available to them as part of their lived experience. The participatory assessment 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 assessment 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 assessment.

III. The 2022 Age, Gender, and Diversity Participatory Assessment

In 2022, the total number of focus group discussions conducted were 31, encompassing a record number of more than 300 people[7]. They involved multi-functional teams, consisting of 27 representatives of 11 state entities, non-governmental and academic organisations: the State Agency for Refugees, UNHCR, UNICEF, Bulgarian Red Cross, Bulgarian Council on Refugees and Migrants, Mission Wings Foundation, Caritas Sofia, Za Dobroto Foundation, Centre Nadya Foundation, Sofia University "St. Kliment Ohridski" (Faculty of Pedagogy), Bulgarian Academy of Science (Institute for Philosophy and Sociology and Institute of Ethnology and Folklore Studies with Ethnographic Museum), Confederation of Independent Trade Unions in Bulgaria. The average number of respondents per focus group was 11.



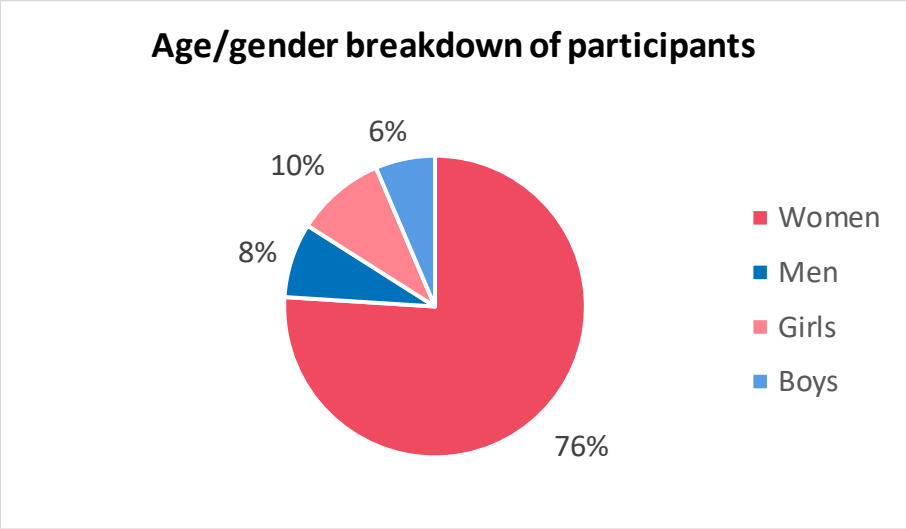
[7] The precise number of responders cannot be provided as one of the focus group discussions had a very large turnout of participants and turned into an open discussion, without the collection of necessary bio and other data.



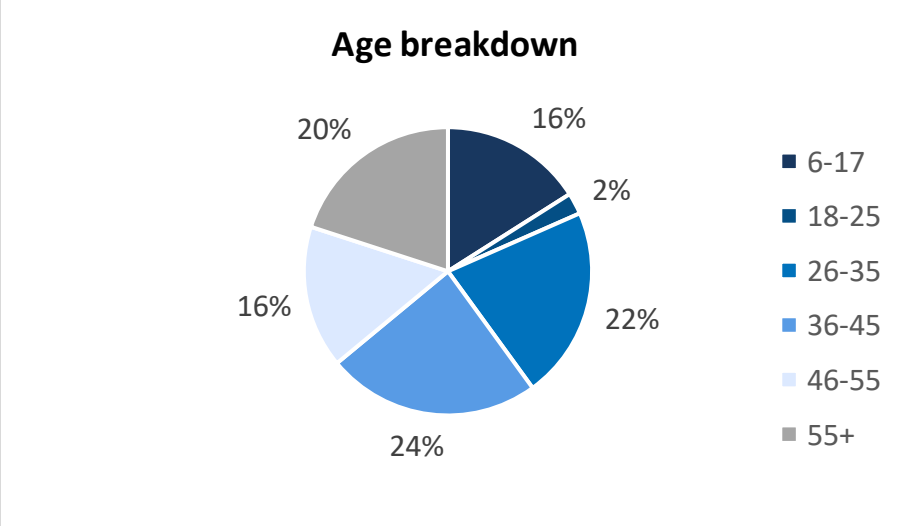
IV. Key Findings: Temporary Protection

1. Profile of the Participants

The gender profile of the 125 participants with temporary protection to a large extend mirrors the overall composition of the population of people fleeing the war in Ukraine registered in Bulgaria: predominantly women with children (see below graph).



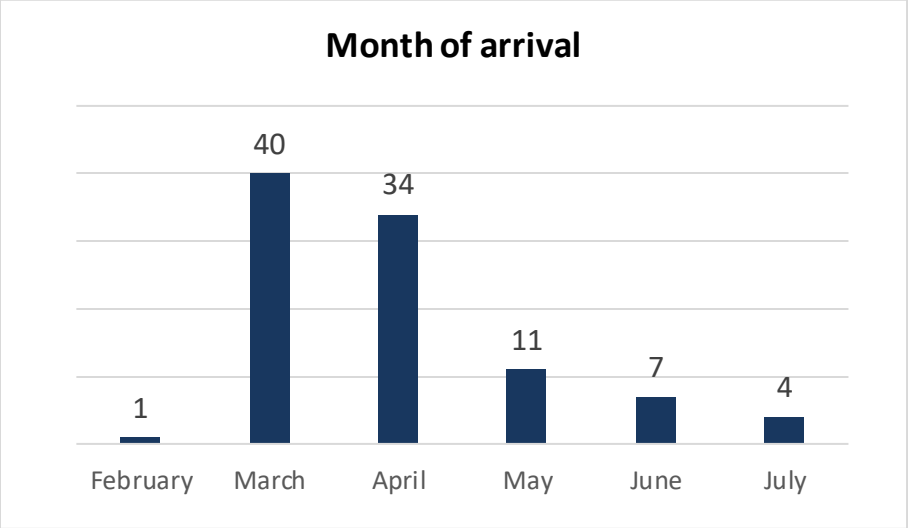
Some 105 adults and 20 children were interviewed. The age profile of the respondents is presented in the following graph:



