

# Country Strategy Evaluation

## **BULGARIA 2022-2024**



## UNHCR Evaluation Office

The Evaluation Policy of the United Nations High Commissioner for Refugees (UNHCR) reflects the organisation's commitment to support accountability, learning and continuous improvement through the systematic review and analysis of the organisation's strategies, policies and programmes. Evaluations are guided by the principles of independence, impartiality, credibility and utility, and are undertaken to improve the organisation's performance in meeting the protection, assistance and solutions needs of refugees, stateless persons and other forcibly displaced persons.

### **Evaluation Office**

United Nations High Commissioner for Refugees  
Case Postale 2500  
1211 Geneva 2  
Switzerland

[unhcr.org/about-unhcr/evaluation](https://www.unhcr.org/about-unhcr/evaluation)

Published by UNHCR

Evaluation Office Copyright © 2025 UNHCR

This document has been published by the Office of the United Nations High Commissioner for Refugees for general distribution. All rights reserved. Reproduction is authorised, except for commercial purposes, provided that UNHCR is acknowledged.

Unless expressly stated otherwise, the findings, interpretations and conclusions expressed in this evaluation report are those of the evaluation team and do not necessarily represent the views of UNHCR, the United Nations or its Member States. The boundaries, geographical names and related data shown on maps and included in lists, tables and documents in this evaluation report are not guaranteed to be free from error and do not necessarily imply the expression of any opinion whatsoever on the part of UNHCR or the United Nations concerning the legal status of any country, territory, city or area or of its authorities, or concerning the delimitation of its frontiers or boundaries.

# ACKNOWLEDGEMENTS

The evaluation team would like to thank the UNHCR Country Office (CO) in Bulgaria, as well as all forcibly displaced persons, national institutions, funded partners, and other key stakeholders for their availability and valuable contributions to the evaluation process. We are particularly grateful to Seda Kuzucu (Representative), Bulent Peker (Senior Protection Officer), Nicolás Rodríguez Serna (Operations Officer), Gokalp Arslan (Associate Officer), Aleksandar Kozarev (Programme Associate) and Snezhana Zheleva (Protection Assistant) for their consistent engagement throughout the evaluation. We would also like to extend our sincere thanks to the entire UNHCR team in Sofia for their reflections, support, and facilitation. Likewise, the support received from Joel Kinahan and Saara Ehlert from UNHCR's Evaluation Office was instrumental in enhancing the quality and usefulness of the evaluation results.

Finally, we would like to extend our sincere appreciation to all stakeholders who participated in the evaluation, including, government institutions and municipalities, civil society organisations, United Nations (UN) and European Union (EU) agencies, donors, the private sector, and individuals, for sharing data, insights, and documentation that helped enrich and strengthen the analysis. The evaluation team wishes to express its deep admiration for all forcibly displaced and stateless people in Bulgaria, whose resilience in the face of adversity and belief in universal human values continue to inspire.

Evaluation information at a glance	
<b>Title of the evaluation</b>	Country Strategy Evaluation: Bulgaria 2022-2024
<b>Period covered</b>	2022-2024
<b>Completion year</b>	2025
<b>Type of evaluation</b>	Country strategy evaluation
<b>Countries covered</b>	Bulgaria
<b>Regional office</b>	UNHCR Regional Bureau Europe
<b>UNHCR evaluation manager</b>	Joel Kinahan, with the support of Saara Ehlert
<b>Evaluation team</b>	Eva Capa, Natalia Mihaylova, Diana Radoslavova, Raya Georgieva and Eduardo Whirtmann (AVICENA)

Commissioned by UNHCR's Evaluation Office

Quality assurance of the evaluation by UNHCR's Evaluation Office

# TABLE OF CONTENTS

ACKNOWLEDGEMENTS .....	3
TABLE OF CONTENTS .....	4
LIST OF ABBREVIATIONS .....	5
EXECUTIVE SUMMARY .....	8
1 INTRODUCTION AND BACKGROUND .....	15
2 PURPOSE, SCOPE AND METHODOLOGY .....	16
3 UNHCR CONTEXT AND OPERATION IN BULGARIA .....	20
4 EVALUATION FINDINGS .....	25
5 CONCLUSIONS .....	62
6 RECOMMENDATIONS .....	65
7 APPENDICES .....	70

## List of figures

Figure 1. Budget .....	22
Figure 2. Available funds .....	23
Figure 3. Distribution of available funds by type of implementation and staff and administration costs .....	23
Figure 4. UNHCR Bulgaria workforce.....	24
Figure 5. Indicative allocation and contributions in relation to available funds .....	50
Figure 6. Evolution of the OL/OP rate and the Expenditure /OL rate .....	51
Figure 7. Evolution of available funds (OL) and OL/OP rate by budget line .....	51
Figure 8. Evolution of STAFF & ABOD unit cost per person and OPS unit cost per person .....	52
Figure 9 Evolution of available funds by impact area & outcome and adjustments of the results chain .....	53
Figure 10. Monthly evolution of workforce by type of contract .....	55
Figure 11. Number of CBI recipients versus the total number of forcibly displaced and stateless persons. ....	56
Figure 12. CBI OP vs OL budget.....	57

## List of tables

Table 1. Key Evaluation Questions .....	16
Table 2 Main factors influenced the success of UNHCR's partnership and coordination efforts.....	35
Table 3 Key Findings from Statistical Analysis of CBI (2024–2025) related to protection .....	45
Table 4. Key Findings from Statistical Analysis related to self-reliance2025 .....	47
Table 5 Main factors (contextual and operational) that have overall affected results .....	47

# LIST OF ABBREVIATIONS

<b>AAP</b>	Accountability to Affected Populations
<b>AGD</b>	Age, Gender and Diversity
<b>ALNAP</b>	Active Learning Network for Accountability and Performance
<b>BHC</b>	Bulgarian Helsinki Committee
<b>BRC</b>	Bulgarian Red Cross
<b>CBI</b>	Cash-Based Interventions
<b>CO</b>	UNHCR Country Office
<b>COMPASS</b>	UNHCR's Results-Based Management Platform
<b>CSE</b>	Country Strategy Evaluation
<b>EU</b>	European Union
<b>EUAA</b>	EU Asylum Agency
<b>EU Pact</b>	EU Pact on Migration and Asylum
<b>EvO</b>	UNHCR Evaluation Office
<b>FAR</b>	Foundation for Access to Rights
<b>FRA</b>	EU Agency for Fundamental Rights
<b>FRONTEX</b>	European Border and Coast Guard Agency
<b>GBV</b>	Gender-Based Violence
<b>GDP</b>	Gross Domestic Product
<b>GCM</b>	Global Compact for Migration
<b>GCR</b>	Global Compact on Refugees
<b>HQ</b>	Headquarters
<b>IOM</b>	International Organisation for Migration
<b>KEQ</b>	Key Evaluation Questions
<b>LAR</b>	Law on Asylum and Refugees
<b>MHPSS</b>	Mental Health and Psychosocial Support
<b>MoU</b>	Memorandum of Understanding
<b>MYS</b>	Multi-Year Strategy 2024–2026
<b>NGO</b>	Non-Governmental Organization
<b>OA</b>	Outcome Area
<b>OECD</b>	Organisation for Economic Cooperation and Development
<b>OL</b>	Operating Level
<b>OP</b>	Operations Plan
<b>PDM</b>	Post-Distribution Monitoring
<b>RBE</b>	Regional Bureau Europe
<b>RCM</b>	Refugee Coordination Model
<b>RRP</b>	Regional Refugee Response Plan
<b>RSD</b>	Refugee Status Determination
<b>SAR</b>	State Agency for Refugees
<b>SEIS</b>	Socio- Economic Insight Survey
<b>SDGs</b>	Sustainable Development Goals
<b>SDP</b>	Statelessness Determination Procedure
<b>SHTAFs</b>	Special Homes for Temporary Accommodation of Foreigners
<b>TDP</b>	Temporary Protection Directive
<b>ToC</b>	Theory of Change
<b>ToR</b>	Terms of Reference
<b>TPB</b>	Temporary Protection Beneficiaries
<b>TWG</b>	Tripartite Working Group
<b>UASC</b>	Unaccompanied and Separated Children

<b>UN</b>	United Nations
<b>UNCT</b>	United Nations Country Team
<b>UNEG</b>	United Nations Evaluation Group
<b>UNHCR</b>	United Nations High Commissioner for Refugees
<b>UNICEF</b>	United Nations Children's Fund
<b>UNSDCF</b>	United Nations Sustainable Development Cooperation Framework
<b>USA</b>	United States of America
<b>USD</b>	United States Dollar
<b>WG</b>	Working Group
<b>WHO</b>	World Health Organisation

# READING NOTES

- The report uses the terms *refugees*, *asylum-seekers*, *returnees*, and *stateless persons* when referring to specific groups. When referring to these collectively, the term *forcibly displaced and stateless persons* is used, in line with internal guidance issued by UNHCR's Department of International Protection on terminology for persons in need of international protection<sup>1</sup>.
- *Temporary Protection Beneficiaries*: This term refers to individuals granted protection under the European Union (EU) Council's decision in response to the war in Ukraine<sup>2</sup>. Temporary protection provides specific rights and entitlements, including the right to remain in the host country, access education, work without additional permits, and receive social assistance and temporary housing.
- A funded partner is an entity entrusted by UNHCR to implement projects under a signed agreement, assuming full accountability for resource use and output delivery. These partners may include government bodies, NGOs, intergovernmental or UN organisations, and other non-profits<sup>3</sup>.
- The term *EU Pact* is used throughout the report as an abbreviation for the *EU Pact on Migration and Asylum*, for the purposes of this evaluation.
- The report uses the abbreviated term "*Compass Centres*" to refer to the *Bulgaria Network of Compass Protection and Inclusion Centres*, in line with common usage in UNHCR documents.
- Unless otherwise specified, references to *UNHCR* in the text also include funded partners and strategic allies involved in delivering programmes and services for forcibly displaced and stateless persons). The term "UNHCR and partners" has been intentionally avoided for ease of reading.
- The evaluation team refers to the "Operations planned budget" or Operations needs-based budget" using the acronym *OP*, and the "approved prioritised budget" or funds actually made available to the operation using the acronym *OL* (Operating Level), as presented in the evaluation's Terms of Reference and UNHCR/HCP/2023/06: Policy on Resource Allocation and Management.
  - The Operations plan budget (OP) is UNHCR's official needs-driven budget approved by the Executive Committee. UNHCR's Financial Rules refer to it as UNHCR's "programme budget".<sup>4</sup>
  - The Operating level (OL) is an internal management tool to guide prioritization of activities within the programme budget. The OL represents the maximum spending authority against which commitments and payments can be made based on funds available or total resources available and is provided against the ExCom-approved programme budget. It is used by the High Commissioner per his/her authority to enable operations to undertake prioritized activities, and it is reviewed and adjusted against expenditures and available funding on a regular basis.
- The evaluation uses the following UNHCR budget categories for the analysis of resource planning, allocation and management purposes:
  - The administrative budget obligation document (ABOD) category represents the total administrative non-staff costs for each office, regional bureau and headquarters Division or entity. It is divided into chapters of expenditures. Examples of chapters include, but are not limited to, staff travel, training, cost of office premises.
  - The STAFF category covers the salaries, benefits, and entitlements of the regular UNHCR national and international positions.
  - The operations (OPS) category covers the costs of providing goods and services to forcibly displaced and stateless persons through activities implemented directly by UNHCR and/or partners funded by UNHCR to implement projects (excluding UNHCR's own staff and administrative costs).

---

<sup>1</sup> (Internal) note on selected terminology alternatives to Persons of Concern (PoC) [to UNHCR], DPI, UNHCR, March 2023. 1. "Forcibly displaced and stateless persons" or "People forced to flee and stateless people" - preferred option for regular use - 2. Forcibly displaced and stateless persons. 3. Refugees, asylum-seekers, internally displaced persons (IDPs), [refugee and/or IDP] returnees, and stateless persons.

<sup>2</sup> Website Arrival from Ukraine, (UNHCR Bulgaria).

<sup>3</sup> UNHCR, DSPR Master Glossary. <https://www.unhcr.org/what-we-do/protect-human-rights/protection/master-glossary-terms>

<sup>4</sup> A/AC.96/503/Rev.12, 23 November 2022 (establishing that "the 'UNHCR programme budget' shall mean the comprehensive UNHCR budget for the programmes to be implemented under the impact areas which is approved by the Executive Committee, including the Operational Reserve").

# EXECUTIVE SUMMARY

## INTRODUCTION AND METHODOLOGY

The evaluation of UNHCR's Country Strategy in Bulgaria is part of a series of Country Strategy Evaluations (CSE) designed to contribute to UNHCR's learning and planning processes. CSEs focus on UNHCR's strategic positioning, comparative advantage and organisational and programming performance. The evaluation was conducted from January to August 2025. Conclusions and recommendations will serve as a basis for the revision of the current Multi-Year Strategy (MYS) 2024-26, particularly given the recent global funding trends and the programming restructure within UNHCR. The evaluation covered the whole country, visiting selected geographical areas of operations in Bulgaria, with a particular focus on the five municipalities where UNHCR has established partnerships (Sofia, Burgas, Plovdiv, Rousse, and Varna), as well as the southern border due to the influx of asylum seekers.

The evaluation employed a participatory approach, structured around five key evaluation questions broken into sub-questions aligned with the evaluation criteria of relevance, effectiveness/impact, efficiency, and sustainability. It used a theory-based approach<sup>5</sup> (based on the theory of change - ToC that supports the MYS 2024-26) as the main evaluation framework. The evaluation applied a mixed-methods design, combining qualitative and quantitative data collection and analysis, and using both primary and secondary sources. Primary information was obtained through 63 interviews with key informants, both internal and external. Secondary sources included over 421 internal and external documents reviewed, extensive review of UNHCR corporate databases to assess changes and performance in workforce, financials, partnerships, and results over time; and another database on Cash-Based Interventions (CBIs), using Post-Distribution Monitoring (PDM) data and other sources from 2023–2025. Field visits and observations of selected projects also complemented data collection efforts. Data analysis was structured based on the evaluation matrix. In total, 1,646 text fragments were coded during the desk review and then analysed. Limitations included political instability, corporate system limitations, and gaps in monitoring continuity, which hindered coherent planning and reliable data. Major reprogramming and resource cuts further reduced the evaluation's scope, affecting recommendations, though lessons remain relevant for future programming.

## CONTEXT

The context in 2022–2024 was shaped by two overlapping movements: large-scale arrivals from Ukraine under Temporary Protection and continued mixed movements at the EU external border. Since the escalation of the war in Ukraine, over 3.3 million Ukrainians entered Bulgaria (mostly in transit) and, by end-2024, around 75,000 remained. In parallel, new asylum claims reached 22,500 in 2023 and then fell by 45% to 12,250 in 2024, reflecting reduced arrivals from Türkiye. Child protection needs also rose in this period, with 2,601 unaccompanied and separated children registered in 2024. Statelessness remains comparatively smaller in reported numbers but significant in risk. The 2021 Census recorded 539 stateless persons and 764 of unspecified citizenship, alongside large groups at risk of statelessness (including an estimated 50,000 undocumented Roma).

UNHCR's strategy in Bulgaria shifted markedly over the period, expanding from a mainly advocacy-oriented role to an operational presence in 2022 in response to the Ukraine influx and shifting again to refocusing toward inclusion and solutions in 2024. Financially, total available funds (OL) over 2022–2024 were US\$32.3 million, with US\$14.3 million in 2023 (entirely spent) and US\$11.9 million in 2024. In terms of what was funded and implemented, in 2022–2023 resources prioritised access/documentation and immediate assistance (including CBI and winter support), while 2024 saw increased resourcing for community/livelihood/integration programming and the introduction of an outcome area to operationalise GBV prevention and risk mitigation.

## FINDINGS

### Adapting the strategy (relevance)

---

<sup>5</sup> A theory-based approach is being used to guide and inform the evaluative framework to be used for analysis, and to inform findings, conclusions and recommendations of the CSE.

At the beginning of the period under review, UNHCR's strategic positioning in Bulgaria was characterised by a shift from a primarily advocacy-focused approach to one more actively engaged in operational delivery and institutional support, first during the Ukraine refugee emergency response phase, and later through efforts aimed at their socio-economic inclusion. Its strategy was broadly aligned with Bulgaria's national response to the Ukrainian influx and with regional frameworks, while alignment with EU institutions further consolidated UNHCR's positioning as a trusted protection actor. This strategic transition was shaped by the arrival of persons fleeing Ukraine, which necessitated the expansion of activities related to temporary protection, municipal support, and civil society engagement. UNHCR drew on its technical capacities and partnerships to support emerging coordination mechanisms and offer protection-sensitive guidance within national policy dialogues, while also maintaining a low-profile diplomatic approach with key actors in government and at the EU external borders.

UNHCR and partners developed a solid evidence base through multiple data generation exercises, which informed programming and proved valuable to the organisation's positioning and stakeholders' planning. Yet some gaps were identified in translating evidence into strategy and advocacy. Needs in health, housing, and unaccompanied and separated children (UASC) protection were only partially reflected in the country strategy. Data generation and Age, Gender and Diversity (AGD) efforts were instrumental in documenting the evolution of needs, but implementation of interventions to address inequities remained partial (e.g. children's needs, disability).

Programme reach and visibility expanded in some areas, but UNHCR's engagement remained concentrated on certain population profiles and entry points into the national system. While contributions to asylum access, legal aid, and child protection were recognised by institutional partners, sustained engagement on statelessness, gender-based violence, and the inclusion of non-Ukrainian asylum seekers was more fragmented. UNHCR's capacity, high-level mobilisation and positioning to anticipate and influence longer-term integration frameworks were constrained by institutional changes driven by political instability, limited political will on integration policy, and the absence of a single coordinating authority across multiple public administrations.

### **Synergies (efficiency)**

UNHCR's engagement in Bulgaria has reflected an evolving network of partnerships across humanitarian, institutional, and local actors particularly structured through the Refugee Coordination Model (RCM) and the Ukraine Regional Refugee Response Plan (RRP). Inter-agency collaborations demonstrated complementarities in the initial stages of the response, and UNHCR played a key convening role; however, limited role delineation sometimes led to duplication and inefficiencies. Coordination roles shifted rapidly in response to the Ukraine crisis, with UNHCR taking on responsibilities that spanned technical support, resource mobilisation, and inter-agency dialogue. The organisation operated across formal structures—such as national planning processes and sectoral working groups—as well as informal relationships with municipalities, non-governmental organisations (NGOs), and grassroots organisations that emerged during the emergency phase. These interactions varied in duration and formality but collectively expanded the operational footprint of the refugee response.

The scope and rhythm of these synergies were shaped by both contextual and organisational factors. In contexts where public institutions had pre-existing mandates or resources, UNHCR functioned primarily as a facilitator and source of technical guidance. In newer or under-resourced thematic areas its role was more operational and directly supportive. Some partnerships were sustained through regular consultation and joint planning, while others remained transactional or reactive. The emergence of multi-actor platforms also revealed overlapping roles (e.g. child protection, employment services), coordination fatigue or inconsistent representation (e.g. fluctuating engagement and representation in working groups), which influenced the degree to which UNHCR could mobilise others strategically. Due to the fluctuating political context, the transition of leadership in sectoral coordination mechanisms to government counterparts has been limited.