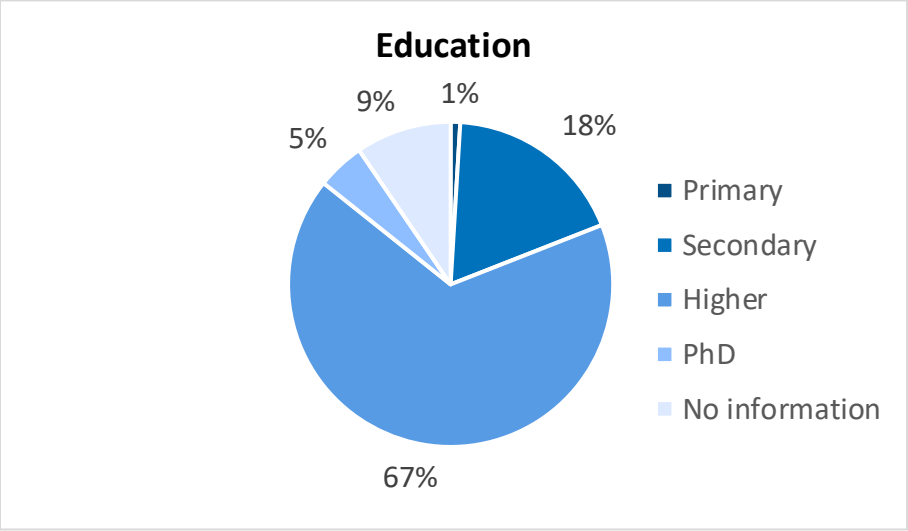
Most of the respondents were residents of the eastern and southern provinces of Ukraine, which were worst affected by the armed conflict. Most individuals pointed Odessa as their hometown, which may be explained with its geographical and cultural proximity to Bulgaria. Only one respondent originates from a western region, namely Rovno.

Home Region in Ukraine	Number of Respondents
Odessa	18
Dnepropetrovsk	15
Mykolaiv	14
Kyiv	14
Kharkov	12
Kherson	12
Zaporizhzhia	9
Donetsk	4
Lugansk	2
Rovno	1
Sumi	1
No information	23

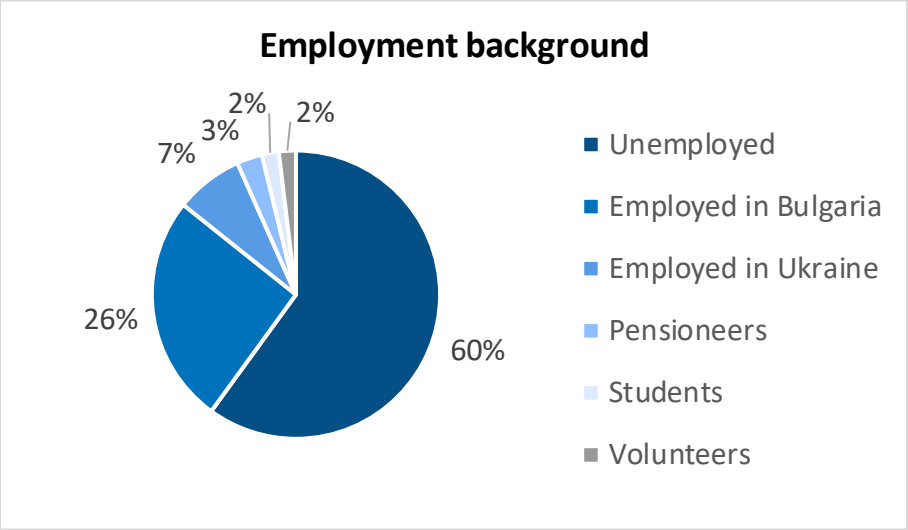
Most of the interviewed individuals arrived in Bulgaria in the first weeks of the war, in the months of March and April (see graph below).



The reported level of education of adult respondents is high, with more than two thirds of the participants having university certificates. Most university graduates have degrees in economics (19), pedagogy (12), law (12), psychology (7), engineering (7), medicine (7), philology (6), accounting (3), and tech (3). Some 25 per cent (18) of those having higher education reported a second university specialty: mostly in psychology and social sciences. Almost all interviewed respondents have their educational certificates, but less than half of them have the original copies of those documents in Bulgaria.



The employment background of the temporary protection holders is diverse. The main professions reported are teachers (11), accountants (9), doctors, pharmacists, and dentists (8), lawyers (7), university professors (4), psychologists (4), engineers (3), hairdressers and cosmeticians (2). This employment profile represents a challenge for the inclusion of respondents in the Bulgarian labour market, as some of the above-mentioned professions are either regulated (such as teachers, lawyers, doctors, engineers) and thus require the completion of complicated recognition procedures, while others are highly contextualized and dependent on local legislation (accountants).



Out of 105 interviewed adults, 63 (or about 60 per cent) remain unemployed. The number of those legally engaged in the labour market in Bulgaria is 27. Yet, there is a difference in the percentage of those employed depending on their type of accommodation: the unemployment rate of persons living at private addresses stands at 49 per cent, while the one of those accommodated in hotels and state-owned facilities – at 76 per cent. Only one person has reported to successful run its own business, a food delivery company.

Those already active in the labour market predominantly work in low-skilled jobs which do not match their educational background or professional experience in Ukraine. Most respondents claim to work in hotels and restaurants (5), in childcare services offered by the civil society organizations (5), and retail (3). Few are those who have continued their professions since fleeing from the war in Ukraine. Two people reported such continuation – one as a geodesist and one as a professional photographer.

The challenges which explain the reported employment status in Bulgaria include lack of employment opportunities at resorts and remote areas or limited to three months during the tourist season; lack of employment opportunities commensurate with the refugees' qualifications and experience; language barrier; complex and lengthy procedures to practice regulated professions; lack of childcare facilities; low wages insufficient to cover rent, utilities, and basic needs. The termination of support under the government's humanitarian assistance program after one month upon TP holders starting to work was also cited as a factor which adversely affects employment prospects.

2. Factors for Choosing Bulgaria as a Destination

Regarding the factors that led to those interviewed to choose Bulgaria as the place to seek safety, participants outlined its **proximity to Ukraine** – both geographically but also linguistically and culturally. Other factors included having **pre-existing connections** to Bulgaria – relatives and friends living in the country and previous visits for tourism or work. The **state's favourable policy towards Ukrainian refugees** such as the introduction of organized transportation and evacuation and the establishment of a humanitarian support programme with accommodation and food was also cited as a reason. Other motives included entire **companies having relocated to Bulgaria** and the perception

of **the cost of living** in the country being **lower** than in Western Europe. **Personal circumstances** such as being part of a sports team and receiving an **invitation by a sports federation** member in Bulgaria were also cited.

3. Main challenges

3.1. Accommodation

Some 46 of the participants were renting privately, while 42 were accommodated at a hotel or state-owned facility under the government's humanitarian support programme. Some 10 people were staying with friends or volunteers or had been provided with accommodation by their employer and were not charged rental costs, while one person was accommodated at a residential social service.

The main challenges to renting privately included the **perceived reluctance of landlords to rent apartments to Ukrainian refugees**, as well as the **imposition of additional financial requirements** such as requiring two deposits, instead of the customary one, or higher rent than the market average. Additional hurdles were posed by the demand to have the contract signed by a Bulgarian citizen as well as the **rents being high in coastal areas**, where most Ukrainian refugees reside, particularly during the tourist season.

"As soon as they hear that we are Ukrainians, they immediately hang up the phone. If we get to visit a flat, we want to rent, they say, "We will think about it" and give it to Bulgarians or offer us an exorbitant rent."

Female, 29, Blue Dot Sofia

Participants also outlined some good practices regarding access to housing such as having the first month or first several months' rent waived or covered by NGOs and having to pay only for utilities. Overall, refugees found flats through social networks, NGOs, acquaintances, employers, and real estate agents.

Concerning **accommodation under the state humanitarian assistance programme** – and more broadly the overall reception conditions provided to temporary protection status holders under it – overall, respondents had lower levels of information about their rights and obligations and exhibited a higher degree of anxiety from the unknown future. Among the children of those interviewed who were accommodated under the programme (more than 42), none attended Bulgarian school, while among adults only 19 per cent were employed, compared to 49 per cent among those not benefiting from the program. Challenges identified included lack of stable internet connection including for online learning; additional charges by the accommodation facility imposed for using air-conditioning, internet, or parking; lack of variety in the food provided; prohibitive cost of transport to nearby bigger cities to access services - often no or few public buses available - as well as lack of hygiene materials. Factors that adversely impacted integration prospects of those accommodated of the hotels and

government bases, often located in resort towns or remote areas included the lack of employment opportunities as well as the large distance from kindergartens and schools, from medical care or available support services such as those provided at Blue Dot support hubs or through NGOs.

Concerning **community self-organization structures**, differences were observed between the different locations: while those accommodated at one hotel had a schedule with activities organized according to the skills of the accommodated refugees (e.g. psychological support; art therapy); access to Bulgarian language classes through an NGO; established a support group for children studying online as well as a regular schedule to ensure the cleaning of common premises, those accommodated in a government base lacked any activities for children or language classes and reported a feeling of detachment and lack of prospects.

3.2. Education

Out of the 20 interviewed children, nine were enrolled at Bulgarian school or kindergarten, 11 attended online education in Ukraine, while one child attended both a Bulgarian school and Ukrainian online education. It should be noted that among the children of those interviewed accommodated under the **Government's humanitarian programme** (more than 42 people), only one child attended kindergarten in Bulgaria while **none** was enrolled at **Bulgarian school**.

The factors cited as impeding enrolment at Bulgarian schools included unclear enrolment procedure; complaints about the attitude of employees of the Regional Administration of Education in Varna as well as delays in the decisions for enrolment issued by them; lack of available places for children at schools and kindergartens; and referrals to remote kindergartens and schools to which there was no public or organized transport. Caregivers also shared concerns about proper grade assessment and placement, especially for high school education, where the child did not have documents certifying completion of a previous grade. Additional obstacles were fears concerning mandatory vaccinations, not knowing Bulgarian language, and concerns about re-enrolment in Ukrainian schools upon return following the completion of a grade in Bulgarian schools. The main impediment cited to access higher education were high tuition fees for foreign nationals.

Overall, children enrolled at Bulgarian schools stated that they were well received by teachers and classmates and did not report cases of abuse. Only two children reported receiving additional hours of Bulgarian language training at school, as envisaged in the legislation. All children reported attending many extracurricular activities and while currently claiming to understand about half of what was being taught due to the language barrier, they expected to catch up quickly. The main differences reported by the children compared to their school experience in Ukraine concerned requirements and homework, as well as discipline: in both cases those in Ukraine were reported to be stricter.