### **Effectiveness**

UNHCR advanced a broad portfolio of activities—ranging from protection and legal aid - to child and

community services and cash assistance—that together helped safeguard protection space. Advocacy and technical leadership by UNHCR supported rights-compliant asylum procedures, legal safeguards, and access to documentation, while training strengthened institutional capacity. Yet, external factors such as pushbacks, unequal support of non-Ukrainian asylum seekers, and gaps in Refugee Status Determination (RSD) and Statelessness Determination Procedure (SDP) limited broader impact. The organisation adapted its role and delivery models in response to both emergency needs and pre-existing capacities and gaps within the government’s response, aligning with national systems when feasible and stepping in where institutional coverage was weak. Legal advocacy, municipal support, and CBI expansion emerged as key interventions.

UNHCR’s support contributed to shaping different dimensions of the protection landscape, while also generating entry points for other actors to engage with refugee inclusion. CBI provided timely relief for short-term needs but had limited impact on broader protection outcomes and only partially functioned as an entry point to national social protection, as it was not originally designed for these purposes. The *Compass Centre* model fostered inclusion and local partnerships, though use of this approach remained concentrated among the Ukrainian population. Socio-economic integration remained fragile, constrained by underdeveloped private-sector collaborations, the absence of a state-led integration framework, and a reliance on donor-funded NGO or parallel service delivery.

Programmatic adaptations varied by domain: in some cases, legal pathways and service access improved; in others, coverage remained partial or focused on specific nationalities. Factors such as delivery timelines, municipal capacity, and partnership frameworks influenced how and where outcomes could materialise. From the programmatic perspective, the period was marked by differentiated responses—shaped by the evolving context, political instability, limited national and local ownership, uncertainty in funding, and institutional proximity.

### Structure and fit for purpose

From 2022 to 2024, UNHCR Bulgaria recalibrated its structure and resource strategy to respond to the scale and urgency of the Ukraine refugee crisis, while maintaining high implementation rates<sup>6</sup>. Staff and budget capacity were rapidly expanded in 2022, at the start of the Ukraine crisis, followed by strategic refocusing in 2023 and contraction in 2024. While this dynamic enabled flexible mobilisation in high-priority areas—such as cash-based assistance, reception support, municipal engagement and the rapid establishment of service infrastructure (e.g. Blue Dots and later *Compass Centres*), it also revealed a pattern of planning driven more by funding availability than by a long-term approach. Recent 2025 budget cuts<sup>7</sup> (–60% staff, –40% activities) have had a significant impact on the operation’s capacity, making it difficult to reconfigure the CO’s strategy and presence.

Between 2022 and 2023, the CBI programme in Bulgaria expanded significantly, achieving high transfer efficiency (87% of funds channelled directly to households) and adapting its design to include social inclusion elements like education. However, the November 2024 revisions to the CBI programme, tightened the eligibility criteria and introduced a uniform lump-sum transfer (based on 75% of the poverty line). This may have streamlined delivery, but it simultaneously weakened the consistent inclusion of highly vulnerable, yet less visible groups, and reduced the programme’s adaptability to diverse and evolving household needs.

The CO’s adaptive structure and responsiveness was made possible by high absorption capacity and agile deployment mechanisms, including temporary staffing and short-term partnerships. Resource allocation was aligned with strategic objectives during the first phase of the emergency response, but UNHCR Bulgaria’s operational capacity was undermined by delays in recruitment, high staff turnover, fragmentation across teams, and vacancies in roles such as Gender Based Violence (GBV), livelihoods and data management. Reliance on a narrow donor base (mainly bilateral US funding) and limited diversification in terms of donors funding the Bulgaria CO affected the CO’s ability to plan predictably once U.S. funding to the organisation

---

<sup>6</sup> UNHCR’s budget for 2022–2024 amounted to US\$32.3 million. By year this is –US\$6.1 million, (2022), US\$14.3 million (2023), and US\$11.9 million (2024).

<sup>7</sup> Although outside the scope of the evaluation, the budget reductions are mentioned due to their critical implications for the planning of UNHCR Bulgaria and the use of the evaluation recommendations.

was reduced

## Sustainable integration into national programs

While many of UNHCR's initiatives in Bulgaria were launched in response to urgent needs, they have also revealed potential pathways for embedding protection within national systems. Although still at an early stage, experiences such as the operationalisation of the *Compass Centres* and collaboration with municipalities offer initial lessons that can inform the development of more institutionalised and locally led responses. However, the essential conditions for their integration and continuity within public services have not yet been established. To sustain these gains, UNHCR is well-positioned to shift from direct service delivery to a more strategic enabling role, supporting system-building efforts in areas such as reception capacity, local integration, and national planning mechanisms, even within a complex socio-political environment.

The implementation by Bulgaria of the EU Pact presents a timely opportunity to consolidate UNHCR's strategic influence within evolving governance structures. The organisation's contributions to legal and policy reform in Bulgaria, alongside its role in facilitating cross-sectoral coordination, provide a strong foundation. However, leveraging this position will require UNHCR to stabilise internal expertise, ensure continuity in technical engagement, and advocate for coherent linkages between emergency response mechanisms and long-term integration strategies.

## CONCLUSIONS

### Strategic level

**Adaptive strategy - UNHCR has demonstrated agility in adapting its strategy to the evolving context in Bulgaria, significantly expanding its role after 2022 in response to the Ukraine crisis and shifting from an advocacy-centred approach to one encompassing direct assistance, protection, and solutions for forcibly displaced and stateless persons.** This adaptive posture allowed UNHCR to make an important contribution in supporting the Government of Bulgaria's response and to broader protection efforts. It should be stressed that UNHCR cannot realistically cover all sectors or meet the needs of all population groups, both due to resource constraints and because states carry the primary responsibility for refugee response—including ensuring access to health, housing, and education. Within this context, UNHCR's role is to set clear priorities within its mandate, focus on areas where it has the greatest added value, and work through partnerships to complement state efforts. However, the evaluation highlights that despite this approach, and while programme design increasingly leveraged diverse evidence sources and participatory tools, systematic integration of this evidence into strategic planning remained uneven. Disparities remained insufficiently addressed for non-Ukrainian refugees, stateless persons, and individuals facing vulnerabilities such as GBV and disability.

**UNHCR alignment with global, regional, and national priorities - UNHCR's alignment with global and regional protection frameworks has enabled the practical implementation of the Global Compact on Refugees (GCR), the EU's Temporary Protection Directive, and the RRP. During the response to the Ukraine crisis, UNHCR's alignment with national priorities in Bulgaria ensured a coherent response grounded in technical expertise and sustained institutional partnerships.** UNHCR's collaboration with the State Agency for Refugees (SAR), other national counterparts, and municipal governments contributed to mainstreaming refugee protection into state structures at multiple levels, laying the groundwork for the full integration of refugee services into municipal systems as frontline providers. UNHCR's influence in shaping legal and policy reforms (including the Law on Refugees) was enabled by its constructive diplomacy and convening role, though political volatility and inconsistent inter-agency coordination limited the effectiveness of its advocacy. UNHCR's alignment with the EU Pact is evident in its advocacy around Bulgaria's National Implementation Plan particularly in areas such as independent border monitoring, child protection, legal aid, and statelessness. Nonetheless, institutional and political constraints have hindered a more assertive advocacy to promote a rights-based asylum agenda.

**UNHCR's role at EU external borders - UNHCR's CO in Bulgaria has leveraged its mandate in the Tripartite Border Monitoring Agreement with the Border Police and the Bulgarian Helsinki Committee**

**to support protection-sensitive access to territory at the EU's external borders.** UNHCR has played a significant role as evidenced by its contributions to discussions on the EU Pact, the development of the Bulgarian National Implementation Plan, and cooperation with Frontex and other key stakeholders. The border monitoring capacities, expertise, and tools developed through the long-standing Tripartite Working Group with the Border Police have strong potential to be integrated into the newly established independent national monitoring mechanism under the Ombudsman's office. However, UNHCR's engagement on non-refoulement and access to procedures along the Turkish-EU border was comparatively limited, partly due to increasingly limited resources and a strategic shift aimed at enhancing impact. This was evidenced by its less active participation in the Border Monitoring Working Group and limited evidence for monitoring in detention centres. Following this change of approach, UNHCR revised its training activities for Border Police personnel, focusing on skills development rather than knowledge transfer, and strengthened coordination with EU institutions (FRA, Frontex FRO). Despite these adjustments, the ongoing tripartite agreement and the evolving institutional landscape presented renewed opportunities for UNHCR to advocate for principled border governance, in line with the GCR and tapping into the complementarities with the GCM, thereby helping to counterbalance the prevailing security-driven approach within Bulgaria's migration governance.

### Operational level

**C4) Coordination and complementarity of the refugee response - UNHCR has contributed to a more coordinated and coherent refugee response in Bulgaria through its leadership in sectoral working groups, bilateral engagement, and support to civil society and municipalities. These efforts have fostered complementarity and technical collaboration among a diverse range of stakeholders working on protection and inclusion.** UNHCR has played a central role in shaping coordination frameworks and mechanisms, leading the coordination of sectoral working groups under the Refugee Coordination Model, and bringing together diverse actors to implement the Ukraine RRP. Challenges remain in ensuring structured, inclusive, and sustained coordination (particularly in promoting local ownership, institutionalising coordination mechanisms, and clarifying roles with other UN and EU agencies). Partnerships with grassroots and refugee-led organisations have enhanced local relevance and diversified service delivery but are subject to UNHCR's available funding in key areas. However, municipal engagement has been uneven, resulting in inconsistent local-level responses. Additionally, at times, limited internal coordination (across UNHCR's teams) has affected the coherence of engagement, especially with funded partners. Externally, political volatility, mixed institutional capacity, and the rapid emergence of new funded partners have required significant investment in capacity-building. While promising partnerships with the private sector and academia have emerged, they require deeper operationalisation to generate any solid results.

**Refugee status determination and protection - UNHCR has made meaningful contributions to advancing protection outcomes in Bulgaria, particularly in areas such as access to asylum, legal aid, child protection, and community engagement. Through strategic partnerships, capacity-building, and advocacy, UNHCR has supported improvements in border monitoring, refugee status determination, and frameworks for refugee inclusion.** Given the large scale of arrivals from Ukraine, the response understandably focused primarily on the needs of those seeking temporary protection. However, other groups (particularly non-Ukrainian asylum seekers and stateless persons) received comparatively less programmatic attention, despite often facing protection and inclusion challenges. Overall, Ukrainian nationals benefited from free access to territory and a facilitated status, while asylum-seekers, refugees, and stateless persons (largely from MENA countries) encountered border rejections, structural discrimination, and more limited access to rights and services. While UNHCR's approach for Ukrainians centred on operational support and service delivery in coordination with national and local stakeholders, its engagement for other groups relied more heavily on advocacy efforts to address systemic barriers. However, persistent gaps remained in addressing non-refoulement and ensuring procedural fairness in refugee status determination, which are ultimately responsibility of the Government of Bulgaria (GOB). These gaps coincided with a shift in UNHCR's approach from open, public advocacy to more discreet channels of intervention. UNHCR also reduced interaction with government actors, for example, decreasing participation in working groups, making less visible interventions, and providing fewer training activities. This change in UNHCR's approach may explain why some partners perceived work on non-Ukrainian refugees and asylum seekers as being relegated to lower priority. UNHCR efforts in achieving results in protection have varied by area, with stronger results in sectors where expertise and capacity were more established (e.g. asylum, legal aid, child protection, community engagement) while others, such as health (including MHPSS) achieved weaker outcomes. Greater attention could have been

paid to age, gender and inclusion (including for LGBTQI+ individuals).

**Socio-economic inclusion and integration - Efforts to promote socio-economic inclusion and local integration have gained traction through municipal and private sector partnerships, employment initiatives, and education support, yet remain constrained by limited employment programmes, administrative barriers, insufficient resources allocated at the municipality level, limited university admission quotas, and fragmented service delivery.** UNHCR's support has focused on expanding access to employment-related services and resources for refugees and asylum seekers in the *Compass centres*, career centres, as well as via the *Refugee Employment Platform*. The centres provide critical information and guidance, but there are no formalised pathways that ensure systematic follow-up or integration into municipal or national service delivery frameworks. While some municipalities have actively promoted inclusion and integration, others have shown more limited engagement. *Compass Centres* are not embedded within municipal service portfolios or long-term planning frameworks but offer a promising avenue going forward.

**Cash-Based Interventions - UNHCR's CBIs have provided immediate financial relief but have fallen short of advancing protection and fostering self-reliance.** CBI has evolved from emergency response to more structured assistance, primarily targeting refugees from Ukraine. Between 2022 and 2024, cash assistance expanded its coverage, delivering immediate financial relief, reducing stress, and improving the coverages of basic needs, particularly among women and younger recipients. However, its potential to contribute to broader protection outcomes and self-reliance remains underutilised. The 2024 shift to multi-month and multi-purpose cash assistance, including the expansion of winterisation and education grants, was a positive step. While the refinement of eligibility criteria aimed to better target limited resources, some partners expressed that this approach could unintentionally overlook less visible yet highly vulnerable groups (e.g. GBV survivors or new arrivals in 2024) and undermine earlier gains in inclusiveness. Additionally, persistent gaps in targeting, weak referral systems and limited integration with national social protection and inclusion frameworks have constrained the achievement of more sustainable outcomes.

**National capacities and ownership - UNHCR's efforts risk limited long-term impact without stronger integration into national systems. Sustainability depends on government ownership, scalable and integrated models, and clear transition strategies beyond short-term planning cycles.** While UNHCR has laid important foundations through strategic partnerships, municipal engagement, and contributions to the EU Pact implementation, systemic change remains constrained by political instability, limited institutional capacity, and the absence of a national integration programme. UNHCR has taken initial steps toward advancing socio-economic inclusion; however, the development of these efforts was constrained by frequent political changes which complicated institutional continuity and long-term planning. While foundations were laid, opportunities remain to further embed sustainability within government systems; particularly through the integration of *Compass Centres* into municipal service portfolios, formalisation of socio-economic inclusion frameworks, and alignment of employment and education initiatives with national programmes. The implementation of the current multi-year strategy, including support to the National Implementation Plan for the EU Pact, is increasingly challenged by reduced organisational and financial capacities, with several processes extending beyond the MYS timeframe. Some initiatives, such as the *Compass Centres*, have demonstrated value but risk remaining project-based without formal transition strategies or state-led frameworks for social protection.

### Organisational level

**Operational capacity - Between 2022 and 2024, while UNHCR's CO demonstrated an organisational structure capable of adaptive and rapid response, internal constraints undermined the coherence and sustainability of its interventions.** The CO's structure supported flexible resource reallocation and timely responses, notably through mechanisms like the CBI programme and *Compass Centres*. Internally, fragmented responsibilities— sometimes leading to siloed work —along with over-reliance on temporary contracts and staff rotations, hindered coordination. Externally, donor dependence and underfunding in key sectors further constrained the CO's ability to implement its strategic vision. The resulting gap between ambition and capacity limited UNHCR's ability to demonstrate the sustained impact of its protection and inclusion efforts.

**Results-based management performance - Since 2022, UNHCR CO's results framework has undergone successive adjustments to refine and refocus strategic objectives. Despite improvements introduced in 2024—at the corporate and country levels, including by UNHCR CO—the weak alignment between budget allocations, indicators, and expected results has undermined the operation's ability to consistently measure progress and performance, particularly between 2021 and 2023.** Although a harmonised monitoring framework, standardised core output indicators, and other changes were adopted in 2024, several technical functions remained without dedicated staff and inconsistencies in data continued to affect results-based management. Furthermore, fragmented information systems, limited traceability of prioritisation, fluctuations in UNHCR CO's budget throughout the year, and limited documentation of strategic shifts have constrained the analysis of performance and accountability.<sup>8</sup>

## RECOMMENDATIONS

The following recommendations are targeted at UNHCR's Bulgaria Country Office for consideration:

1. Transition to a structured, inclusive, and locally owned coordination mechanisms by enhancing internal coherence, where possible delineating responsibilities between UNHCR and other UN agencies, and further investing in long-term, strategic partnerships across sectors.
2. Strengthen support for protection-sensitive access to territory at the EU's external borders.
3. Ensure the sustainability of protection outcomes by embedding services for refugees, asylum-seekers, and stateless persons within national systems and by fostering long-term institutional ownership and accountability.
4. Support national and local authorities to institutionalise socio-economic inclusion efforts by embedding initiatives, such as the Compass Centres, into municipal service portfolios and medium-term development plans, while also broadening private sector and academia engagement.

---

<sup>8</sup> These are organisational challenges related to UNHCR's systems and procedures, which have been repeatedly identified in previous Country Strategy Evaluations.

# 1 INTRODUCTION AND BACKGROUND

- 1) This Country Strategy Evaluation (CSE) was commissioned by the UNHCR Evaluation Office (EvO) following a request by the UNHCR Bulgaria Country Representative and endorsed by the UNHCR's Regional Bureau for Europe (RBE). The purpose of this evaluation was to assess the strategic and operational relevance, effectiveness, coherence, efficiency and sustainability of UNHCR Bulgaria's Country Office (CO), with a view to identifying challenges and opportunities to inform its future operational design and strategic direction. The evaluation aimed to extract lessons that can inform UNHCR's strategic positioning and multi-year planning in other similar contexts. This CSE serves as a mid-term assessment of the progress made under the current 2024-2026 Multi-Year Strategy (MYS) and informs UNHCR Bulgaria's next MYS cycle, planned to start in 2027. The evaluation also looked at the period following the escalation of the war in Ukraine and UNHCR's expanded role in the country, to help reflect on UNHCR's strategic positioning in Bulgaria vis-à-vis the Ukraine situation.
- 2) The evaluation was conducted from January to August 2025, with fieldwork taking place in March 2025 and preliminary results available by April 2025. The drafting and revision of the various versions of the report occurred between June and August 2025. The findings and recommendations of the evaluation may be utilised to inform the planning or revision of the current Multiyear Strategy. The evaluation period was characterised by internal UNHCR reforms and restructuring, particularly visible from 2022 onwards, including: i) a change in the structure in response to the Ukraine Refugee Situation; and ii) the development of Multi-Year Country Strategies.
- 3) Although outside the scope of the evaluation, UNHCR began a significant restructuring process during the first half of 2025, due to budget cuts resulting from decisions made by the new United States administration. These reductions have had a global impact and, in the case of the UNHCR CO, led to a significant decrease in workforce and operational capacity in the country. In this context, UNHCR developed corporate guidelines (February 2025) to inform the prioritisation of country offices. As these guidelines are currently being implemented, they influence the formulation of recommendations.
- 4) The primary audiences for this evaluation are UNHCR Bulgaria Country Representative, the Bureau Director for Europe and other UNHCR's country and bureau staff. The secondary audience is in-country partners, including the Government of Bulgaria and local authorities, development actors and the private sector.