3.3. Information

The interviewees reported lack of information about their rights and obligations in Bulgaria, including at the border, where in addition they did not receive information about places of accommodation, onward travel etc. While most refugees expressed the need to receive centralized information provided by an official source, very few were aware of the existence of the government's information

portal where such information is available in various languages. The lack of information in accessible language, with clear steps to be followed, was identified as a barrier to accessing services. In addition, refugees also expressed the need to receive information not only about rights and obligations but also about everyday life in Bulgaria, particularly at local level (e.g., parking regime, payment of utility fees).

"We had no starting point, we didn't know where to go. "

Female, 60, Blue Dot, Varna

3.4. Healthcare

A small percentage of the respondents were registered with a general practitioner (GP) which is the main requirement for accessing the healthcare system as part of the state-provided national health insurance scheme. The reasons identified for such lack of registration included lack of information about the health system; as well as inability to pay health insurance. Except for children and women above 63 and men above 65 years old, all TP holders have their health insurance paid by the state for the first three months after being granted TP; upon the expiry of this period, they must cover the payments themselves. Respondents were also unable to find a GP willing to register them as patients, especially in resort towns where there are very few GPs and due to the language barrier.

Other obstacles identified impeding effective access to healthcare included lack of medical assistance in resort towns and lack of funds to purchase medicines, as the vast majority are not reimbursed through the national health insurance scheme. People with disabilities raised over the slow and complex procedures for disability certification (a requirement under Bulgarian law to access assistance) and lack of medical appliances for persons with disabilities (e.g., wheelchairs, crutches) despite TP holders having access to them according to legislation.

Those with medical qualifications expressed regret over not being able to practice their profession due to the long and complex procedure of recognition of medical degrees.

"I try not to get sick. I will go to the doctor when I get back to Ukraine."

Female, 61, Integration Center of Za Dobroto NGO

4. Refugees' experience in Bulgaria

A small percentage (8 per cent) report their firm intention to remain in Bulgaria; some 31 per cent planning to return to Ukraine soon, while 61 per cent remain undecided.

"Every day I dream of going back. I am a strong woman, ready to build my city from the ruins. But how do I get my kids back in there? Life is too short to do this to them."

Female, 49, Integration Center of the Bulgarian Red Cross (BRC)

Almost all respondents stated they felt well received in Bulgaria and expressed their gratitude to the country and to the people who helped them, providing numerous examples.

We met so much kindness in Bulgaria that I still can't believe it. My life was saved several times by ordinary people."

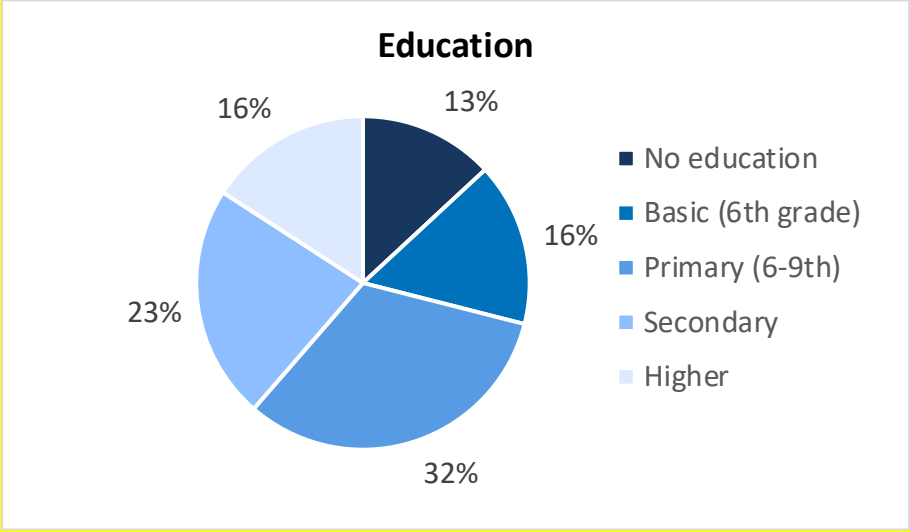
Female, 55, Integration Center of BRC

Of the few cases reported where the interviewees reported having faced discrimination and rude treatment, the incidents related primarily to doctors and landlords. Overall, more negative attitude was reported in the Black Sea region compared to Sofia and Stara Zagora.

The difference in attitude here and in Varna is huge. The local people there are quite unfriendly. At first, they were nice, but after the start of the season, the prices went up and they only wanted real tourists, not refugees."

Female, 31, Starozagorski Mineralni Bani

V. Key Findings: International Protection



The largest percentage of interviewees (32 per cent) have declared to have primary education (which in Syria and Afghanistan means sixth-ninth grade), followed by those who claim to have graduated from secondary education (23 per cent). About 16 per cent have studied up to six years, while less than 10 per cent of the respondents have declared to have not attended school (13 per cent), or to have higher education (16 per cent).

Only 27 interviewees share that they have original diplomas from various stages of their educational path, with only one had those documents with them in Bulgaria.

The qualifications of those who have university diplomas were business administration (2), pedagogy (2), philology (2), law (2), chemistry, media, international relations, interior design, graphic design, and others.

Information regarding the employment status is provided for those participants who had the right to work, including asylum seekers three months after the submission of the asylum application[8] as well as those granted international protection, i.e., 62 adults, with detailed data available for 47 of them. Some three have stated that they are employed at the time of the focus group, with only one of them had an official labour contract. None of those employed were women. Another two persons declared they were searching for employment.