## 2 PURPOSE, SCOPE AND METHODOLOGY

### 2.1 Purpose and scope

- 5) The CSEs are intended to generate evidence to strengthen improvements in protection, solutions, and assistance for the Forcibly Displaced and Stateless People and communities. These evaluations focus on UNHCR's strategic positioning, comparative advantage, and organisational and programmatic performance.
- 6) The geographical scope of the evaluation encompasses UNHCR's operations in Bulgaria, with a particular focus on the five municipalities where UNHCR has established partnerships (Sofia, Burgas, Plovdiv, Rousse, and Varna), as well as the southern border due to the influx of asylum seekers. The operational scope includes UNHCR's entire portfolio in Bulgaria, with emphasis on the evolution of UNHCR's role in the country, partnerships, CBI, municipal capacity-building, and implementation of the EU Pact. The temporal scope covers the period from 2022 to 2024, to assess strategic shifts and operational outcomes.

### 2.2 Evaluation questions

- 7) The evaluation is structured around five evaluation criteria (relevance, coherence, effectiveness, efficiency, sustainability), based on the Organisation for Economic Co-operation and Development (OECD) definitions, and five main evaluation questions (see Table 1 below). As part of the inception phase<sup>9</sup>, some changes to the evaluation matrix (Appendix 2) were suggested, mainly by refining evaluation questions and sub-questions. These were intended to avoid duplications, better delineate the areas of inquiry, evaluation criteria, and clarify the scope of the evaluation questions (delving deeper into protection interventions and social-economic integration). For the final version of the report, overlapping findings across sub-questions were consolidated, and sub-question 4.4 was removed, reducing duplication without altering the overall content.

**Table 1. Key Evaluation Questions**

KEY EVALUATION QUESTIONS	CRITERIA
KEQ1: How strategically has UNHCR been positioned within Bulgaria given the needs of refugees, asylum seekers, and stateless persons and the national and regional context?	RELEVANCE
KEQ2: To what extent has UNHCR been able to promote and benefit from synergies with key stakeholders and to play a catalytic role, mobilising other relevant actors around the cause of refugees, asylum seekers, and stateless persons so as to maximize the leverage of its interventions?	COHERENCE
KEQ3: To what extent and quality has UNHCR achieved and contributed to envisioned results?	EFFECTIVENESS
KEQ4: In light of RBE prioritization decisions in resource allocations across operations, to what extent was UNHCR's Bulgaria structure, staffing and resource allocation adequate and fit to meet the objectives set out in the 2022-2023 annual strategies and the MYS?	EFFICIENCY
KEQ 5: How can UNHCR build on results achieved to date, current challenges, and opportunities, to further leverage its strategic position and influence within the country and region to advance collective efforts towards protection and solutions?	SUSTAINABILITY

### 2.3 Methodology

#### 2.3.1 Evaluation framework

- 8) The evaluation uses the OECD evaluation criteria and has structured the analysis into three distinct but interrelated levels (strategic, operational and organisational<sup>10</sup>). The evaluation employed a participatory

<sup>9</sup> UNHCR Country Strategy Evaluation for Bulgaria, Inception report, March 2025.

<sup>10</sup> The strategic level analyses UNHCR's higher-level contributions in terms of political, legal, and systemic transformations within the framework of international protection. The operational level primarily analyses UNHCR's achievements and difficulties in implementing its different programmes and interventions; in general, this level of analysis is related to the criterion of effectiveness. The organisational level primarily analyses resource management (human, technical, financial and logistical); in general, this level of analysis is related to the criterion of efficiency and assesses the extent to which UNHCR's resources were fit to achieve its objectives ("fit-for-purpose").

approach, structured around five key evaluation questions broken into sub-questions aligned with the evaluation criteria of relevance, effectiveness, efficiency, sustainability (Appendix 2). The evaluation uses a non-experimental design, adopts the principles of participation<sup>11</sup> and utilisation<sup>12</sup>, and is both summative and formative in nature. It uses a theory-based approach<sup>13</sup> (based on the theory of change - ToC) that supports the MYS 2024-2026) as the main evaluation framework. The ToC (Appendix 10) provides a basis for understanding the strategy's causal pathways: how inputs and activities lead to intended outcomes, and the assumptions behind change pathways to support UNHCR Bulgaria in its forward-looking lesson-learning. The evaluation also incorporates the international (e.g. Geneva Convention and associated instruments, Global Compact on Refugees [GCR], Comprehensive Refugee Response Framework<sup>65</sup>), regional (e.g. EU Directives and Regulations, the EU Pact) and national (e.g. laws and public policies on migration, asylum, etc.) frameworks on asylum and international protection, as well as the 2030 Agenda perspective linked to the Sustainable Development Goals (SDGs).

### 2.3.2 Data collection methods

9) The evaluation used a mixed methods design, combining qualitative and quantitative data collection and analysis, and using both primary and secondary sources, as detailed below. The evaluation was conducted under a hybrid format (face-to-face and remote), using the following methods:

- **Key informant semi-structured interviews:** A total of 63 key stakeholders were identified and grouped into seven main categories (Appendix 4.1.2). Based on the mapping, 50 interviews with 58 people were conducted (38% men and 62% women) with UNHCR (CO and RBE), government institutions, funded partners<sup>14</sup>, UN agencies, donors, and other key stakeholders, representing the seven categories of stakeholders in locations where UNHCR is present (Appendix 4.1.2 and Appendix 6).
- **Desk review:** 421 internal<sup>15</sup> and external documents were consulted (non-systematic review<sup>16</sup>) (Appendix 4.1).
- **Review on UNHCR databases:** The evaluation conducted two main quantitative analyses: one on organisational performance using UNHCR's corporate databases (incl. COMPASS, Cloud ERP, WORKDAY) to assess changes in workforce, financials, partnerships, and results over time; and another on CBIs, using Post-Distribution Monitoring (PDM) data and other sources from 2023–2025. Both analyses were guided by the UNHCR-AVICENA 2024 framework on data protection and triangulated with qualitative evidence.
- **Direct observation:** The evaluation team visited the municipalities of Sofia, Plovdiv, Varna, and Burgas including the *Bulgaria Network of Compass Protection and Inclusion Centres (Compass Centres)*, Burgas municipality transition home for unaccompanied children, and Plovdiv "Second Home" accommodation centre for Ukrainians.

### 2.3.3 Data analysis and validation

10) Data analysis was structured based on the evaluation matrix. *Atlas.ti* software was used to codify and analyse 107 fields (documents and interviews). In total, 1,646 text fragments were analysed (Appendix 7). The analysis followed an age, gender, diversity and equity approach, in line with the guidelines of the United Nations Evaluation Group (UNEG), UNHCR Age, Gender and Diversity Policy, and the United Nations System-wide Plan of Action on Gender Equality and the Empowerment of Women. Data triangulation was the main validation process. Following the field phase, a debriefing was held with the UNHCR team in Sofia

---

<sup>11</sup> Involve a wide range of stakeholders and adopt a co-creation approach to define recommendations, agreed with the CO and partners.

<sup>12</sup> Develop practical recommendations for UNHCR's positioning in Bulgaria and operations that take into account the evolving regional and country environments in which the country office operates.

<sup>13</sup> A theory-based approach underpins the evaluative framework, guiding the analysis as well as informing the findings, conclusions, and recommendations of the CSE.

<sup>14</sup> Appendix 9 contains the list of funded partners and the activities they carry out by outcome areas.

<sup>15</sup> The evaluation team initially analysed 306 documents. After submitting the first draft of the report, they received a further 115 documents.

<sup>16</sup> A non-systematic review that is meant to be an informative, rather than all-encompassing, review of the literature on a topic. Generally, it takes an in-depth but not systematic approach to a specific research question. Largely based on a knowledgeable selection of current, high-quality articles on the topic of interest. May or may not follow a predefined protocol (University of Liverpool, 2024).

and the EvO to share emerging findings. This process of analysis, and validation of findings will be further supported by a workshop to co-create and validate conclusions and recommendations.

#### 2.3.4 Evaluation governance and Quality assurance

- 11) The core evaluation team consisted of five evaluation experts, with a multidisciplinary approach (Appendix 8). The evaluation was overseen by a UNHCR Evaluation Officer (EvO), the UNHCR focal point (CO) in Sofia and the evaluation team leader. Regular meetings were held throughout the process to oversee the evaluation process. The Evaluation Reference Group, comprised representatives of UNHCR partners and stakeholders in Bulgaria, provided input during the inception phase but was unable to fulfil the role initially envisaged for it due to contextual factors. Evaluation quality assurance is based on UNHCR's evaluation quality assurance guide (UNHCR, 2023h), UNEG norms and standards (UNEG, 2016), the Active Learning Network for Accountability and Performance (ALNAP) guide (ALNAP, 2025), and the OECD/Development Assistance Committee (OECD/DAC, 2021). The evaluation quality assurance was carried out throughout the evaluation process at two levels: i) internally, by the evaluation team through a process of peer review and self-assessment; and ii) by UNHCR, in particular the CO and the EvO.

#### 2.3.5 Ethical issues

- 12) The evaluation followed the UNEG Codes of Conduct (UNEG, 2008) and the United Nations Ethical Guidelines (UNEG, 2020), the UN Supplier Code of Conduct (UN, 2024), UNHCR's policies on age, gender, diversity, and disability inclusion (UNHCR, 2019), and in data protection (UNHCR, 2022e). The evaluation was also guided by international ethical guidelines and best practices for quality assurance, evaluation and research processes, without the need for ethical approval if certain principles are ensured. The evaluation has systematically sought voluntary participation or informed consent from all interviewees and did not require the approval of an ethics committee as no personal data was collected, no children, victims of violence or abuse, or particularly vulnerable profiles were interviewed or contacted.

#### 2.3.6 Limitations and observations on UNHCR's Results-Based Management and planning systems and their effects at the country office level

- 13) The evaluation faced several limitations stemming from contextual, corporate, and organisational factors (see Appendix 4.2). At the contextual level, political and institutional instability, high staff turnover within national institutions, and the appointment of a new Bulgarian government in January 2025 meant that interviews had to include former staff and partners no longer in post.
- 14) At the corporate level<sup>17</sup>, limitations and constraints in UNHCR's systems, identified in previous CSEs and by other independent bodies (OIOS, 2024; MOPAN, 2024) and the Inspector General's Office<sup>18</sup>, have affected the CO's capacity for planning, reporting, and monitoring. While global systems fall outside the country office's control, their limitations affected the consistency of planning, monitoring, and management at the country level. Examples of corporate system limitations include gaps in the use of COMPASS, fluctuations in the use of indicators across years, poorly documented baselines and targets, and limited application of organisational markers and disaggregation (e.g. disability), among others.

At country office level, monitoring indicators lacked continuity across 2022–2024, limiting the ability to track progress over time within UNHCR's multi-year strategy. The reallocation of unchanged outputs under different outcomes created confusion and undermined the coherence of planning. There were discrepancies in the budget figures across sources, and the OP budget was not sufficiently disaggregated by partner. Although UNHCR provided explanations for some of these changes, concerns remained regarding the coherence of planning and budgeting processes. In some cases, the relationship between output, outcome, and impact indicators remained unclear. The quantitative data, presented in Excel files containing raw data from various UNHCR systems suffer from a lack of harmonisation and inconsistencies between the various sources (e.g.

---

<sup>17</sup> The country strategy evaluations do not assess UNHCR's corporate systems and processes at the global level; rather, they document, in each operation (to the extent possible with the available data), their suitability for achieving the intended objectives. In certain areas, the findings from the country strategy evaluation in Bulgaria (as well as from other operations) are consistent with those identified by other independent bodies regarding the functioning of UNHCR's systems and processes globally.

<sup>18</sup> The Inspector General's Office, Strategic Oversight Report – Analysis of prevalent oversight findings and root causes (2023).

Terms of Reference, UNHCR reports, official publications, *ad hoc* XLS files). These issues—stemming from limitations in UNHCR’s systems and processes —have affected the reliability and adequacy of the data for effectively monitoring operational activities, particularly from 2021 to 2023. Some corporate improvements introduced through COMPASS were reflected in the planning processes of the UNHCR Bulgaria operation—most notably, the definition of ‘core’ output indicators, which contributed to greater harmonisation and strengthened results monitoring in 2024. In addition, the CO developed an Assessment, Monitoring and Evaluation Workplan 2024–2026, and completed the implementation of the auditors' recommendations, both of which enhanced planning and results monitoring for the 2024 – 2026 multi-year strategy.

# 3 UNHCR CONTEXT AND OPERATION IN BULGARIA

Further details on the operational context and UNHCR’s activities in Bulgaria are available in Volume II of the Appendices (Appendix 3).

## 3.1 Operational Context

### 3.1.1 National socio-economic context

- 15) As of December 2024, Bulgaria’s population was 6.4 million, 1.4% of the EU total, continuing a slight annual decline since 2022 (National Statistical Institute, 2024). According to national statistics, the population is 84.6% ethnic Bulgarian, 8.4% Turkish, and 4.4% Roma (National Statistical Institute, 2021). In 2023, Bulgaria’s Human Development Index (0.845) placed it 55th globally (UNDP, 2025), reflecting gains in infant survival, education, and economic stability since EU accession in 2007. Although Bulgaria’s GDP per capita reached €24,200 in 2023 (64% of the EU average), it remained the EU member with the lowest per capita GDP and the highest income inequality. Economic growth raised living standards from 2016–2020, but pandemic effects, inflation, and job losses among less educated groups reversed some progress (World Bank, 2024).
- 16) The ageing and shrinking workforce, together with a high proportion of economically inactive young people, constrain employment gains. Inactivity is higher among Roma people, persons with disabilities, and those with lower education. While overall employment for ages 20–64 rose to 76.8% in 2024, the youth rate fell to 33.9%, with 16.5% of young people not in education, employment, or training (NEETs), (Eurostat, 2024). Political instability<sup>19</sup>, with seven parliamentary elections between 2021 and 2024, hindering progress in legislative and policy reforms, limiting potential advances in asylum and protection systems (UNHCR, 2023). A new government took office in January 2025.

### 3.1.2 Overview of EU and National Refugee Response Frameworks (2022–2024)

- 17) Between 2022 and 2024, Bulgaria’s refugee response was shaped by two key EU frameworks—the EU Pact and the TPD—as well as the country’s evolving national protection architecture. The EU Pact, adopted in May 2024, introduced a harmonised legislative framework for asylum, migration management, integration, and border control, with a mandatory yet flexible solidarity mechanism to support frontline Member States. Bulgaria, as a frontline EU Member State sharing a border with Türkiye and situated along the Eastern Mediterranean and Balkan migration routes, is often among the first countries to receive asylum seekers and migrants entering the Schengen area, so these reforms are particularly relevant (European Commission, 2024a, 2024b).
- 18) In response, the Government approved a National Implementation Plan in December 2024, outlining reforms across ten legislative areas, including Eurodac usage, reception standards, asylum procedures, returns, solidarity contributions and the introduction of a new Migration and Asylum Law expected in 2025. UNHCR supported this process by providing technical assistance, advocating for safeguards, delivering protection and humanitarian assistance, and engaging in national and regional coordination platforms, while at the same time emphasising the need for stronger procedural guarantees and addressing related concerns.
- 19) The TPD, activated on 4 March 2022 to respond to the large-scale displacement from Ukraine, provided the legal and operational foundation for Bulgaria’s initial refugee response between 2022 and 2024. In Bulgaria, the TPD underpinned the government-led Programme for Humanitarian Support—later expanded to include integration measures in 2025<sup>20</sup>—implemented under national leadership with UNHCR support. While the TPD framework facilitated rapid legal stay and access to services, national implementation prioritised emergency accommodation and basic assistance, with slower progress on long-term integration.

<sup>19</sup> UNHCR Risk Register Extract – Bulgaria (2022, 2023, 2024). Internal document.

<sup>20</sup> Renamed the Programme for Humanitarian Support and Integration in 2025.

### 3.1.3 The national response to the needs of forcibly displaced and stateless persons, with a focus on refugees from Ukraine.

- 20) The national response has evolved significantly since the escalation of the war in Ukraine in 2022. The UN General Assembly adopted a resolution urging international efforts to de-escalate the conflict and support the humanitarian response (United Nations, 2022). UNHCR and its partners mobilised through the Regional Refugee Response Plan (RRP), which shifted from emergency response in 2023 to medium-term inclusion and resilience in 2024 (UNHCR, 2022a). The 2024 RRP emphasises integration into national systems, socio-economic inclusion, and localisation, with greater engagement from host governments, refugee-led organisations, and local actors.
- 21) In Bulgaria, the Refugee Coordination Mechanism was formalised in 2023, bringing together several specialised working groups focused on areas such as cash assistance, protection, legal matters, education, and mental health, to enhance the overall response to refugee needs (UNHCR, 2023i).
- 22) The Government of Bulgaria introduced sectoral legal, institutional, and programmatic measures to enhance the refugee response, although state-led initiatives remained largely ad hoc and driven by external partners. The national asylum system, anchored in the Law on Asylum and Refugees (LAR), faced operational and institutional shortcomings, including limited capacity and procedural inefficiencies. While progress was made, challenges such as reliance on detention and inadequate access to legal aid persisted; the latter, though formally guaranteed, was hindered by limited institutional capacity (UNHCR, 2021).

### 3.1.4 Refugees, asylum seekers, and stateless people: demographic dynamics in Bulgaria.

- 23) Bulgaria's position at the EU's southeastern border makes it a key entry point for mixed movements, receiving asylum seekers mainly from Türkiye and significant numbers of Ukrainian refugees under Temporary Protection (TP). Since the escalation of the war in Ukraine, over 3.3 million Ukrainians have entered Bulgaria, mostly in transit (Government of the Republic of Bulgaria, 2024). By end-2024, around 75,000 remained, 75% of whom were women and children, including 31 UASC (UNHCR, 2024h).
- 24) New asylum claims reached 22,500 in 2023 but fell 45% to 12,250 in 2024 due to reduced arrivals from Türkiye (European Council on Refugees and Exiles (ECRE)). Furthermore, recognition rates also declined: overall from 66% (2023) to 61% (2024), with refugee status at just 0.7% and subsidiary protection at 60% (UNHCR, 2024b). Syrians (62% of applicants) and Afghans (16%) remained the top nationalities, though since December 2024 the State Agency for Refugees (SAR) suspended temporarily Syrian case processing, resuming in early 2025 on an individual basis (European Council on Refugees and Exiles (ECRE), 2024a).
- 25) By December 2024, refugees in Bulgaria were mainly adult men (56%), with over one-third children. Ukrainian refugees, however, were predominantly women and children, with notable shares of older persons and people with disabilities. In 2024, Bulgaria registered 2,601 UASC—mostly boys aged 16–17—making it one of the top EU countries for such arrivals, although most transited onward (State Agency for Refugees and Council of Ministers Republic of Bulgaria, 2024). Regarding stateless individuals in Bulgaria, the 2021 Census recorded 539 individuals as stateless, 764 of unspecified citizenship, and some 50,000 undocumented Roma at risk (UNHCR, 2025a).