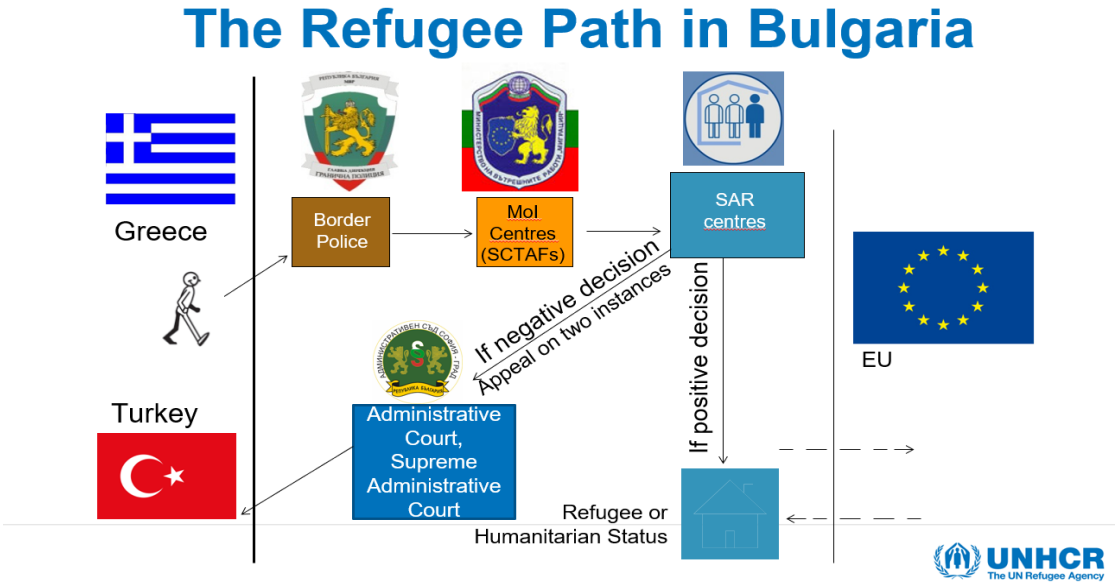
One interviewee stated he is an entrepreneur while the rest were employed as general workers, and one as car mechanic.

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

5. Key Findings of the 2022 AGD PA

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

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:



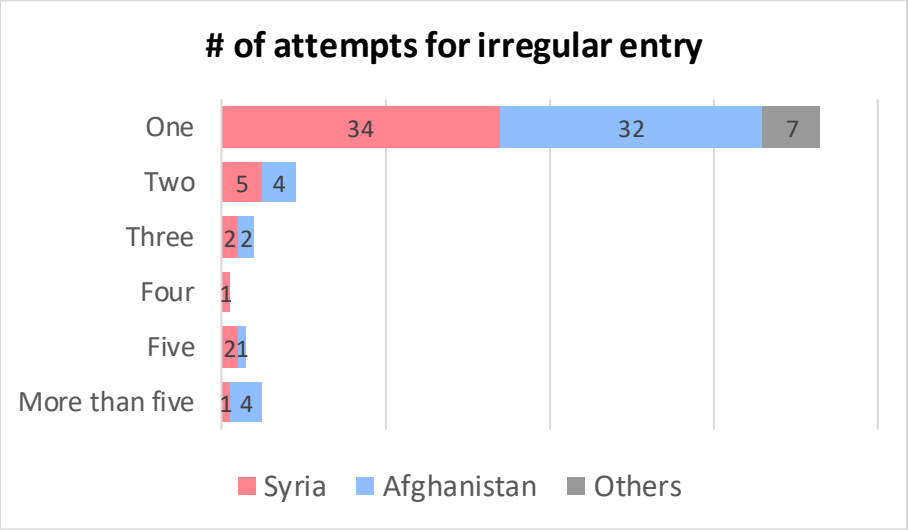
5.1. ACCESS TO TERRITORY AND TO REFUGEE STATUS DETERMINATION (RSD)

Respondents in the 2022 AGD participatory assessment continued to report challenges in accessing Bulgarian territory.

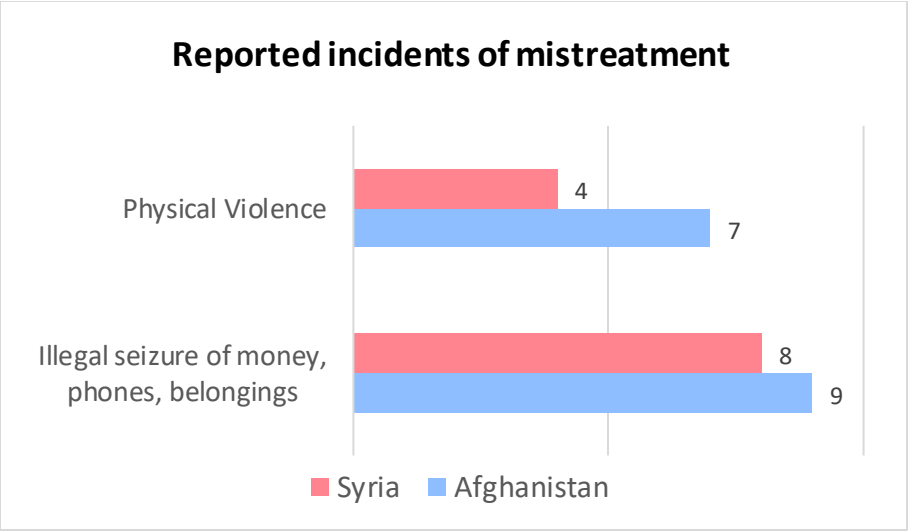
More than a fifth – 28 persons out of all 125 responders[9] - reported having entered legally, either on visa, using family reunification procedures or under relocation schemes of the EU, and two persons were returned to Bulgaria from another EU Member State. All others reported to have entered in an irregular manner, the majority of whom through Turkiye.

Out of 95 people who answered the question about their irregular entry, 73 reported crossing into Bulgaria on their first attempt. The others report two, three or more attempts, with five individuals having more than five attempts. The following graph shows the number of entry attempts by nationality:

[9] Those are the number of people who have replied to the question: "When and on which attempt did you enter Bulgaria"



There does not appear a significant difference among the number of attempts to enter Bulgaria between Syrians and Afghans. Some 22 people from 93 reported experiencing ill treatment upon irregularly entering Bulgarian territory.