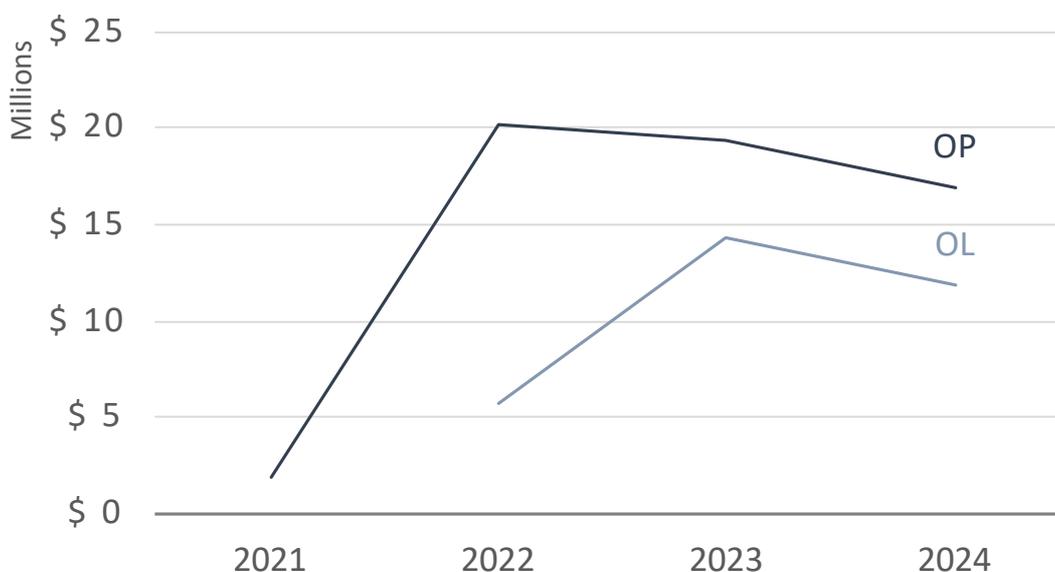
## 3.2 Overview of UNHCR's operations in Bulgaria

- 26) UNHCR has operated in Bulgaria since 1993 and significantly expanded its presence in 2022 in response to displacement from Ukraine, shifting from a primarily advocacy role to direct assistance, protection, and solutions. Operating from the CO in Sofia, it covers borders, transit, and reception areas through partners and field visits. UNHCR Bulgaria strategies evolved from interim plans in 2022–2023—focused on compliance with EU and international standards, access to asylum, alternatives to detention, and socio-economic inclusion—to the 2024–2026 multi-year strategy, which adopts a “protection and solutions ecosystem” approach engaging refugee communities, institutions, oversight mechanisms, and wider society. This approach signals a repositioning of UNHCR as a convenor, deploying public advocacy, communications, and alliance-building as key tools. It also places renewed emphasis on Bulgaria's outstanding pledges under the Global Compact on Refugees, particularly those related to statelessness, census inclusion, and the withdrawal of reservations to the 1954 Convention. A new component of UNHCR's multi-year strategy was

the incorporation of potential activities to support the voluntary return to Syria, in accordance with UNHCR’s position on returns to the Syrian Arab Republic (December 2024).

- 27) Programme priorities<sup>21</sup> have encompassed cash assistance, with over 10,000 Ukrainians receiving support in 2024<sup>22</sup> safe spaces have been established, including five Blue Dots that have served more than 84,000 individuals (UNHCR, 2022f, 2022d, 2023g). Furthermore, community-based protection has been strengthened through Compass Centres located in six cities, while inclusion measures have facilitated training, mentorship, and job placements for upwards of 9,000 refugees. Notably, the heightened emphasis on economic inclusion within UNHCR’s strategy—such as the launch of the Refugee Employment Platform in 2024—reflects both evolving trends and the prevailing intention among Ukrainian refugees to remain in Bulgaria and access livelihood opportunities, as indicated by the (UNHCR, MSNA 2022-2023).
- 28) In terms of resources, budget cuts implemented during the first half of 2025 prompted a thorough review of both UNHCR Bulgaria’s 2024–2026 multi-year strategy and the structure of the country office. Although the downward trend in available funding for the operation had already been identified in 2024 (see Figure 1 below), the severity of the 2025 cuts<sup>23</sup> necessitated a significant reduction in the country presence—resulting in decreased operational capacity and a narrowed programme focus.
- 29) UNHCR’s needs-based budget (OP)<sup>24</sup> in Bulgaria experienced a rapid increase from 2022, in line with the higher refugee numbers and emerging protection needs; however, since 2023, it has shown a declining trend. The OP budget for 2024 is set at USD 16.9 million, marking a 15.9% decrease of needs from 2022. Whereas in 2022, only 29% of the required funds had been released to the operation, in 2023 and 2024, the average available funds (OL) were 72% of estimated needs (see Figure 3 below).

**Figure 1. OP and OL Budget (in million USD) 2022 to 2024**



Source: Results Data Portal Budget Download 4.6.1 (2022-2023); For OP 2021: UNHCR Focus data.

- 30) In 2022 and 2023, given the available funds (OL), UNHCR’s operation in Bulgaria mainly focused on supporting border and protection monitoring, documentation, and digital access to services (outcome area 1 – OA1), as well as providing immediate assistance through cash assistance and non-cash items (outcome area 8 – OA8), which outlines OL according to UNHCR’s global OAs. In 2024, resources increased in the Community, Livelihood, and Integrate OAs, and a new OA 4 was introduced to operationalise GBV prevention and risk mitigation (see Figure 2 below).

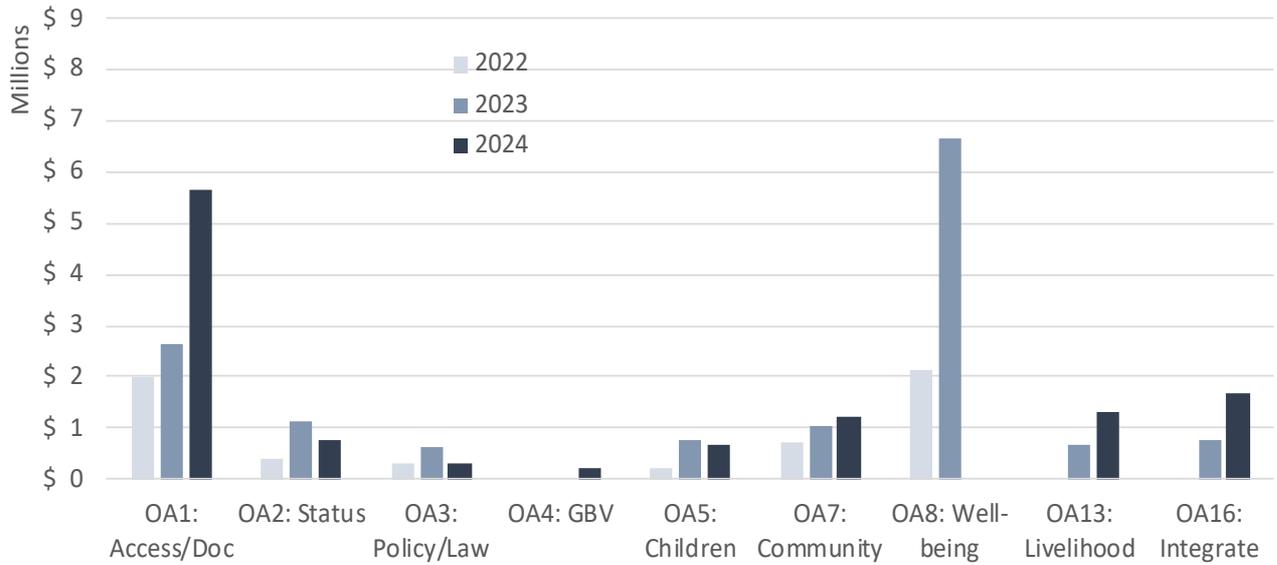
<sup>21</sup> In line with the priority areas of enquiry defined in the Terms of Reference of the evaluation.

<sup>22</sup> CBI focal point data - Scoping interview.

<sup>23</sup> Out of the temporal scope of the evaluation.

<sup>24</sup> See definition in Reading notes.

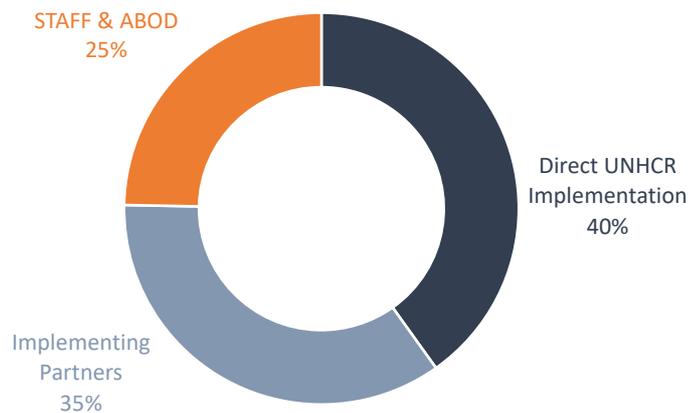
**Figure 2. Available funds (OL) across OAs (2022-2024)**



Source: UNHCR Results Data Portal Budget Download 4.6.1 (2022-2024).

31) In 2024, the operation has relied on seven partners (down from nine in 2023) to support the implementation of its programme, which accounted for 35% of the available funds (OL) during the evaluated period (see Figure 3 below). Of the remaining funds, 40% were allocated to direct implementation and 25% to administration (ABOD) and staff costs.

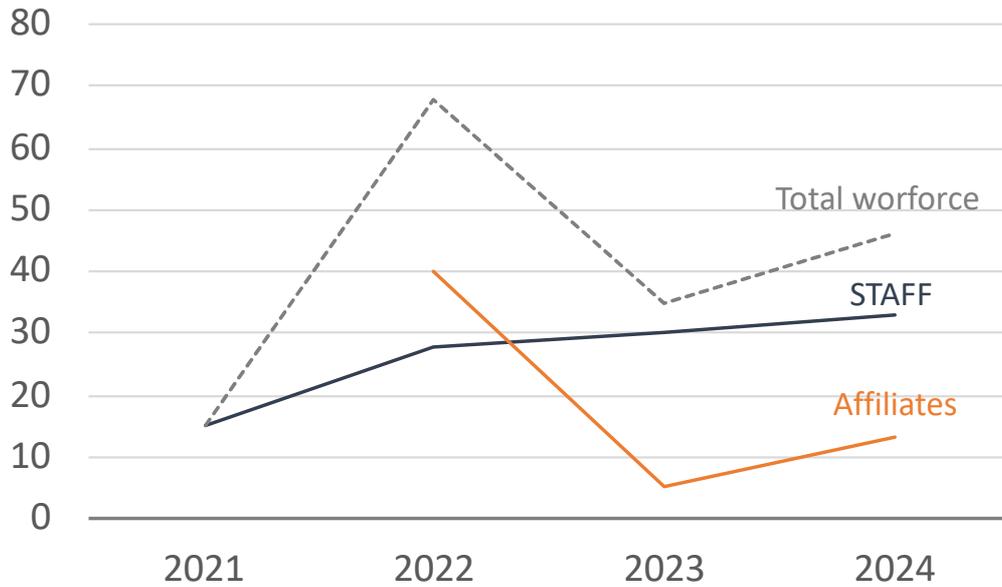
**Figure 3. Distribution of available funds (OL) by type of implementation (UNHCR and funded partners) and staff and administration costs (2022-2024)**



Source: UNHCR Results Data Portal Budget Download 4.6.1 (2022-2024).

32) Between 2021 and 2024, the workforce in Bulgaria grew by 207%, reaching a peak of 307% in the second half of 2022 (see Figure 4 below), and afterwards declining again.

**Figure 4. UNHCR Bulgaria CO workforces - 2021-2024**



Source: Workforce BG\_22-24 (ver. 13.02.2025), Staff List-Master Sheet\_2021-2024

### 3.2.1 Impact of the new United States of America (USA) administration

- 33) The new USA administration's policy changes have created uncertainty and required UNHCR Bulgaria to adapt its programming and budgets. While not the main focus of the evaluation, the report considers how shifts in USA's foreign policy could affect UNHCR activities and recommendations in Bulgaria.

## 4 EVALUATION FINDINGS

### 4.1 UNHCR's strategy and adaptation to the needs of forcibly displaced and stateless persons

KEQ1: How strategically has UNHCR been positioned within Bulgaria, given the needs of refugees, asylum seekers, and stateless persons and the national and regional context? (Coherence and Relevance)

34) In the beginning of the 2022–2024 period, UNHCR's strategic positioning in Bulgaria was characterised by a shift from a primarily advocacy-focused approach to one more actively engaged in operational delivery and institutional support, first during the emergency response phase, and later through initial efforts aimed at socio-economic inclusion. Its strategy was broadly aligned with Bulgaria's response to the Ukrainian influx and with regional frameworks, while alignment with EU institutions further consolidated UNHCR's positioning as a trusted protection actor. This strategic transition was shaped by the arrival of persons fleeing Ukraine, which necessitated the expansion of activities related to temporary protection, municipal support, and civil society engagement. UNHCR drew on its technical capacities and partnerships to support emerging coordination mechanisms and offer protection-sensitive guidance within national policy dialogues, while also maintaining a low-profile diplomatic approach with key government institutions and at the EU external borders.

35) UNHCR and partners developed a solid evidence base through multiple data generation exercises, which informed programming and proved valuable to the organisation's positioning and stakeholders' planning. Yet some gaps were identified in translating evidence into strategy and advocacy. Needs in health, housing, and UASC protection were only partially reflected in the country strategy. Data generation and AGD efforts were instrumental in documenting the evolution of needs, but implementation remained partial (e.g. children's needs, disability).

36) Programme reach and visibility expanded in some areas, but UNHCR's engagement remained concentrated on certain population profiles and entry points into the national system. While contributions to asylum access, legal aid, and child protection were recognised by institutional partners, sustained engagement on statelessness, gender-based violence, and the inclusion of non-Ukrainian asylum seekers was more fragmented. UNHCR's capacity, high-level mobilisation and positioning to anticipate and influence longer-term integration frameworks were constrained by institutional changes driven by political instability, limited political will on integration policy, and the absence of a single coordinating authority across multiple public administrations.

SQ1.1. To what extent has UNHCR's strategic positioning in the country effectively identified and addressed the needs of asylum seekers, refugees and stateless persons in Bulgaria, taking into account the changing context.

**UNHCR's role in the country rapidly expanded in 2022, transitioning from a primarily advocacy-oriented office into a fully operational presence delivering assistance, protection and solutions for thousands of refugees. The Ukrainian refugees' influx reshaped the country's context, introducing new and large-scale needs among forcibly displaced populations.** To strengthen its positioning at the country level, UNHCR consistently advocated for integration and key protection priorities—such as statelessness—and mobilised high-level visits from headquarters<sup>25</sup> to influence policymakers and key national institutions, with the aim of advancing relevant legal frameworks and public policies. UNHCR's strategic positioning was shaped by the evolving needs as well as the broader protection and coordination challenges posed by the Ukraine Refugee Situation. UNHCR and its partners, including other UN agencies,

<sup>25</sup> Reported by UNHCR at the time of writing.

mobilised their response guided by the RRP, first launched in 2022 (UNHCR, 2022a)<sup>26</sup>, with a dedicated Bulgarian chapter in 2023, to coordinate support for refugees fleeing the conflict in Ukraine. In its third year, the 2024 RRP focused on providing practical and specialised support from RRP partners to host countries, ensuring refugees have effective access to legal status and rights, targeted assistance, enhanced self-reliance, and socio-economic inclusion, while fostering social cohesion between refugees and host communities.

37) **UNHCR's positioning in Bulgaria has transitioned from an emergency response to one focused on inclusion, reflecting the evolving needs of the Ukrainian population settled in the country. Despite efforts to document the needs of all forcibly displaced and stateless persons, including vulnerable populations, UNHCR's strategy has not consistently ensured proportional support across different groups.** Emerging needs were assessed and integrated into programming, supporting the shift from emergency response to longer-term socio-economic inclusion. This is particularly evident in the Ukrainian refugee crisis, where UNHCR progressively shifted its focus from immediate assistance (such as legal status, information provision, and material aid) to support for livelihoods, access to state social protection, and community mobilisation.<sup>27</sup> This shift has been implemented through the transition from *Blue Dots* to *Compass Centres*,<sup>28</sup> the expansion of CBI (see SQ 3.4), and the development of municipal partnerships. However, UNHCR's support provided for different groups of forcibly displaced and stateless persons was uneven, partly due to earmarked funding. Although the *Compass Centres* were initially intended to serve all forcibly displaced and stateless persons, in practise the centres have been predominantly accessed by Ukrainian Temporary Protection Beneficiaries (TPB), reflecting their majority representation within the displaced population in Bulgaria, but also the operational readiness to provide services to all groups of people. Similarly, the CBI programme, designed for all forcibly displaced and stateless persons, has primarily benefited TPB. Looking ahead, UNHCR's decision to adjust the presence of funded partners in detention and registration-reception centres in 2025 appears intended to improve service quality and coordination among partners, while reinforcing support to the *Compass Centres*. This shift is understood to align with the planned roll-out of the one-refugee approach and the opening of a new *Compass Centre* in Harmanli in 2025, expected to expand access to services, advocacy and coordination mechanism for refugees of all nationalities. However, according to several stakeholders interviewed during the evaluation, this uneven support also contributed to a reduced focus on key issues for other refugee groups in 2024, underscoring the continued need to ensure attention to their specific protection needs and challenges.

38) **Within the context of Bulgaria as an EU external border and considering increased arrivals following the Ukraine situation, UNHCR positioned itself as a key actor in safeguarding access to territory and international protection procedures, and statelessness. However, comparatively less visible attention was given to access to territory along the Turkish-EU border, non-refoulement, the quality of status determination procedures for non-Ukrainian asylum seekers.** Amid increased arrivals following the Ukraine crisis and a record number of asylum seekers from the Global South in 2023, UNHCR's strategic engagement was enabled by formalised legal partnerships, cooperation with border and asylum authorities, and continued participation in national policy dialogues. A central element of this positioning was its role in the tripartite Memorandum of Understanding (MoU) with the General Directorate of Border Police (GDBP) and the Bulgarian Helsinki Committee (BHC), which provided the institutional framework for structured border monitoring, as well as its partnership with the Migration Directorate in monitoring detention and SDP. Through these mechanisms, UNHCR promoted adherence to international protection standards, including non-refoulement, while conducting evidence-based reporting, bilateral interventions, facilitating referrals to asylum procedures, including for unaccompanied and separated children, and participating in

<sup>26</sup> Bulgaria was added to the 2022 regional RRP through a recalibration exercise in 2022 Q4.

<sup>27</sup> In early 2022, UNHCR activated a Level-3 emergency to respond to the Ukraine Situation in the region, including neighbouring countries such as Bulgaria receiving mass influxes of refugees. Under a L3 emergency, UNHCR scales up to address urgent humanitarian needs including by leading the refugee response; deploying emergency teams; responding to protection risks; and delivering life-saving immediate assistance. After the L3 was deactivated at the end of 2022, UNHCR transitioned from an emergency response to regular operations.

<sup>28</sup> In 2022, as part of the emergency response to the Ukraine crisis, UNHCR, UNICEF, and partners established six "Blue Dots" centres in Sofia, Varna, Burgas, Dobrich, and Ruse. These centres provided information on legal issues, psychosocial support, and referrals to other essential services for arriving refugees. In response to changes at both the regional and national levels, as well as the evolving needs of forcibly displaced and stateless person, the Blue Dot model was phased out as of 31 December 2023. Beginning in 2024, it was replaced by a new community-based approach. The *Bulgaria Network of Compass Protection and Inclusion Centres* "Compass Centres", managed by UNHCR's funded partners, now focus on more systematic, group-oriented activities rather than individual service provision, with the aim of promoting social and economic inclusion.

inter-agency working groups. In parallel, UNHCR provided technical support to the SAR and conducted capacity-building training for border officials and asylum decision-makers<sup>29</sup>, aiming to align asylum procedures with EU and international standards. Activities included targeted training, operational guidance, and sustained dialogue with national counterparts and EU agencies. However, while significant efforts were made to support the registration and reception of TPB, comparatively less operational and advocacy focus was placed on access to territory along the Turkish-EU border, on non-Ukrainian asylum seekers, and on strengthening the quality and fairness of the RSD process. According to interviews to external stakeholders, key working groups that include the Border Police and the Migration Directorate have not regularly convened since 2022. Data provided by the operation indicates that working group (WG) meetings with both institutions were resumed in 2024. Regarding statelessness, UNHCR has supported several studies in a context where, despite relatively low figures—an estimated average of 1,050 stateless persons at the end of 2024, according to UNHCR’s Data Finder—there are still population groups at risk of statelessness (e.g. Roma people). UNHCR maintained its normative leadership, supported by a Country Agreement with the Government of Bulgaria. Yet, limited political will and the need to redefine inter-agency coordination mechanisms on statelessness since 2022 have hindered progress, despite ongoing technical engagement and capacity-building (refer to EQ 2.3 and OA1) aimed at advancing legislative or procedural improvements in the statelessness determination system.

**SQ1.2. How well aligned and relevant is the existing UNHCR’s 2023 annual strategy and MYS to national and regional priorities and changes in the wider regional and geopolitical context, including developments related to the EU Pact?**

- 39) **UNHCR’s engagement in Bulgaria has facilitated the practical implementation of regional protection frameworks**, including the GCR, the EU’s TPD, the Ukraine Situation RRP, and relevant elements of the EU Pact. In addition to supporting the implementation of the TPD in Bulgaria<sup>30</sup>, UNHCR fulfilled its coordination mandate under the Ukraine Situation RRP by spearheading the development and implementation of the country chapter, working closely with sector leads, government line ministries and local stakeholders. UNHCR mobilised humanitarian and UN partners, including national and refugee-led NGOs, to contribute to a harmonised response aligned with national strategies (as presented in the following sections).
- 40) **UNHCR’s strategic efforts have generally aligned with the Government of Bulgaria national policy in responding to the Ukrainian refugee crisis<sup>31</sup>, while maintaining broader support to asylum-seekers and stateless persons. The operation in Bulgaria remains committed to supporting national institutions, despite the frequent changes in government and shifting political priorities.** Beyond the emergency phase, UNHCR has focused on access to services, including legal assistance, education, and psychosocial support, while also promoting inclusion and integration. This has been achieved through active engagement in inter-agency working groups, regular information exchange, capacity-building initiatives, and technical advice to national counterparts. UNHCR has provided sustained support to national institutions and sectoral ministries, including at the municipal level. For example, it has worked closely with the SAR, the primary authority for registration, status determination, and case management, as well as with the Ministry of Interior, which is responsible for border procedures, residency documentation, and reception arrangements for individuals under temporary protection. UNHCR worked with the Ministry of Labour and Social Policy and the State Agency for Child Protection to support the development of national referral systems—particularly for unaccompanied and separated children—alongside the Agency for Social Assistance, which facilitates access to social benefits. UNHCR also collaborates with the Ministry of Health and the Ministry of Education to ensure access to essential services. UNHCR activities have primarily centred on advocacy for the early identification of forcibly displaced and stateless persons with specific needs and the provision of tailored support. Additionally, UNHCR has contributed to national policy development, aiming to strengthen its strategic engagement in longer-term planning and system-strengthening processes.
- 41) **UNHCR’s alignment with municipal governments has been a key pillar of its strategy to support**

<sup>29</sup> UNHCR supported two workshops for the SAR officers in 2023 concerning the application of Article 1D of the 1951 Convention and IFA; and three workshops in 2024 concerning emotional regulation and interviewing vulnerable applicants, focusing on LGBTIQ+ persons.

<sup>30</sup> Further details can be found in the context section, under the TPD and its implementation in Bulgaria.

<sup>31</sup> Further details can be found in the context section, under the national response to the Ukraine crisis.

**local integration, given municipalities' legal responsibilities for social services and potential role in shaping inclusive policies.** UNHCR established formal partnerships (in the form of MoU) with six major municipalities (Sofia, Plovdiv, Varna, Burgas, Ruse, and Blagoevgrad), facilitating cooperation in areas such as housing, education, employment, and access to social services. Initially, the engagement focused on frontline municipalities responding to the Ukraine crisis (e.g. Ruse, Varna, and Burgas), later expanding to areas with larger refugee populations, such as Sofia and Plovdiv. UNHCR supported municipal efforts by co-implementing and initiating joint projects (*Blue Dots* and *Compass Centres*); however, while municipalities were engaged in the design and initial outreach phases, *Compass Centres* remain NGO-run and externally funded, with varying levels of engagement at municipal level, which undermines service sustainability, prospects for full integration, and institutional ownership. To date, UNHCR's municipal alignment has successfully fostered collaboration and piloted inclusive practices, with Varna and Plovdiv municipalities increasing their participation in local coordination and information provision, but it has yet to translate into structural change or the full integration of refugee services within municipal systems.

- 42) **UNHCR's engagement with other UN entities has demonstrated both operational complementarity and, at times, challenges stemming from overlaps in institutional mandates and programming.** Joint initiatives with UNICEF, the International Organisation for Migration (IOM), and the World Health Organisation (WHO) - including child protection, UASC safe zones,<sup>32</sup> and health - have highlighted the benefits of interagency coordination (as detailed below in SQ 2.1). At the same time, occasional misalignments have arisen due to overlapping activities and parallel programming in areas where UNHCR holds a mandate and technical expertise, such as asylum procedures while differences in institutional mandates and operational approaches, sometimes shaped by varying levels of access to resources rather than expertise and mandate, have resulted in diverging modalities of engagement. In this context, UNHCR has adopted a pragmatic approach, prioritising technical leadership and quiet diplomacy over visibility, and constructively engaging with partners and national authorities to resolve sensitive issues. Opportunities remain for clearer role delineation among UN agencies at the regional level, which could have enhanced coherence, reduced friction, and strengthened joint efforts, particularly in politically sensitive EU external border contexts.
- 43) **UNHCR maintained strategic alignment with EU institutions and reinforced protection standards.** As Bulgaria has advanced its EU integration goals, including its entry into the Schengen Area and the Eurozone, UNHCR's strategy has remained aligned with key EU agencies and directives. UNHCR has played an important role in promoting protection-sensitive approaches within Bulgaria's evolving asylum and border governance. Its engagement with EU institutions and agencies has positioned it as a trusted expert on asylum and international protection. Amid a growing emphasis on security and border control, particularly in the context of implementing the EU Pact, UNHCR's efforts have focused on reinforcing international protection standards and safeguarding the rights of asylum-seekers, while constructively engaging with national and EU actors to influence policy and practice.
- 44) **UNHCR's collaboration with Bulgarian civil society reflected a strong operational alignment, although at times it was constrained by strategic and resource-related limitations.** While UNHCR developed synergies with civil society, particularly funded partners and guided by MoUs, some rapid shifts in funding support, including reduced focus on detention monitoring, presence in registration-reception centres, social services for refugees, and advocacy for stateless people's rights, placed pressure on partner organisations. These partners were often unable to fill the resulting gaps at short notice and sustain essential activities without the additional support., even if UNHCR provided support for resource mobilisation via other funding streams. During interviews, several civil society actors have also expressed the need for more visible engagement from UNHCR in policy dialogue with the government, particularly around the implementation of EU asylum frameworks and the EU Pact. They highlighted the value of UNHCR's leadership in anticipating government actions, shaping policy direction, and advocating for protection standards during ongoing legislative and procedural reforms.

---

<sup>32</sup> UNHCR supports children in the safe zones through legal assistance, information provision and increasingly MHPSS. While there are not existing joint programmes in the safe zones, UNHCR advocates for alternative care, supported expansion of alternative care, and social care capacity in 2023-24. Therefore, as far as child protection in RRCs is concerned, joint initiatives with UNICEF concern alternative care.

## UNHCR's strategies alignment with the EU Migration and Asylum Pact (MAP)/National Implementation Plan (2024-2026)

- 45) **While the EU Pact takes a security-centred approach<sup>33</sup>, UNHCR's strategic priorities remain broadly aligned with its core objectives, particularly in ensuring access to asylum procedures, a protection-sensitive environment, and procedural fairness for forcibly displaced and stateless persons.** The EU Pact formally affirms UNHCR's supervisory role, its right to visit and monitor asylum-seekers at borders (European Parliament, 2024)<sup>34</sup> in the reception centres and in detention, matching its 1951 Convention mandate. Bulgaria's National Implementation Plan<sup>35</sup> further acknowledges UNHCR's technical expertise and envisages its role in the future independent national monitoring mechanism, reinforcing synergies with UNHCR's strategic priorities. However, shifting political dynamics in Bulgaria have constrained opportunities for sustained policy engagement. In this context, UNHCR in Bulgaria has maintained a focus on technical-level advocacy, at times low-key. Some key informants perceived a missed opportunity for more visible leadership and broader advocacy to counterbalance the dominant security narrative and promote refugee protection within Bulgaria's migration governance via active involvement of funded partners and civil society in advocacy efforts, legal reform drafting and implementation planning.

SQ1.3. To what extent has programme design and implementation been informed by evidence that captures the needs of refugees, asylum seekers and stateless persons, and the priorities of the government?

### *Use of evidence-based tools to assess the needs*

- 46) **UNHCR has generated a strong evidence base to identify the needs of refugees, asylum seekers, and stateless persons in Bulgaria, but gaps persist in translating this evidence into coherent strategies and programmes.** UNHCR and its partners have made significant contributions to data generation, producing a broad evidence base on the needs of forcibly displaced and stateless persons. Between 2022 and 2024, methodologies such as the AGD participatory assessments, Multi-Sector Needs Assessments (MSNAs 2022, 2023) for Ukrainian refugees, the statelessness mapping survey by the Foundation for Access to Rights (FAR), and the 2024 Socio-Economic Insights Survey (SEIS) provided detailed insights into vulnerabilities and access to services.<sup>36,37,38</sup> Additional sources include data collected by funded partners, such as RSD monitoring, court hearings, litigation case studies, and enrolment for cash assistance. The BHC, for example, identifies UASC, tracks court proceedings, and provides legal aid. In terms of CBI, UNHCR and the Bulgaria Red Cross (BRC) conducted structured interviews and Focus Group Discussions (FGDs) to determine eligibility for cash assistance and assess preferences, as mentioned in SQ 3.4. This data is used for operational design, legal assistance, and targeting within the cash assistance programme, although vulnerability criteria are limited (no advanced vulnerability scoring tools or systematic review mechanisms). Data informed UNHCR's programming and proved valuable to external stakeholders,

<sup>33</sup> The EU Pact introduces an integrated framework that combines migration management with protection responsibilities. However, the strong emphasis on mandatory border procedures, the legal fiction of non-entry, accelerated asylum processing, detention and returns measures underscores the need for robust safeguards to ensure these practices remain compatible with international protection principles. Numerous European organisations and publications, including the European Parliament, have adopted critical positions on the EU Pact, highlighting numerous gaps and risks in terms of international protection. See, for example:

- European Parliament Briefing. Legal fiction of non-entry in EU asylum policy. European Parliamentary Research Service. April 2024.
- ECRE Commentary: An Analysis of the Fiction of Non-entry as Appears in the Screening Regulation. 2022.
- Apatzidou, Vasiliki (2025) Bordering Asylum: Examining the EU's Border Procedures under the Asylum Procedures Regulation (EU) 2024/1348. International Journal of Refugee Law. <https://doi.org/10.1093/ijrl/eeaf014>.
- Meijers Committee (2024) EU Migration Update 3/2024 Political developments in European migration policy.
- Press release. UNHCR calls on EU to ensure Asylum Pact is implemented with protection at its core, 2024.
- Press release. UNHCR calls for stronger safeguards in EU proposal on asylum transfers to third countries, 2025.

<sup>34</sup> Regulation (EU) 2024/1348 of the European Parliament and of the Council of 14 May 2024 establishing a common procedure for international protection in the Union and repealing Directive 2013/32/EU Article 6 The role of the United Nations High Commissioner for Refugees

<sup>35</sup> Refer to the Operational Context section for further details on the EU Migration and Asylum Pact and the National Implementation Plan.

<sup>36</sup> These data collection exercises include: AGD Participatory Assessment Annual reports (UNHCR, 2023l, 2023m); Refugee Status Determination Procedure Annual Monitoring reports (UNHCR, 2022c, 2023a) Protection Monitoring findings (UNHCR, 2022b) Annual Border Monitoring report (UNHCR, 2023a, 2024f) , Cash Assistance for Basic Needs, Participatory Assessment of Refugee Vulnerabilities and Needs in Bulgaria (UNHCR, 2024c), Post Distribution Monitoring of Cash-Based interventions (UNHCR, 2023f, 2024g, 2025f) Multisector Needs Assessment (Regional Refugee Response for Ukraine Situation, 2023), Socio-economic Insights Surveys (SEIS) (UNHCR and Regional Refugee Response for Ukraine Situation, 2024).

<sup>37</sup> As part of the AGD Participatory Assessment Annual reports (2022, 2023 and 2024), the following activities were conducted: 21 FGDs with more than 300 refugees and asylum-seekers conducted in 2022; 21 FGDs with 177 refugees conducted in 2023; 11 FGDs were conducted with around 121 asylum-seekers and refugee children in 2024.

<sup>38</sup> FAR conducted a statelessness mapping survey, interviewing around 30 stateless people in Bulgaria. The draft report, which provides practical insights and highlights key issues faced by stateless people, is still under review.

including government institutions, national statistical bodies, and civil society, for planning and analysis. For instance, the SEIS is validated annually by the National Statistical Institute and contributes to the RRP. Compass Centres also serve as a channel for collecting community-level feedback and monitoring service access, reinforcing accountability to affected populations (AAP).

47) Despite this strong evidence base, some needs highlighted across priority areas—such as health, education, and accommodation<sup>39</sup>—are only partially reflected in country strategies (2022, 2023, 2024–2026), and not framed as dedicated outcomes, which reduces their visibility and prioritisation.<sup>40</sup> UNHCR’s strategies did not fully incorporate the needs in the areas mentioned above into its advocacy plans with governments, since they were primarily the responsibility of national authorities (OIOS and UNHCR, 2023). For example, the 2023 AGD Report documented children’s urgent concerns about access to healthcare and medication in reception centres, yet these issues were not systematically incorporated into UNHCR’s advocacy or programme design. Children also highlighted language barriers and support from professionals in accessing healthcare (UNHCR AGD Report, 2023, Children). These needs are addressed to some extent through monthly reception monitoring, but targeted advocacy efforts could improve access to healthcare services. The 2024–2026 MYS partly addresses this gap, with more systematic plans for advocacy in education and employment, though less emphasis is placed on health and housing. Similarly, although protection briefs and monitoring highlighted the lack of alternative care for UASC (UNHCR Bulgaria protection brief, 2024), programme responses in support of foster care or residential solutions were not implemented. When it comes to best practices, mapping and analysing the capacity and skills of additional NGO/CSOs was lacking (outside of the list of partner organisations who work on inclusion in social protection programmes) to identify skilled organisations to implement UNHCR’s approach. At the programme level, targeting mechanisms (e.g. cash-based interventions) remained without advanced vulnerability scoring tools. Evidence from partners—such as detention monitoring and RSD monitoring—was also not fully embedded into wider programme design or advocacy frameworks. Several factors explain these gaps. UNHCR Bulgaria experienced rapid operational expansion after 2022, combined with high staff turnover, which reduced institutional memory and limited the systematic integration of lessons. Newly formed civil society partners, while valuable, often lacked the institutional capacity for data management and follow-up.<sup>41</sup> Contextual challenges—such as legal restrictions, policy disparities across refugee groups (e.g. unequal access to health insurance), and fluctuating government priorities—further constrained the translation of evidence into sustained advocacy or national policy change.

#### Overall application of UNHCR’s AGD policy

48) **While UNHCR applies an AGD policy across its activities in Bulgaria, challenges remain in fully documenting the needs and priorities of diverse population groups and systematically identifying individuals with specific vulnerabilities.** These limitations hinder the full integration of AGD principles (particularly AGD mainstreaming) into the regular programme cycle. The main tool for data collection within AGD participatory assessments are FGDs with forcibly displaced and stateless people, which remain central to shaping UNHCR’s and partners’ protection and inclusion programmes. These discussions enable direct dialogue between protection actors and forcibly displaced and stateless persons, generating primarily qualitative data that inform programming. However, their group format limits the ability to capture the individual voices and perceptions of persons with specific vulnerabilities. While benefits include the disaggregation of participants by age and gender and dedicated reports for children (2023), concrete activities and support addressing specific vulnerabilities (such as disability, GBV, trafficking) remained limited. This is partly linked to gaps in available data and the challenges of translating identified risks into targeted

<sup>39</sup> As part of the AGD participatory assessment (2023), refugees and asylum seeker identified key needs primarily in the areas of health (mainly, not enough access to medical services, language barriers, and not sufficient general practitioners); education (main barriers to access education highlighted were language barriers, lack of information, and challenges in determining educational needs; and accommodation (mainly high rents, discriminatory attitudes by landowners, language barriers, and lack of information). These findings align with the results of the 2023 Multi-Sector Needs Assessment, which focused exclusively on Ukrainian refugees and indicated that their top needs were healthcare (45%), food (38%), employment (18%), and education (12%).

<sup>40</sup> In the area of health, the 2024–2026 MYS primarily focuses on support for MHPSS. It includes general references to collaboration with the government, WHO, and healthcare institutions to improve access to medical services for refugees and asylum-seekers, along with advocacy for policies that promote equitable and affordable healthcare. Education is mentioned in the context of durable solutions—alongside healthcare, housing, and language classes—but references to primary and secondary education are limited and appear only under the broader umbrella of child protection. Accommodation is included in the MYS only as an indicator, with no clearly defined actions or strategies planned to address this need.