The most prevalent reports were the confiscation of money, phones, and personal belongings (17 reports); and physical abuse/violence (11 reports). Two cases of ill-treatment were reported by unaccompanied children. One reported incident took place on Turkish territory.

More than 20 responders of those interviewed who reported to have arrived irregularly were 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 the Ministry of Interior. In addition to unaccompanied children, 12 of whom also confirmed that interpretation was provided during the initial 24 hours police detention, interviewees at RRC Ovcha

Kupel confirmed to have been registered after approaching the RRC in person, without having been placed at SCTAF first.

5.2. CONDITIONS IN THE SCTAFs

The feedback on the conditions in the two SCTAFs in Busmantsi and in Lyubimets were regarding deterioration due to the increase in the number of persons placed there.

As a positive development, the average reported detention period of the interviewed individuals decreased to is 16 days compared to 22 in 2021. This is also due to the obligatory period of quarantine as part of COVID-19 measures no longer being applied. PCR test continued to be carried out at the entry and exit of this quarantine period.

The practice of placing unaccompanied children in detention has diminished with 12 out of 33 of those interviewed, having been placed in either Busmantsi or Lyubimets (40 out of 59 in 2021). It nevertheless continues to happen through their assignment to an unrelated adult, or their registration as adults.

The issues identified by the responders are outlined here along the number of complaints registered by the Multi-Functional Teams:

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

Accommodated individuals, apart from those in the family section of the SCTAF, have no access to the hygiene facilities during the night, 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.

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

Although in both centres there is a physician, numerous complaints were registered about the limited access to medical aid in the absence of a system to request such an examination. Further, there is no interpretation during the visit to the doctor, and often no or only basis medications are provided, regardless of the nature of the complaint.

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

The lack of information and interpretation services in both SCTAFs was brought up by a large part of the respondents who stated that they face serious obstacles to communicate with the police officers.

The lack of interpretation in detention facilities resulted in a lack of information and general understanding of the asylum procedure in Bulgaria, and the inability to access services, such as legal aid, medical or psychosocial support. To address the issue of lack of information UNHCR developed information videos in nine languages and donated screens on which they could be played but the respondents had not watched them.

- *Substandard detention conditions*

Other persisting issues identified during the focus groups are related to the overcrowded rooms, often extremely hot during the summer; lack of sufficient beds and mattresses (new arrivals having to sleep on blankets); or bed-bugs infected mattresses; insufficient quantity and inferior quality of the food; irregular distribution or lack of hygiene packages including toilet paper and soap.

- *Lack of recreational activities and barriers to communicating with family members*

Several responders raised concerns about the lack of any recreational activities at the centres and the limited time they are allocated outside (one hour in the morning and one hour in the afternoon). The inability to communicate with their families due to having to pay other individuals accommodated at the centre to use their mobile phones (only mobile phones without cameras are allowed at SCTAF and not all detained are in possession of such phones) was also identified as a problem.

"For 20 days we didn't have a chance to let our families know we were alive and well."

Male, 27, Humanitarian Status holder, RRC Harmanli - for SCTAF Busmantsi

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The 2022 AGD participatory assessment marked an improvement regarding violence and ill treatment in the SCTAFs reported by responders. Some eight individuals claimed to have been either a victim (two individuals) or a witness (six individuals) of physical violence by police officers (compared to 22 in 2021). It is reported that such ill treatment usually takes place in spaces not covered by CCTVs.

5.3. REFUGEE STATUS DETERMINATION PROCEDURE

The 2022 AGD participatory assessment did not identify serious negative developments regarding the quality of the refugee status determination procedure (RSD). The positive trend of all RSD interviews being audio recorded has been preserved with no reported cases of such omissions.

While in most cases, the protocols of the interviews have been read out and translated to the asylum-seekers before being signed, cases were reported where this was not the case in all RRCs, with RRC Vrazhdebna being the only exception.

While almost all respondents agreed that they had sufficient opportunity to present their refugee story concerns were raised about the quality of the interpretation at the asylum interview, notably at RRC Harmanli.

Moreover, those interviewed raised concerns regarding delays in the issuance of decisions on their asylum claims beyond the statutory deadline of six months (the deadline could be prolonged, but the asylum seeker must be informed about the delay). Those accommodated at RRC Harmanli complained about discrepancies in the periods for obtaining decisions (asylum seekers who submitted their applications at the same time received decisions within different periods), raising concerns about irregularities.

5.4. RECEPTION CONDITIONS AT SAR RRCs

The 2022 AGD participatory assessment continued to register opposing tendencies regarding the reception conditions in the SAR centres in Sofia (in particular RRC Vrazhdebna) and the ones outside (in particular RRC Harmanli).

Accommodated individuals in the three reception centres in Sofia assess the conditions as satisfactory except for Voenna Rampa where concerns were raised regarding the lack of hot water, sanitary condition of the bathrooms and infestation of cockroaches and bedbugs. Those accommodated in Ovcha Kupel complained about the lack of access to the laundry room and having only one functioning kitchen. Women accommodated there also expressed their willingness to support staff if stricter cleaning regime of the kitchen premises and shared areas is imposed.

As in previous years, asylum-seekers at RRC Vrazhdebna expressed high level of satisfaction with the conditions at the centre including hygiene, and the condition of the rooms while appreciating the possibility to cook. They were familiar with the employees there whom they found approachable, felt informed about their rights and obligations as well as the asylum procedure and were aware who to turn to in case they need assistance.