<sup>41</sup> These emerging organisations face multiple challenges in the service delivery, including establishing efficient processes, managing growth, and tailoring services to the specific needs of end users).

programmatic components.<sup>42</sup>

- 49) **Despite growing recognition of the need for inclusive data, and the significant presence of persons with disabilities among Ukrainian refugees, disability information is only partially captured across key protection activities.** On disability, the SEIS collects household-level data, and UNHCR's internal system (proGress) records individual-level disability data for those requiring assistance. However, disability data is not systematically monitored<sup>43</sup> and collected in border monitoring, detention monitoring, or among people with temporary protection, but rather via Regional Protection Monitoring in 2025<sup>44</sup> resulting in a gap during the evaluation period that limited the effective inclusion of persons with disabilities in programming.
- 50) **UNHCR has made progress in strengthening its feedback and complaint mechanisms.** Forcibly displaced and stateless persons have access to UNHCR via email and a QR code-linked Kobo form dedicated to complaints and feedback, enhancing AAP. Recurrent complaints have been reported regarding poor hygiene conditions, the quality of food, and a perceived lack of safety, particularly due to the absence of gender-segregated accommodations, among individuals residing in the Refugee Registration and Reception Centres (RRCs). However, data collected by partners remains uneven, particularly in capturing diverse vulnerabilities. Challenges cited by key informants include inconsistent interview techniques, limited staff capacity to collect accurate data, and concerns over data quality. Key informant interviews also revealed that some partners have conducted regular needs assessments, initially focused on Ukrainian refugees (2022–2023) at UNHCR's request. Over time, some partners proactively expanded these assessments to include non-Ukrainian populations. Regarding CBI registration, UNHCR has provided training on data entry and collection. Additionally, trainings were provided on AGD and participatory assessments, and reliable interview techniques.
- 51) **UNHCR held various internal sessions on Prevention of Sexual Exploitation and Abuse (PSEA) and monitored compliance with mandatory PSEA training.** Internal Integrity SOPs and their respective work plans were introduced in the operation, clarifying internal procedures and mechanisms, and assigning accountabilities. UNHCR has continued supporting partners in reinforcing and strengthening their PSEA organisational capacities. While improvements were noted, collecting reliable data on GBV and other "hidden" protection risks remains a challenge, which was a missed opportunity to link key assistance to unidentified protection needs. Although UNHCR's internal data systems are expected to record age and gender, not all partner reports include this disaggregation. However, according to key informants, since 2024, UNHCR has requested AGD data when it serves a defined analytical purpose in view of partner capacity and the tools that they use.

---

<sup>42</sup> UNHCR's strategic and reporting documents consistently highlight commitments to age, gender and diversity (AGD) inclusion, particularly for women, children, LGBTIQ+ persons, and people with disabilities (BGR Interim Strategy 2022–2023; Bulgaria Multi-Year Strategy 2024–2026). Annual Results Reports (2022–2024) note progress through advocacy, social assistance, and CBI support for households with medical conditions and disabilities, while also acknowledging persistent gaps due to limited vulnerability data, weak national social protection, and the exclusion of asylum seekers and refugees from the mandate of the Agency for Social Assistance. During KIIs it was further confirmed that disability data is not systematically collected in border or detention monitoring, though capacity-building initiatives were piloted in 2024 and regional protection monitoring began including disability disaggregation in 2025.

<sup>43</sup> Annex 3 of UNHCR/AI/2021/01/Rev.3 recommends including organisational markers (including disability) in output indicators where relevant.

<sup>44</sup> The Regional Protection Profiling & Monitoring: Situation of vulnerable refugees from Ukraine (January 2025) is conducted in 11 countries, including Bulgaria.

## 4.2 UNHCR coordination with national, regional and global stakeholders

KEQ2: To what extent has UNHCR been able to promote and benefit from synergies with key stakeholders and to play a catalytic role, mobilising other relevant actors around the cause of refugees, asylum seekers, and stateless persons to maximise the leverage of its interventions? (Coherence)

52) UNHCR's engagement in Bulgaria has reflected an evolving network of partnerships across humanitarian, institutional, and local actors, particularly structured through the RCM and the Ukraine RRP. Inter-agency collaborations demonstrated complementarities in the initial stages of the response, and UNHCR played a key convening role; however, limited role delineation sometimes led to duplication and inefficiencies. Coordination roles shifted rapidly in response to the Ukraine crisis, with UNHCR taking on responsibilities that spanned technical support, resource mobilisation, and inter-agency dialogue. The organisation operated across formal structures—such as national planning processes and sectoral working groups—as well as informal relationships with municipalities, NGOs, and grassroots organisations that emerged during the emergency phase. These interactions varied in duration and formality but collectively expanded the operational footprint of the refugee response.

53) The scope and rhythm of these synergies were shaped by both contextual and organisational factors. In contexts where public institutions had pre-existing mandates or resources, UNHCR functioned primarily as a facilitator and source of technical guidance. In newer or under-resourced thematic areas, its role was more operational and directly supportive. Some partnerships were sustained through regular consultation and joint planning, while others remained transactional or reactive. The emergence of multi-actor platforms also revealed overlapping roles (e.g. child protection, employment services), coordination fatigue or inconsistent representation (e.g. fluctuating engagement and representation in working groups), which influenced the degree to which UNHCR could mobilise others strategically. Due to contextual factors, the transition of leadership in sectoral coordination mechanisms to government counterparts has been limited.

SQ2.1. To what extent are the 2023 Annual Strategy and the MYS coherent and complement the work of other partners (government, development and humanitarian actors, UN agencies, EU entities, private sector<sup>45</sup>, civil society)?

- 54) **UNHCR has played a central role in shaping and sustaining coordination frameworks and mechanisms, yet continued efforts are needed to ensure stronger ownership at both national and subnational levels, as well as structured and inclusive engagement.** In support of the Government's efforts, as part of the RCM, UNHCR, together with sector leads<sup>46</sup>, has convened sectoral working groups (WGs) on legal protection, protection and inclusion, education, cash assistance, and mental health and psychosocial support. These WGs bring together a wide range of actors, government agencies, civil society organisations (including refugee-led groups), and UN and EU agencies, to jointly support the implementation of the RRP for the Ukraine crisis. This coordination framework has enabled stronger technical collaboration, service mapping, and data sharing and serves as a bridge between civil society and the government system, mostly covering refugee issues, while some expand to other forcibly displaced and stateless persons. Nevertheless, sustaining consistent engagement, particularly at senior decision-making levels, remains a challenge across some WGs.
- 55) **Coordination around cross-cutting priorities, such as AAP, community mobilisation and empowerment (especially of women and girls), prevention of GBV, and health continues to require a strengthened focus and structured approaches.** UNHCR maintains close collaboration with key government counterparts, particularly the SAR, by attending monthly coordination meetings focused on

<sup>45</sup> UNHCR's collaboration with the private sector began in 2023 and is still in its early stages. To avoid duplication, analysis of this collaboration is presented in question 3.3 on socio-economic integration.

<sup>46</sup> State Agency for Refugees, UNICEF, Agency for Social Assistance, WHO, and Animus Association Foundation.

asylum conditions and the Ukraine crisis response. Coordination also extends to the Directorate for Migration and includes Tripartite Working Group (TWG) meetings between UNHCR, the BHC, and the Border Police. UNHCR further contributes to relevant working groups related to the implementation of the EU Pact, both Government-led working groups and UNHCR-led coordination meeting. While key stakeholder participation and engagement in some of these fora is limited in scope, these platforms provide important opportunities to share expertise and advocate for refugee protection within national policy discussions. Strategic collaboration is also advanced through bilateral and *ad hoc* meetings with government counterparts, which have proven to be effective channels for promoting key protection priorities, offering technical guidance, and ensuring a neutral and solutions-oriented approach. However, these remain less effective when resources allocations are required. At the local level, coordination with municipalities, as frontline service providers for refugees, although often informal, is strategically supported and structured through MoUs. These agreements aim at ensuring engagement despite changes in local leadership and political transitions. While UNHCR runs *Compass Centres*, these have emerged as key hubs for local coordination, particularly among funded partners as service providers. These remains an opportunity to strengthen joint planning mechanisms (e.g. action workplans) with municipalities to deepen ownership and ensure sustained involvement in refugee service provision and inclusion efforts.

- 56) **The formal joint UN coordination framework and UN planning processes in Bulgaria are embedded in the RCM and the RRP.<sup>47</sup> UNHCR's coordination with other UN agencies in the country, particularly UNICEF, IOM, and WHO, has reflected both strategic alignment and operational challenges, shaped by the evolving nature of the refugee response.** The initial stages of the Ukraine crisis saw effective joint action between UNHCR and UNICEF, including the rapid establishment of the Blue Dots Centres and the co-leadership of the Education Working Group. Both agencies contributed to complementary efforts in education and child protection, including school enrolment drives, language support initiatives, AGD participatory assessments, and proposed amendments to the LAR, particularly regarding the definition of a separated child. These efforts were further reinforced through joint capacity-building initiatives for national stakeholders and complementarity in CBI deployment, in collaboration with the Agency for Social Assistance and in coordination with IOM, UNICEF and IFRC. This collaboration with IOM has focused primarily on joint trainings and initiatives focusing on children, including UASCs, and contingency planning, in coordination also with UNICEF. In the health sector, UNHCR has worked closely with WHO to advocate for the inclusion of refugees in national health systems and the provision of mental health and psychosocial support (MHPSS) through the MHPSS technical working group under the Refugee Coordination Forum. However, as the response evolved, divergences in institutional mandates and working modalities became more visible, particularly in overlapping areas such as child protection in the context of reception of asylum-seeking children and of asylum procedures. This has, at times, led to duplication of efforts, mixed messaging to national authorities and other stakeholders, and inconsistencies in service delivery. Based on numerous interviews with external stakeholders and review of relevant documentation, the transition from Blue Dots, jointly run by UNHCR, UNICEF and BRC) —to UNHCR-led *Compass Centres* was not perceived as fully coordinated with key stakeholders. This contributed to misunderstandings and limited buy-in, which in turn affected the overall coherence and efficiency of the model's implementation.<sup>48</sup> More information below under coordination with partners.
- 57) **Coordination between UNHCR and EU agencies has strategically expanded but remained limited in terms of structured linkages to align national responses with EU protection and integration frameworks.** UNHCR contributed to legal guidance (regional level), data sharing and sought complementary efforts with the EU Asylum Agency (EUAA), Frontex, and the EU Agency for Fundamental Rights (FRA) to support the SAR (e.g. training officials, supporting legal reforms responding to EU infringement procedures, and promoting protection-sensitive practices). While structured and effective collaboration has been

---

<sup>47</sup> Bulgaria does not have a UN Country Team (UNCT). Aside from the Bulgarian chapter of the Refugee Response Plan (RRP), which is led by the UNHCR under the RCM and falls under the regional coordination platform, there are no formal, joint national UN planning processes. (Source: CSE UNHCR Bulgaria Terms of Reference).

<sup>48</sup> The Compass Centre model was developed by UNHCR as an operational response to support the transition from emergency assistance to a more structured provision of services focused on social and economic inclusion. While the model was presented and discussed in multiple coordination meetings, broad consensus among partners was not fully reached. Key areas requiring further alignment included the use of existing partner facilities versus new rented premises, coordination roles and presence among partners, the long-term sustainability of the centres, potential overlaps with existing services and models already operated by partners, and the strategic approach (previously joint initiative with UNICEF), and geographic locations for transitioning out of the Blue Dots framework, among others. These issues have contributed to misalignments and a mixed level of acceptance and buy-in among partners, with some concerns remaining unresolved at the time of this evaluation.

established between UNHCR and FRA and Frontex, further work is needed for the Border Police and Directorate of Migration to systematically apply EU tools (planned to be introduced in UNHCR-FRA-Frontex workshops in October and December 2025).

- 58) **UNHCR Bulgaria focuses on local ownership and capacity-building for civil society organisations has emerged as a foundation of its operational model between 2022 and 2024 and functioned as a “laboratory” for testing models of localisation.** Coordination with civil society and funded partners evolved significantly between 2022 and 2024 as the refugee situation in Bulgaria became more complex and protracted. Historically, UNHCR has supported a small number of long-standing local partners, particularly in the absence of international NGOs. However, the 2022 Ukraine crisis prompted the emergence of new grassroots organisations, including refugee-led, women-led, and community-based organisations. UNHCR supported some of these, helping to strengthen the protection system and enable a more diverse service delivery environment. Interviews data showed limited proactive coordination among funded partners, with a few instances of overlapping services (e.g. provision of employment assistance services) and gaps in the coordination mechanisms with civil society organisations and funded partners resulting in duplication of similar services in the same area (e.g. career development centres in Burgas). While UNHCR often functioned as the central convener, meetings have been described as irregular and driven mainly by internal updates rather than joint planning. In addition, shifting funding priorities created uncertainty among partners and limited opportunities for collective agenda setting, highlighting the need for more stable and participatory coordination mechanisms and longer-term planning frameworks. Yet, partners demonstrated flexible cooperation, rapidly adjusting to changing priorities. More recently, coordination between funded partners and other local organisations beyond the *Compass Centres* remains informal and uneven partly due to the absence of structured coordination mechanisms at the municipal level, limited incentives for collaboration among actors with differing mandates and funding streams, and the externally driven nature of service delivery, which has not been fully embedded in local systems. While the coordination environment continued to face challenges, the foundations established during this period provided valuable lessons for future operations and localisation efforts in the region, according to regional key informants.

SQ2.2. To what extent is UNHCR Bulgaria CO well-positioned to engage with government stakeholders on the EU Migration and Asylum Pact implementation, including on ensuring coherence and the maintenance of protection for refugees, stateless, and asylum seekers in Bulgaria in line with the MYS?

- 59) **UNHCR Bulgaria is well-positioned as a technical and protection advisor to government stakeholders on the EU Pact’s implementation, with demonstrated influence on legal safeguards and policy drafting, but its contribution in this context is limited by insufficient coordination within the broader refugee response framework, particularly through the underutilised RCM.**<sup>49</sup> In 2024, UNHCR has played a consultative role in supporting national efforts to advance the implementation of the EU Pact, which is scheduled for full application by June 2026, by participating in formal working groups established by government authorities. UNHCR -co-chaired together with SAR the Legal Issues Working Group, where it reviewed and provided detailed commentary on the National Implementation Plan. This input helped ensure that provisions related to international and EU standards were adequately reflected, with particular emphasis on legal safeguards for children, protection of stateless persons and mitigation of the risk of statelessness, access to legal assistance, and the establishment of an independent national monitoring mechanism. UNHCR has also developed a set of preliminary comments and observations addressing key protection concerns, many of which were taken into consideration during the drafting process. This engagement reinforced UNHCR’s role as a technical and protection advisor within the national legislative framework around the EU Pact. UNHCR remains committed to sustaining this role into 2025, as legislative changes advance. Despite these positive contributions, some key informants highlighted a lack of deeper coordination within the broader refugee response framework, particularly the RCM, which brings together humanitarian actors and government representatives, and has not yet substantively engaged with the implications of the EU Pact. Although the topic has occasionally appeared on the agenda, there have been no in-depth discussions or joint planning processes through the RCM platform to align response strategies or advocate collectively on key legislative reforms. This gap reflects a missed opportunity for more inclusive dialogue and coherence between humanitarian coordination structures and national policy planning processes. UNHCR’s bilateral engagement with EU stakeholders and civil society actors has helped bridge some of these gaps, particularly

---

<sup>49</sup> It has been debated in other EU countries whether the RCM should be used to include coordination around other nationalities and in this case coordination around EU Pact.

in areas related to legal safeguards and child protection.

SQ2.3. What are the key factors that influence the success of UNHCR's partnerships and coordination efforts with the government, national authorities and other stakeholders, and how well have these been addressed to optimise collaboration and minimise duplication?

60) Table 2 below presents the main factors (internal and external) that have influenced the success of UNHCR's partnership and coordination efforts, including with the government.

**Table 2 Main factors influenced the success of UNHCR's partnership and coordination efforts**

Internal Factors	External factors
<p><b>Funded partners:</b> UNHCR Bulgaria has fostered a diverse partnership model by supporting both established civil society organisations and emerging grassroots actors (including refugee-led groups) and invested in their capacity, which has enabled expanded, locally grounded service delivery in key areas such as protection, legal aid, and socio-economic inclusion. UNHCR's relationship with its funded partners at times resembled that of a donor–recipient dynamic rather than a collaborative partnership.</p> <p><b>The recent surge of new local actors (some lacking institutional memory or humanitarian experience) required significant investment from UNHCR in capacity-building.</b> There were concerns about inconsistent communication, limited space for negotiation, and insufficient dialogue.</p> <p><b>Socio-economic inclusion:</b> While private sector partnerships were initiated (e.g. chambers of commerce, employment platforms, job fairs), engagement has lacked consistent follow-up, structure, and clarity of mutual benefit, which requires long-term planning and investment, and dedicated resources and evidence, some of which are being put in place.</p> <p><b>Internal structure:</b> High staff turnover, siloed project-based structures, and limited technical capacity—exacerbated by key staff absences—have weakened institutional memory and hindered coordination within the CO (as explained also under KEQ 4).</p>	<p><b>Political and policy environment:</b> Frequent cabinet changes, coalition shifts, and polarised refugee debates have hindered sustained government engagement, legislative progress, and long-term coordination. Schengen accession pressures and the new EU Pact have prompted restrictive legal practices (accelerated procedures, tighter family-reunification), while also opened new streams of funds (EU) for the government and convened multi-stakeholder working groups (UNHCR, 2023a).</p> <p><b>Institutional and operational capacity at national and sub-national level:</b> Low public-service pay scales, limited experience in refugee coordination, and insufficient political will meant that authorities often needed intensive engagement and facilitation support training, coaching, and incentives (e.g. data access, funding support) to co-chair and sustain government involvement coordination structures.</p> <p><b>Multi-stakeholder engagement and coordination:</b> Rising mixed movements have driven deeper collaboration with UN agencies, Frontex and regional UNHCR offices; meanwhile, the surge of new local actors, plus private-sector and academic partnerships, requires robust communication, clear leadership and ongoing capacity-building to translate high-level agreements into effective on-the-ground action (UNHCR, 2023a).</p> <p><b>Inter-agency coordination:</b> While working groups are active, alignment of strategies and implementation between key stakeholders (UNHCR, UNICEF, IOM, WHO, and national institutions) remains uneven.</p>

### 4.3 Effectiveness of UNHCR's programmes in Bulgaria

KEQ3: To what extent and quality has UNHCR achieved and contributed to the envisioned results? (protection environment, protection, CBI, inclusion, social-economic integration) (Effectiveness)

61) UNHCR advanced a broad portfolio of activities—ranging from protection and legal aid to child and community services, cash assistance, and inclusion—that together helped safeguard protection space. Advocacy and technical leadership supported rights-compliant asylum procedures, legal safeguards, and access to documentation, while litigation and training strengthened institutional capacity. Yet, external factors such as pushbacks, unequal support of non-Ukrainian asylum seekers, and gaps in RSD and SDP limited broader impact. The organisation adapted its role and delivery models in response to both emergency needs and pre-existing gaps, aligning with national systems when feasible and stepping in where institutional coverage was weak. Legal advocacy, municipal support, and CBI expansion emerged as key modalities.

62) UNHCR's support contributed to shaping different dimensions of the protection landscape, while also generating entry points for other actors to engage with refugee inclusion. CBI provided timely relief for short-term needs but had limited impact on broader protection outcomes and only partially functioned as an entry point to national social protection, as it was not originally designed for these purposes. The Compass Centre model fostered inclusion and local partnerships, though usage remained concentrated among the Ukrainian population. Socio-economic integration remained fragile, constrained by underdeveloped private-sector collaborations, the absence of a state-led integration framework, and reliance on donor-funded NGO service delivery.

63) Programmatic adaptations varied by domain: in some cases, legal pathways and service access improved; in others, coverage remained partial or focused on specific nationalities. Factors such as delivery timelines, municipal capacity, and partnership frameworks influenced how and where outcomes could materialise. From the programmatic perspective, the period was marked by differentiated responses—shaped by the evolving context, political instability, limited national and local ownership, uncertainty in funding, and institutional proximity.

SQ.3.1. To what extent has UNHCR's policy advocacy contributed to shaping a favourable protection environment for refugees, asylum seekers, and stateless persons in Bulgaria?

- 64) **UNHCR has fostered a more favourable protection environment in Bulgaria by strengthening rights-compliant asylum procedures, promoting legal safeguards, supporting refugee integration and challenging harmful public narratives. However, external institutional and legal constraints and unequal support—particularly of non-Ukrainian asylum seekers—limit broader protection gains.** UNHCR approach is effective in challenging harmful narratives, such as the notion of Bulgaria as merely a transit country and negative perceptions around forcibly displaced and stateless persons, using data to demonstrate refugees' intentions to stay and integrate when given access to education, healthcare, and employment. UNHCR builds the capacity of national institutions by providing training and expertise to ensure rights-compliant asylum procedures. It advocates for inclusive policies, supports socioeconomic integration through partnerships with municipalities and the private sector, and counters public prejudice via awareness campaigns. UNHCR also promotes legal access and accountability by advocating for independent border monitoring mechanisms and addressing legal gaps, including those related to statelessness. UNHCR's strategic positioning, collaborative approach—including coordination and complementarity with EU institutions—and technical leadership have been key to preserving -protection space in a complex institutional and social context, while advancing protection outcomes despite an increasingly underfunded environment. Nevertheless, challenges remain, particularly for non-Ukrainian asylum seekers.

### SQ 3.2. How effectively has UNHCR achieved its intended results in the areas of protection?

#### *Outcome Area 1: Access to territory, registration and documentation*

- 65) **While UNHCR has achieved operational and normative progress in certain aspects of access to territory and documentation, results have been uneven across population groups and constrained by limited engagement in key mechanisms, as well as ongoing border practices.** UNHCR has contributed meaningfully to strengthening access to territory in Bulgaria, particularly through its strategic engagement in border monitoring, capacity-building of national authorities, and legal and policy advocacy. Notable achievements include support for litigation efforts,<sup>50</sup> the training of over 300 border and police officers through the Ministry of Interior Academy, and the facilitation of structured monitoring visits conducted by partners (488 visits in 2023 and 600 visits in 2024) (UNHCR, 2023c, 2024a), targeting practices at key entry points. The 2024 MoU with the Migration Directorate provides full access for UNHCR and its personnel and funded partners to institutions and procedures, as well as coordination and regular exchanges on issues related to migration and asylum detention,<sup>51</sup> including access to all newly detained individuals in detention centres (UNHCR Bulgaria, 2024).
- 66) **UNHCR's participation in the TWG<sup>52</sup> has provided an institutional platform for monitoring access to territory, with regular visits and reporting designed to identify and address violations.** However, stakeholders noted a reduction in UNHCR's engagement within this framework partially caused by poor engagement from key stakeholders. Despite UNHCR Bulgaria's participation in the Regional Protection Monitoring throughout 2024 and the publication of the annual border monitoring report for that year<sup>53</sup>, there were only two TWG meetings held in 2024.<sup>54</sup> Combined with interview evidence, the latter suggests reduced interaction, more discreet channels of engagement, and less consistent participation in monitoring and RSD coordination (see next section and ESQ 2 for further info). This has affected the perceived continuity and visibility of UNHCR's role in this area, according to key informants. Overall, access to territory remains a challenging area in Bulgaria. The country has adopted divergent approaches to different population groups, facilitating entry and documentation for people fleeing Ukraine under the Temporary Protection regime, while access for asylum seekers from other regions (Global South) has been more constrained. Reported pushbacks at the Bulgarian-Turkish border rose significantly in 2023, with over 174,000 individual incidents<sup>55</sup>, before decreasing in 2024 (UNHCR, 2023c, 2024a).<sup>56</sup> While this decline is a positive signal, pushback practices remain a concern (Asylum Information Database - AIDA, 2023b). As a result, access to fair and efficient asylum procedures remains uneven and UNHCR's advocacy on this issue has been viewed by key informants as insufficiently robust, especially in the context of persistent violations and limited accountability mechanisms. This was mainly due to some advocacy efforts remaining low-key were therefore not shared with a wider audience. UNHCR has also contributed to the national consultation process for establishing an independent national monitoring mechanism under the EU Pact; however, this initiative is still under development (UNHCR, 2024k). Furthermore, UNHCR's revised training activities for Border Police personnel that previously had shown positive outcomes<sup>57</sup> due to shifts in priorities and funding constraints, which has raised concerns about sustained institutional collaboration.

<sup>50</sup> Despite survivor reluctance and limited national investigations, strategic litigation cases were initiated with UNHCR support at national level and at European Convention on Human Rights against pushback practices. Annual report 2023 and key informant interviews.

<sup>51</sup> In 2024 UNHCR undertook a total of three monitoring visits: closed facility by the SAR on 05.06.2024, in detention centre Busmantsi on 07.05.2024, and in detention centre Liubimets on 15.05.2024.

<sup>52</sup> UNHCR, the General Directorate Border Police, and the BHC.

<sup>53</sup> The Protection Brief is dated May 2025 and available in English only. It does involve access to territory issues; however, its contents are broader and cannot replace the annual border monitoring report.

<sup>54</sup> Available documentation indicates limited evidence of monitoring and participation in relevant Working Groups in 2022 (one monitoring file and a single weekly report; no annual report found). In 2023, activity included one TWG meeting (26 October) and an Annual Border Monitoring Report. In 2024, engagement resumed but with fewer analytical outputs (two TWG visits, two meetings with the Migration Directorate, one monitoring visit, and the annual report). The RSD annual reports prepared by BHC for 2022 and 2023 were nearly identical, making progress difficult to assess.

<sup>55</sup> The number refers to pushback incidents; with the possibility that one person may be involved in more than one incident and that a single incident may affect a cumulative number of individuals.

<sup>56</sup> Incidents rising from 5,300 in 2022 to 9,897 in 2023, affecting over 174,000 individuals (increased violations correspond to increased numbers of arrivals). Reported incidents dropped to 3,500 in 2024 affecting 43,000 individuals, according to UNHCR 2024 Annual Results Report.

<sup>57</sup> Trainings are assessed as particularly beneficial on part of authorities and they particularly contribute to improved practices, such as reducing average detention time after asylum application to 4–5 working days and lowering irregular entry convictions from 5.5% (2022) to 0.3% (2024).

## Outcome Area 2: Status Determination

- 67) **UNHCR and its partners have made significant contributions to strengthening access to asylum and status determination procedures in Bulgaria through sustained efforts in legal assistance, capacity-building, and strategic advocacy. Nonetheless, challenges persist in ensuring equitable and consistent access to fair and efficient status determination for both refugees and stateless persons.** In 2023–2024, UNHCR and its partners maintained regular engagement with the asylum system, providing legal assistance to both Ukrainian and non-Ukrainian applicants through *Blue Dots* (until their closure in 2023), *Compass Centres*, and in reception facilities. The CO conducted monitoring of the asylum process (including asylum interviews, decisions by the SAR, and court hearings on appeal), and produced annual and thematic reports with findings and targeted recommendations.<sup>58</sup> UNHCR has enhanced the quality of asylum decisions and statelessness procedures by training caseworkers and legal advisors, sharing legal resources, and supporting lawyers representing unaccompanied children.<sup>59</sup> These efforts have enhanced institutional engagement, improved procedural safeguards, and expanded legal support to both asylum seekers and stateless individuals.
- 68) **UNHCR has been effective in documenting the needs of forcibly displaced and stateless persons in accessing the RSD procedure in Bulgaria.** However, UNHCR’s repeated annual recommendations suggest that its capacity to influence structural change is constrained by an institutional stance that could permit the use of practices that hinder access to RSD. Despite improvements in several procedural safeguards, RSD reports from 2021, 2022 and 2023 reported the practice of rejecting individuals who voluntarily present themselves at Refugee Reception Centres (RRCs) to seek international protection, notifying local police who subsequently detain them and transfer them to Special Homes for Temporary Accommodation of Foreigners (SHTAF). Although its frequency has declined during the evaluation period, it persists: 196 cases of rejection in 2021, 94 in 2022, and 48 in 2023. The number of applicants forced to resubmit asylum claims from detention rose again to 83 in 2024 (UNHCR, 2024j).<sup>60</sup>
- 69) **Structural constraints and high application volumes continue to pose barriers to the effective realisation of international protection, particularly for non-Ukrainian asylum seekers.** Border authorities often failed to register self-presenting applicants, defaulting instead to detention (including of vulnerable individuals) in SHTAFs. According to UNHCR, this practice has been systematically implemented since 2015. Protection rates also declined; while the overall recognition rate dropped from 66% in 2023 to 61% in 2024 (UNHCR, 2024a) the fall was especially steep for some nationalities: Syrian applicants, for example, saw their recognition rate plummet from 97.6% in 2023 to just 17.5% in the last quarter of 2024 (UNHCR, 2024b). Key informants highlighted discrepancies in support and access between Ukrainian refugees and other asylum seekers, particularly regarding legal aid and procedural fairness.
- 70) **Despite the existence of a statelessness cooperation framework—established under a 2017 MoU with UNHCR covering multiple areas—institutional engagement has progressed slowly.** In 2024, UNHCR and legal aid partners assisted 33 stateless persons in submitting applications and providing representation in court proceedings. In parallel, UNHCR continued its strategic advocacy to strengthen the legislative and procedural framework for the protection of stateless persons. This contributed to positive changes in the national civil registration framework (November 2024), aimed at addressing long-standing barriers faced by refugees, stateless persons, and undocumented individuals—particularly those from Roma communities—who lacked access to identity and travel documents due to the absence of a registered address.<sup>61</sup> However, the working group on statelessness (under the MoU with the Migration Directorate) has not convened since 2022, and only one training session for Migration Directorate officers on statelessness status determination was held that year—limiting both oversight and quality assurance.<sup>62</sup> Applicants for the statelessness determination procedure are not guaranteed legal stay or access to basic services during the

<sup>58</sup> Protection briefings on detention, access to territory, RSD procedure, monitoring, as well as comments on the draft Law on refugees and asylum, different topics on the EU Pact, as well as the creation of safe third countries list in 2024 status determination of Russian citizens and national security concerns interpretation.

<sup>59</sup> Asylum strategy 2024, p.1

<sup>60</sup> UNHCR also highlights interviewing that does not support meaningful participation and presentation of full evidence and low recognition rates, including for UASC.

<sup>61</sup> Amendments to the Law on Civil Registration, which entered into force in December 2024, introduced a mechanism for municipality-designated “service addresses” for individuals unable to provide a permanent domicile, enabling them to obtain identity documentation and thereby access essential rights and services.

<sup>62</sup> SDP Strategy January 2024, as well as key informant interview.

process. Legal and interpretation assistance is not systematically provided, except when facilitated by UNHCR or its partners, and the procedure contains restrictive exclusion clauses that further limit accessibility.

### *Outcome Area 3: Protection Policy and Law*

- 71) **UNHCR supported the development of national frameworks aligned with international and EU standards, but challenges persist in implementation, access to procedures, and provision of support services for vulnerable groups.** This support included participation in inter-ministerial working groups, provision of expert input to the draft LAR, and detailed comments on the Draft Humanitarian Support and Integration Programme of displaced persons from Ukraine with Temporary Protection. UNHCR also promoted improvements in age assessment procedures for children and advocated for higher standards in the provision of social services for asylum seekers and refugees (UNHCR, 2023c).<sup>63</sup> In addition, UNHCR has produced thematic legal commentaries and recommendations on key protection areas,<sup>64</sup> including independent border monitoring, child protection, legal counselling, and the national implementation of the EU Pact (UNHCR, 2024a).<sup>65</sup> Through its funded partners, UNHCR has engaged in strategic litigation to address gaps in the SDP and continued to advocate for enhanced protection of stateless persons. The pledge of the Government of Bulgaria (2019-2023) to improve the quality of the SDP and withdraw reservations to the 1954 Convention remains a work in progress, representing opportunities for sustained collaboration (UNHCR, 2024e).<sup>66</sup> Despite these advances, implementation gaps persist. While UNHCR's input is frequently reflected in legislative drafts, translating legal reforms into practice has proven to be challenging (i.e. pushbacks practise at the border with Türkiye as Outcome 1 above). Limitations in institutional capacity, overlapping mandates reception monitoring regularly identifies lack of risk mitigation and non-implementation of GBV SOPs developed with UNHCR support in RRCs. In parallel, UNHCR partnered with two specialised national NGOs to deliver capacity-building training to frontline workers on GBV and anti-trafficking, and to conduct refugee-facing information sessions on available services and rights. The contribution of UNHCR also includes joint trainings with the National Commission for Combating Trafficking in Human Beings for several local commissions including Sofia, Plovdiv, Varna and Burgas, and targeted training for the relevant national and local authorities, civil society and volunteers focusing on identification, risk factors and referrals. Furthermore, in 2023, UNHCR developed a Handbook for practitioners on identification and referrals of potential cases of trafficking, alongside a poster, summarizing the main principles, risk factors and contacts. Despite these achievements, major challenges persist. According to the SEIS 2024 (UNHCR and Regional Refugee Response for Ukraine Situation), yet 51% of individuals knew how to access safety and security services for GBV. Bulgaria has not yet ratified the Istanbul Convention (Council of Europe)<sup>67</sup>, and the national GBV response system remains fragmented and underfunded. Key informants reported that socio-cultural resistance and institutional reluctance continue to hinder broader changes. Furthermore, the pool of civil society actors with expertise or willingness to work on GBV, particularly for LGBTIQ+ and displaced populations, remains small. Access to GBV services for forcibly displaced and stateless persons is constrained by the absence of state-led referral mechanisms and reliance on short-term, project-based initiatives by local NGOs. While plans (UNHCR, 2024g)<sup>68</sup> and partnerships exist to address both GBV and trafficking, they are limited in terms of scope, resources and service availability.

### *Outcome Area 5: Child Protection*

- 72) **UNHCR has contributed to improving the protection environment for refugee and asylum-seeking children in Bulgaria, particularly through efforts to strengthen the guardianship system and expand child-friendly procedures for UASC.** Although UNHCR CO does not operate under a standalone child protection strategy or work plan in collaboration with other key stakeholders (national authorities, UNICEF, funded partners, and others), UNHCR has supported both policy development and service delivery. UNHCR

<sup>63</sup> 30:40 p 14.

<sup>64</sup> For example: UNHCR Observations on the Accelerated Procedures Introduced by Bulgaria under the Pilot Project (UNHCR, 2023j) UNHCR, Protection briefing, RSD procedure in Bulgaria (UNHCR, 2024i), UNHCR Comments to the Draft Law Amending and Supplementing the on Asylum and Refugees,(UNHCR, 2024j); UNHCR preliminary comments on the establishment of independent national monitoring mechanism in Bulgaria, (UNHCR, 2024k); UNHCR, UNHCR preliminary comments and observations concerning provisions affecting children for the National Implementation Plan of Bulgaria of the EU Pact on Migration and Asylum (UNHCR, 2024l).

<sup>65</sup> 40:51 p 19.

<sup>66</sup> 34:1 pp 4–5.

<sup>67</sup> The Council of Europe Convention on preventing and combating violence against women and domestic violence, also known as "the Istanbul Convention", is based on the understanding that violence against women is a form of gender-based violence that is committed against women because they are women.

<sup>68</sup> UNHCR GBV workplan 2024, internal document.

has issued recommendations for the National Implementation Plan of the EU Pact, focused on identification, referral, and support mechanisms for UASC and other at-risk children, including those with disabilities, victims or those at risk of trafficking, and children experiencing trauma. UNHCR has provided targeted training for key professionals, including child protection officers, legal aid lawyers, and law enforcement personnel, to improve their ability to address the specific needs of refugee children (70 police officers, 15 social workers, and 67 specialists on child protection management) (UNHCR, 2024b).

**73) UNHCR has collaborated with local municipalities and NGOs to provide alternative care for UASC.**

The collaboration includes the establishment of the residential facility<sup>69</sup> and support for the crisis centre in Ruse (directly managed by Ruse municipality until August 2024) with provision of guidance, donations and capacity building activities. The UNHCR CO also worked with institutions to enhance early identification, access to adequate reception conditions, and guardianship for UASC. UNHCR's collaboration with the National Police to strengthen the initial identification and referral of unaccompanied children should be acknowledged, as it contributes to ensuring that these children are not subject to detention. Despite these gains, challenges persist. In 2024, only 5.47% of UASC were placed in alternative care arrangements, and despite some improvements, the inclusion of refugee children in broader community-based child protection services remained limited (16,008 children and caregivers received child protection services (UNHCR, 2024b)). Coverage rose from 10% in 2023 to 14.05% in 2024, falling short of the 2024 target of 80%.

**74) The absence of a dedicated national coordination body limited financial and human resources, and a shortage of trained social workers, interpreters, and cultural mediators, continue to hinder progress.**

Coordination among UNHCR, UNICEF, and IOM has improved through joint projects and discussions; however, key informants emphasise the need for greater alignment and coherence. Additional limitations are related to the underdeveloped case management screening (initial needs assessment) and referral systems in *Compass Centres*, as well as cultural preferences that affect the uptake of certain services, particularly among Ukrainian families.

**75) UNHCR has effectively facilitated access to education for refugee children in Bulgaria through language support, teacher training, enrolment campaigns, and psychosocial support programs. Gaps in specialised educational support and the absence of a comprehensive national approach to inclusion continue to hinder equitable access for children with disabilities and specific needs.**

In response to persistent barriers to education, including language, administrative challenges, and limited teacher capacity, UNHCR has invested in a range of targeted initiatives. The CO supported Bulgarian language courses, teacher training programs, and the provision of textbooks to facilitate the inclusion of refugee children in formal education. UNHCR has also collaborated with the Ministry of Education and the Education WG to implement a nationwide school enrolment campaign, which led to the highest increase in enrolment rates since the activation of the TPD (according to the Ministry of Education and Science, 4,800 refugee children were enrolled for the 2024-25 academic year) (UNHCR, 2024b). In 2024, UNHCR coordinated a pilot intervention with preparatory classes for 150 newly enrolled children through municipal personal development support centres and supported over 2,600 children in transitioning into the Bulgarian education system by providing age-appropriate support through partners (UNHCR, 2024b). These interventions were complemented by extracurricular educational activities, which included tutoring, exam preparation, Bulgarian language classes, and recreational and cultural programming for children and their families. In parallel, the Academy for Refugee Teachers was established in collaboration with MoES and NGOs specialised on education and teaching Bulgarian as a second language to enhance teachers' skills in teaching Bulgarian as a foreign language, an important step in making classrooms more inclusive for non-native speakers. Efforts were also made to incorporate MHPSS elements, recognising the trauma many refugee children experience due to displacement and war. However, despite these positive developments, gaps remain in the availability of specialised educational support, particularly for children with disabilities and other specific needs. Key informants noted that while general MHPSS services are increasingly available, targeted support for children with learning difficulties, behavioural challenges, or disabilities remains insufficient. The absence of a comprehensive national approach to inclusive education for refugees continues to limit the full realisation of children's right to education.

---

<sup>69</sup> Joint project with Oborishte district of Sofia municipality, BRC and UNHCR funded under the Norway financial programme.