While asylum-seekers accommodated at Pastrogor expressed overall satisfaction with the material conditions at the centre, they raised concerns regarding the lack of information and impossibility to communicate with employees due to lack of interpreters outside the asylum procedure. The remote location of the centre (1.5 hours on foot to the nearest town and no public transport), and the lack of activities, including language classes and sports, were also cited as concerns, alongside the lack of refrigerators and cooking facilities.

Those accommodated at RRC Banya also raised concerns about the lack of activities, including sports and language classes, and the possibility of finding legal employment. Female asylum seekers reported security concerns due to the toilets not having locks. The enrollment of three children at school, which they attend regularly, was cited as a good practice, alongside the medical specialist at the RRC speaking Arabic.

As in the previous year, the levels of satisfaction were much lower in RRC Harmanli. One of the most common concerns raised was the lack of proper information and staff members to turn to obtain it or address complaints. A sense of high tension between the staff and accommodated refugees was observed, with mutual accusations of neglectful and rude treatment. Medical services on-site were reported to be insufficient, with a doctor being present only once a week for a limited time. The absence of interpretation outside the asylum procedure, as reported in other centres, further hindered access to medical and social support. Interviewees also raised concerns regarding the lack of cooking facilities and place to wash the dishes. In the absence of air-conditioning, the rooms were reported to be excessively hot in the summer. Female asylum-seekers and refugees accommodated at the centre stated they were not feeling safe due to not being able to lock their rooms. Allegations of irregular payments through the interpreters were also raised.

"The doctor is coming to the camp on Tuesday for 2 hours. So, if you want to get sick, you have to get sick on Tuesday."

Female, 42, Syria

"The attitude towards us is like towards passers-by. No information, no work, nothing happening"

Male, 27, Syria

Regarding the conditions at SAR's only closed centre, located on the premises of SCTAF Busmantsi but managed by SAR, lack of information remains of concern, with those interviewed stating they do not have a clear understanding of the reasons for their placement at the centre as well as its length, which does not have a maximum time-limit under the Law on Asylum and Refugees (LAR) but should be imposed for the shortest possible period.

5.4. UNACCOMPANIED CHILDREN

Some 33 unaccompanied children were interviewed within the participatory assessment within three focus groups in RRC Harmanli and RRC Sofia (the safe zones of Ovcha Kupel and Voenna Rampa). Substantial improvement was noted regarding early identification and subsequent referral to the asylum procedure (if applying for international protection) or child protection services.

As mentioned above, 12 out of 33 (compared to 40 out of 59 children in 2021) unaccompanied children have been detained in the SCTAF despite the explicit prohibition of such arrangement under the Law on Foreigners (Art. 44 (9)). Moreover, 12 children also confirmed that interpretation was provided during the initial 24 hours police detention which facilitated their identification and referral. Initial identification has also improved due to the increase in the number of residential care facilities willing to accept unaccompanied children, as well as SAR designating officers on duty outside working hours and on weekends.

Compared to previous years, a larger proportion of interviewed unaccompanied minors (UAMs) demonstrated understanding of the role of their legal representative from the National Bureau for Legal Aid. Only three children reported not having met with their representative. All children at the safe zones RRC Voenna Rampa and part of those in Ovcha Kupel knew the name of their representative and had their phone number and knew how to reach them, some reporting being in regular contact with them (in comparison to one child in 2021).

Children accommodated at the safe zones in Voenna Rampa and Ovcha Kupel demonstrated a good understanding of their rights and obligations during the asylum procedure but highlighted the need to have access to regular information about the status of their asylum application. However, challenges remain in RRC Harmanli, where currently there is no safe zone, regarding both the level of information as well as communication and interaction with representatives from the National Bureau for Legal Aid.

Further, most unaccompanied children continue to remain out of the educational system. A handful of those interviewed have been enrolled to Bulgarian schools and none of them has actively participated in classes, mainly due to lack of Bulgarian language knowledge. Some seven children, who had arrived recently, expressed their willingness to be enrolled at school.

Without any introductory training in Bulgarian, children easily lose interest and motivation to take part in classes. At the same time, the children stated that they would like to be obliged to go to school as currently they perceive it only as an option, without anyone enforcing it as an obligation including for those below 16. They further added that they would like to have a routine and be obliged to attend activities.

Regarding reception conditions, overall UAMs expressed satisfaction with both safe zones in Sofia, also underlining the good communication and responsiveness of staff there. However, children at RRC Harmanli stated that they were not aware of who could be approached for assistance and help.

Concerns were raised in all centres about the lack of clothes, the quality and quantity of food and the lack of regular distribution of hygiene materials. While some activities of NGOs aimed at children take place at RRCs, children were not aware of them or could not take part. The general lack of recreational activities and sports equipment was often cited as problematic.

In contrast to previous years, a considerable proportion of the children stated that they would remain in Bulgaria until they are granted international protection and are reunited with their family members rather than leave the country during the procedure or upon being granted a positive decision.

Progress was registered regarding accommodation in residential care social services following the granting of international protection with residential care facilities throughout the country. It is expected that the guidelines adopted by SAR in October 2022 regarding the placement of such children in residential services would further improve the process.

5.6. 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 *2017 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 (Asylum Migration and Integration Fund) 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, most refugees leave Bulgaria.

While the Participatory Assessment included beneficiaries of international protection, many of them had arrived recently thereby limiting the amount of information that could be collected concerning integration challenges.

Compared to previous years, a significant number of those interviewed did not declare their intention to leave the country immediately upon being granted status but stated that they were going to apply first for family reunification and then move onwards to other countries in Western Europe. Nevertheless, overall, the vast majority still declared intention to leave Bulgaria and demonstrated little interest in participating in social and cultural orientation sessions and exploring opportunities to remain.

Overall, of those who firmly declare their intention to leave the country stated as reasons:

- Family members, relatives, and friends in other European countries;
- Large community of their compatriots in other European countries;
- Inability to find suitable housing after the end of the international protection procedure and inability to cover basic living expenses;
- Poor economic conditions in the country;
- The lack of integration support and financial resources in the first months after leaving the SAR centres.

The decision to leave the country is not related to any negative or discriminatory treatment; all respondents stated that they perceive Bulgaria as a welcoming country and didn't experience discrimination.

The beneficiaries of international protection still residing in SAR reception centres unanimously point to the address registration and finding actual suitable place to live as their biggest problem and concern. 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 450-500 euros.

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 2022 AGD participatory assessment 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 2023 Methodology

- Adapt the questionnaires, to include fewer groups of questions, but more targeted questions on thematic areas which provide the necessary level of details (UNHCR);
- Expand the number of agencies attending focus groups, including all UN agencies and involve refugees who are integrated in Bulgaria, private sector, and non-traditional partners;
- Improve the inclusion of state institutions in the focus groups with refugees, while
- simultaneously guaranteeing responders' freedom of expression (UNHCR);
- Provide feedback to asylum-seekers and refugees participating in the AGD participatory assessment (UNHCR);
- Ensure participatory assessments are conducted regularly throughout the year (UNHCR).

5.2. Access to Territory and procedure for granting international protection

- Ensure the establishment of a protection-sensitive entry system enabling the identification, access to territory, and swift referral of those who wish to seek international protection (Chief Directorate Border Police and Ministry of Interior);
- 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 have experienced ill-treatment to file official complaints (Chief Directorate Border Police, UNHCR, NGOs);
- Improve access to interpretation following initial apprehension upon irregular entry or stay, including in the 24 hours police detention premises (Chief Directorate Border Police; Chief Directorate National Police);
- Expand legal pathways to Bulgaria, including through resettlement (Council of Ministers);
- Ensure unaccompanied children are correctly identified and referred to the appropriate authorities and are not placed at SCTAF (Chief Directorate Border Police, Chief Directorate National Police, Agency for Social Assistance);
- Strengthen the capacity of Border and national police to identify and refer persons in need of international protection (UNHCR).

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, Ministry of Interior 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);
- Improve the complaint mechanisms and encourage individuals to submit complaints, including in the boxes placed in both centres (Directorate Migration);
- Ensure access to means of communication with the outside world, in particular family members and relatives
- Ensure psychological counselling is available and accessible, including providing interpretation
- Create recreational activities for accommodated individuals (Directorate Migration, NGOs).

5.4. Refugee Status Determination Procedure

- 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 assistance at all stages of the asylum procedure (SAR, National Bureau for Legal Aid).

- 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 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);
- Ensure the provision of Bulgarian language classes at RRCs and issue certificates upon completion of the course (SAR).

- Conduct GBV safety audits at all RRCs, improve risk mitigation and response measures including the consistent implementation of the Standard Operating Procedures on GBV, and organize regular awareness-raising sessions among the community. 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 enrolment and attendance through intensive Bulgarian learning and individual educational support as well as awareness-raising among parents and children (SAR, MES, IOM, NGOs);
- Consider establishing a safe zone at RRC Harmanli and do not place unaccompanied minors in RRC where no such zones exist unless it is assessed to be in their best interest (SAR);
- Continue facilitating the placement of unaccompanied children within the national child protection system, including residential care services and foster families (SAR, Agency for Social Assistance, residential care service providers).
- Improve the capacity of representatives from the National Bureau for Legal Aid to discharge their responsibilities and ensure they are accessible and able to communicate with the children, including by providing interpretation.

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, Council of Ministers, Parliament);
- Inform the respective Directorates of Social Assistance about the granting of international protection to vulnerable persons to facilitate access to assessment and support;
- Terminate 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 (Ministry of Interior);
- 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).

5.8. Temporary protection

A. Accommodation:

- Ensure support under the Humanitarian assistance programme is not terminated one month upon the conclusion of an employment contract or provide for a longer intermediate period;
- Consider providing the possibility for TP holders to choose whether to use accommodation within the Humanitarian assistance program or to receive financial assistance for rent;
- Ensure accommodation and other support is provided in line with the individual needs and circumstances, following vulnerability assessment.

B. Education:

- Ensure the availability of sufficient number of Bulgarian language courses;
- Consider establishing more childcare centres and providing alternative childcare opportunities;
- Consider strengthening the administrative capacity of Regional Education authorities.

C. Employment

- Consider establishing a faster procedure for the recognition of qualifications of teachers from Ukraine;
- Consider optimizing the procedure for recognition of degrees of doctors and nurses, and explore alternative ways of including them into the healthcare system while the procedure is ongoing;
- Conduct assessment and improve the effectiveness of Solidarity program to ensure it addresses the needs of employers and refugees;
- Consider organizing accelerated vocational courses;
- Consider introducing free transport to the regional centre cities from resorts for those accommodated under the humanitarian program.

D. Healthcare

- Maintain an up-to-date list of GPs willing to register refugees as patients
- Consider raising the limit of patients beyond which it is required to hire a second doctor from 2,500 to 3,000 or offer additional financial support to GPs willing to register refugees;
- Consider recognizing the validity of disability certificates issued in Ukraine until the person undergoes assessment in Bulgaria.

E. Information:

- Regularly update the information provided on the national government's portal and promote its use as well as maintain the helpline;
- Ensure information is provided at the border;
- Systematize and provide information about the services the local level.

The UNHCR Representation in Bulgaria would like to express its gratitude to all asylum-seekers and beneficiaries of temporary and international protection for their participation in the 2022 AGD Participatory Assessment, as well as to the experts from various state institutions – SAR in particular – as well as NGOs and volunteers who supported and contributed to its implementation.
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