*Outcome Area 7: Community Engagement and Women's Empowerment.*

- 76) **UNHCR has strengthened community engagement in Bulgaria by promoting participatory approaches, responsive communication mechanisms, and initiatives that foster inclusion and social cohesion. However, women's empowerment, as a distinct area of focus, remains underdeveloped.** UNHCR collaborated with local municipalities and civil society actors to implement community-led activities and inclusive platforms that encourage mutual participation. The CO supported forcibly displaced and stateless persons in participating in decisions that affect their lives while working closely with national authorities, civil society, and host communities. In 2023, UNHCR facilitated participatory assessments involving over 4,500 individuals, ensuring that diverse refugee voices, including women and youth, were reflected in programmatic and advocacy efforts. Community engagement was further supported through expanded Communicating with Communities (CwC) initiatives, including three dedicated helplines offering legal counselling, information on protection and inclusion services (UNHCR, 2023c). Additionally, forcibly displaced and stateless persons could submit requests or complaints directly via a general UNHCR mailbox and hotline. In 2024, 1,932 refugees and asylum-seekers used UNHCR-supported feedback and response mechanisms to voice their needs and concerns, although these mechanisms have not been assessed as part of this evaluation (UNHCR, 2024b). By working with Government institutions, partners, and communities, UNHCR continued to promote social cohesion between host and displaced communities. The CO launched the national campaign "Food for Thought" (UNHCR), which focuses on social cohesion and bridging differences between the forcibly displaced and stateless persons, and the local population. However, while women participated in community consultations and had access to feedback channels, there was limited evidence of sustained, targeted initiatives to promote women's leadership, economic empowerment, or gender-transformative programming. Empowerment activities beyond the protection space (such as skills training, livelihoods, or engagement in decision-making) especially targeted at women, remained minimal.
- 77) **The transition from *Blue Dots* to the *Compass Centre* model in 2024 marked a strategic shift to better align with the evolving needs of forcibly displaced and stateless persons and host communities.** UNHCR's efforts focused on collaboration with NGOs at the local level, including those led by refugees, women, and community-based organisations. One of the key approaches promoting collective empowerment and social cohesion has been the establishment of *Compass Centres* (described in section SQ1.1). Each *Compass Centre* operates under the coordination of a lead funded partner, with other NGOs contributing specific services across various sectors, including education, legal aid, livelihoods, local integration, community engagement, and child protection. While there is no formal written framework outlining the services or referral pathways to municipal and state-delegated services, the model reflects a community-driven approach that adapts to local capacities. Many of the funded partners leading these initiatives are women-led organisations or are run by individuals with a refugee background. This not only strengthens inclusivity but also mainstreams lived experience into programme design and delivery. Notably, according to the UNHCR Bulgaria Annual Report 2024, 50% of refugee and asylum-seeking women engaged in these programmes are involved in leadership or management structures (funded partners and other organisations), marking a meaningful contribution to women's leadership. In 2024 alone (UNHCR, 2024b), the *Compass Network* provided over 9,300 individual protection services and mobilised both communities and municipalities in support of refugees. By the end of the year, the centres were receiving approximately 4,000 visits per month. Although the centres were intended to be tailored to the specific local context (UNHCR, 2023g), they tend to operate with similar service models across all locations. Key informants noted that, while the centres are officially open to all refugee groups, they are predominantly used by Ukrainian nationals, pointing to potential gaps in outreach or accessibility for other forcibly displaced and stateless populations. Some of the challenges are also related to the need for specialised translation and the need for trained specialists to work with other refugee groups to meet their needs.

SQ 3.3. In what ways has UNHCR facilitated inclusion, access to services, self-reliance, and socio-economic integration of refugees, stateless,<sup>70</sup> and asylum seekers, in Bulgaria?

*Outcome Area 13 – Self-reliance, economic inclusion and livelihoods*

- 78) **UNHCR has supported two main employment pathways: Caritas Bulgaria career centres<sup>71</sup> (some of which operate as part of the *Compass Centres*), and the Refugee Employment Platform, a regional initiative managed by FAR in Bulgaria.** In the context of persistent barriers to livelihoods, UNHCR's support has focused on expanding access to employment-related services and resources for refugees and asylum seekers. While stakeholders acknowledged achievements in expanding access to employment-related services, they also pointed to several implementation challenges. The Refugee Employment Platform was developed and managed by a funded partner but, according to interviews, it did not meet the expected results (individual case management). To increase the effectiveness of the platform UNHCR decided to directly manage Refugee Employment Platform since 2024. Caritas Bulgaria successfully supported 341 refugees and asylum seekers in finding employment in the first half of 2024, with most placements in the hospitality, services, manufacturing, and construction sectors (UNHCR, 2024j).<sup>72</sup> Despite these efforts, systemic barriers remain, partly compounded by the nature of temporary protection status, which undermines long-term employment prospects. Access to financial services is another critical challenge,<sup>73</sup> as at least 37.22% of forcibly displaced and stateless persons have reported having access to financial institutions or mobile money services.
- 79) **UNHCR has made progress in supporting the economic inclusion of refugees and fostering their self-reliance through employment services, vocational training, and private sector engagement. Partnerships with the private sector and municipalities remain underutilised, and coordination challenges hinder a broader impact.** Local municipalities play a crucial role in refugee integration, as they are closest to the communities involved. There are varying levels of engagement, with some municipalities actively promoting integration initiatives, while others lag in their engagement. Political and social dynamics influence their legislative and practical changes, which are crucial for longer-term solutions. UNHCR has also sought to strengthen ties with the private sector, following the implementation of UNHCR's strategy and guidelines on engaging the private sector.<sup>74</sup> A Letter of Understanding (LoU, 2023) signed with the German-Bulgarian Chamber of Industry and Commerce aimed to enhance refugee access to vocational training and employment opportunities, leveraging the Chamber's network of over 600 companies. While this partnership had potential, key informants noted that concrete links between refugee job placements and the Chamber's support remained limited. Despite Bulgaria's demand for both skilled and unskilled labour, different barriers<sup>75</sup> create challenges for refugee employment. Advocacy and partner-led efforts, including through the Refugee Employment Platform, have sensitised more than 600 employers on the rights of refugees to work. Sixty-six new companies registered on the employment platform, and approximately 350 employers were actively engaged in refugee employment initiatives. UNHCR's approach has also included targeted support for women's economic empowerment, with a first agreement for a private company to deliver vocational education and training, mentorship, and entrepreneurship support to refugee women; however, the scale of the activities is still very small.<sup>76</sup> At the same time, there is a need to strengthen technical capacity of municipalities and to help develop and implement holistic and inclusive policies and programmes, which foster economic inclusion, while also identifying and providing assistance to vulnerable groups. Additionally, there

<sup>70</sup> The available information and data on the socio-economic integration of stateless persons was scarce. For most of the indicators, there is no available data.

<sup>71</sup> According to the Annual report in 2023 UNHCR's main livelihood partner established five career centres around the country to provide career counselling and individualised employment-support services, reaching 2,400 refugees and asylum-seekers that year alone, and as part of the *Compass Centres* in Burgas, Varna, Plovdiv, and Sofia.

<sup>72</sup> 25% were involved in hospitality, 25% - in services, and 24% - in production and construction activities. 2024 Q2 Protection Profiling and Monitoring Brief – July 2024.

<sup>73</sup> TPH are entitled to open bank accounts, but banks deny services to foreigners perceived as from "high-risk countries", which excludes asylum seekers (who lack formal documentation) but also reduces opportunities for formal employment and entrepreneurship.

<sup>74</sup> EC/75/SC/CRP.12 - Private Sector Fundraising (Executive Committee of the High Commissioner's Programme, 2024).

<sup>75</sup> E.g., 10-day limit to sign a contract after receiving the right to work and temporary nature of protection status, among others. Additionally, lack of fluency in Bulgarian is one of the main barriers to finding work. Other causes include complex and lengthy procedures for practising regulated professions, and low wages that are insufficient to cover basic needs. The discontinuation of government humanitarian assistance one month after work permit holders began working was also mentioned as a factor negatively affecting employment prospects.

<sup>76</sup> The first Memorandum of Understanding (MOU) with a private company (a bakery). This bakery had already been training and certifying Ukrainian women, helping them find jobs or start home businesses. Last year (2024) three women completed training, with one now employed in a bakery and another planning to open her own.

is potential to strategically engage the private sector at the local level to develop initiatives aiming at filling labour gaps, while at the same time contributing to supportive functions for socio-economic inclusion. To better understand opportunities to match refugees with job-opportunities in areas with labour gaps, a detailed assessment both of market opportunities (linked to refugee profiles) and services available to refugees (and how to fill potential gaps) would be required. In the context of severe budget cuts and reduced operational capacity, the UNHCR could build on the successful experiences of labour integration documented in other operations (e.g. Welcome Programme in Italy, Local Integration Programme in Mexico). The achievements and evidence produced by other operations can be used to further raise awareness among the private sector and national institutions.

- 80) **UNHCR's livelihood interventions have improved refugees' access to employment. Although these interventions have only reached a limited number of refugees, they serve as an example for other institutions and organisations to follow in developing a more inclusive labour market.** Despite challenges in coordination, structural barriers, and administrative and legal obstacles to accessing identity documentation, as well as the need for recognition of educational and professional qualifications, UNHCR and its partners have supported over 3,900 refugees in accessing employment. UNHCR has been providing employment-related information sessions, individual counselling for upskilling, reskilling and job placement, entrepreneurship programs, and access to job fairs for refugees. According to the UNHCR Annual report for 2024 these efforts have led to over 700 refugees securing stable employment, primarily in sectors such as manufacturing, hospitality and services, construction, finance, and accounting. Data from the 2024 Annual Report indicates that 6.1% of working-age refugees and asylum seekers were unemployed, but only 11% reported a positive change in their income compared to the previous year. According to the 2024 SEIS, 4% of refugees (mostly working age Ukrainians) identified as unemployed.<sup>77</sup> However, since Bulgaria's national unemployment rate is also low (3.9%), it is difficult to determine the direct contribution of UNHCR-supported interventions to national or community-level employment trends. Progress on tertiary education for refugees in Bulgaria has seen some developments in 2024, particularly for those under temporary protection. Following UNHCR's advocacy, the Council of Ministers approved an increase in the annual quota of subsidised university places from 150 to 400 and accepted recommendations to improve flexibility and accessibility in the admission process (UNHCR, 2024j). While operational follow-through remains limited and partner engagement in this area is minimal, UNHCR has signed MoUs with the University of Sofia, the New Bulgarian University and the American University, has supported students with CBI (see SQ 3.5), and facilitated outreach through information sessions, reaching over 100 TPBs.

#### *Outcome Area 16 – Local integration and other local solutions.*

- 81) **Partnerships between UNHCR and municipalities, the establishment of *Compass Centres*, and positive litigation efforts have all played a key role in advancing refugee integration. However, progress is hindered by political instability, informal referral systems and bureaucratic obstacles to accessing national social protection services.** Through the strategic shift toward municipal engagement, UNHCR prioritised operational collaboration with local governments as a pathway to inclusion. Memoranda of Understanding were signed with municipalities,<sup>78</sup> aiming to institutionalise local support for refugee integration. According to key informants, while this signalled growing political will at the local level, attempts to revitalise and expand the national integration programme have been hindered by political instability, inconsistent commitment, and the absence of dedicated funding. For example, the *Compass Centres* were planned as the entry point for refugee inclusion and local integration, mostly used by Ukrainian TPBs, with services that include community-based protection, livelihoods counselling, psychosocial support, legal assistance, and facilitation of access to education, health, and social assistance. To strengthen institutional linkages, *Compass* staff received sector-specific training to better navigate and support referrals to national social protection systems. Despite these efforts, the referral mechanisms remain informal and inconsistently applied, with no unified case management approach across centres. Additionally, while the centres provide critical information and guidance, there are no formalised pathways that ensure systematic follow-up or integration into municipal or national service delivery frameworks.<sup>79</sup> UNHCR and its partners have worked to

<sup>77</sup> Notably, 35% of working-age temporary protection holders in Bulgaria are not part of the labour force. As they are not employed, they are not available to start work within the first two weeks once a job or business opportunity arises.

<sup>78</sup> Blagoevgrad, Sofia, Plovdiv, Varna, Burgas, and Ruse.

<sup>79</sup> RBE\_Survey on Inclusion in Social Protection\_Answers\_Bulgaria.

close this gap by accompanying individuals through bureaucratic processes,<sup>80</sup> providing legal aid through litigation efforts, which have resulted in over 800 court decisions upholding refugees' rights to social assistance. Despite these positive outcomes, coverage under the national social protection system remains limited. The SEIS (UNHCR and Regional Refugee Response for Ukraine Situation, 2024) shows slightly more encouraging results for Ukrainians under temporary protection, with 26% reportedly covered by social protection systems. Bureaucratic complexity, limited outreach, and social discrimination continue to prevent many individuals from accessing benefits to which they are legally entitled.

- 82) **Despite UNHCR's continued advocacy and support for local inclusion in social protection and housing schemes, efforts remain fragmented and unsustainable due to the absence of municipal ownership, housing market constraints, and the lack of a formal national strategy, leaving vulnerable refugees at ongoing risk of exclusion.** Although municipalities were involved in initial outreach and design, the *Compass Centres* continue to operate independently under the management of funded partners and with UNHCR's financial and technical support. Local integration initiatives thus remain fragmented and dependent on project-based funding cycles, without being systematically embedded in municipal service portfolios or long-term planning frameworks. As a result, the long-term continuity of these efforts is uncertain, and the institutional memory required for sustained refugee inclusion is at risk of being lost with each intervention cycle. The RBE (UNHCR, 2023e) provided continuous support to the CO, offering a draft Social Protection Strategy (2023-2026), aimed at promoting effective inclusion of refugees in the government social protection system. This strategy was intended to be transformed into a formal roadmap; however, this suggested strategy was not formalised by the CO. Nevertheless, guided by ongoing RBE support, UNHCR CO continued its advocacy for a national inclusion programme throughout 2024. These efforts included lobbying for improved access to social housing, tackling discriminatory practices in the private rental market, and supporting some targeted initiatives in collaboration with municipalities.<sup>81</sup> However, housing constraints persisted, as municipalities have no legal mandate or state budget to build or maintain a social housing stock, and there is no national housing strategy in place. According to the 2024 SEIS, 56.7% of temporary protection holders lived independently, 19% in hotels, 12% in collective centres, and 10% in shared housing. While 25% reported challenges in their living conditions (mainly due to lack of kitchen facilities, food storage, or privacy) the majority have been able to maintain stable housing arrangements. However, refugees often struggle to secure appropriate housing due to financial insecurity, landlord reluctance, and legal gaps in Bulgaria's housing policy. These barriers are particularly acute for those in vulnerable situations, such as individuals arriving without financial resources or with pre-existing debt.

**SQ3.4. To what extent have the UNHCR Cash-based Interventions (CBI) contributed to protection outcomes for those receiving cash? (for further information, see Appendices 12 and 13)**

- 83) **The evolution of UNHCR's CBI in Bulgaria reflects a shift from short-term emergency relief toward a more structured, protection-based social support mechanism. Even if it did not fully achieve its potential, it partially bridged gaps in state social protection systems.** Initially introduced in 2022 as one-off payments to address urgent needs at the onset of the Ukraine Refugee Situation, the CBI programme was revised by mid-2023 in response to regional guidance and audit findings to better address specific unmet needs. In 2024, CBI transitioned to multipurpose cash transfers to improve stability and predictability for households. UNHCR Bulgaria positioned CBI as a potential tool to support social protection and inclusion, aiming to implement necessary accompaniment measures to support households accessing national social protection systems and opportunities for inclusion (UNHCR, 2024e, 2024i).<sup>82</sup> Despite the presence of a mechanism linking CBI to case management, funded partners did not use CBI as a channel for protection referrals.<sup>83</sup> While CBI reached its targeted caseload,<sup>84</sup> its potential as a gateway to broader protection

<sup>80</sup> E.g. mediating with service providers and providing cultural interpretation. UNHCR has also assisted refugees in accessing a range of benefits, including disability and social pensions, monthly financial assistance, and family allowances.

<sup>81</sup> E.g. accommodation for Ukrainian refugees in Plovdiv's municipal "Second Home" facility, run by USRF in the building provided by the municipality. The THP placed there are typically among the most vulnerable and often lack even basic means, such as funds for public transportation.

<sup>82</sup> Support received from the UNHCR Regional Bureau Europe (RBE) on cash transition towards social protection and private sector engagement and to include refugees in the national social assistance programme, via workshops, monitoring missions, Draft 2023 Roadmap on Social Protection, etc (as per internal documentation).

<sup>83</sup> Key informant interviews.

<sup>84</sup> Target OL 2024 9,000 people, according to UNHCR Bulgaria output indicator framework.

outcomes, including linkages with the national social system, remains underutilised (UNHCR, 2023d),<sup>85</sup> falling short in addressing persistent barriers to accessing social assistance and services.

84) **Cash-based Interventions have provided immediate financial relief and supported protection for vulnerable refugees but have faced limitations in expanding targeting and addressing basic needs beyond the short term.** In 2023, CBI reached over 13,600 individuals (4,600–6,200 households) (UNHCR, 2023c) and more than 9,700 persons in 4,400 households in 2024 (UNHCR, 2024b),<sup>86</sup> with additional winterisation support to 3,761 households facing harsh weather conditions.<sup>87</sup> Most of the recipients were Ukrainian TPB. Targeting relied primarily on dependency-based criteria, such as the number of children, with some additional vulnerability categories (medical needs or disability) that are not always well documented or clear. By aligning transfer values with government benchmarks and establishing multi-month assistance cycles in 2024,<sup>88</sup> CBI have served as a temporary substitute for inaccessible national programs. They have enabled beneficiaries to cover essential needs, particularly food and health and, to a lesser extent, housing (UNHCR, 2023f), and reducing the likelihood of negative coping strategies.<sup>89</sup> CBI analysis of post-distribution data (PDM 2024 – 2025)<sup>90</sup> indicates that stress levels decreased among recipients, especially among women, and satisfaction with basic needs improved, although perceptions of living conditions declined. While donor funding for CBI was initially limited to refugees from Ukraine, UNHCR strived to include transition to a vulnerability-based cash programme, inclusive of all asylum seekers and refugees. However, in the absence of vulnerability data, valid contact details being not included in any database, and lack of valid documents (for instance, cash for education for UASC), this was not always possible. Further findings on this analysis can be found in Table 3 **Error! Reference source not found.** below and Appendix 12.

**Table 3 Key Findings from Statistical Analysis of CBI data (2024–2025) related to protection**

Thematic Area	Key Findings
1. Basic Needs Coverage	<ul style="list-style-type: none"> <li>Coverage improved significantly in 2025 compared to 2024.</li> <li>Strongest improvements in basic needs coverage were among respondents who were younger, received higher cash amounts, had reduced stress, used fewer risky coping strategies, and had access to timely/clear information (e.g., via help desks and social media)</li> <li>Most households still reported unmet needs.</li> </ul>
2. Stress Reduction	<ul style="list-style-type: none"> <li>Reported stress levels significantly declined.</li> <li>More pronounced among younger and women respondents, respondents with improved basic needs coverage and better living conditions, and respondents who reported satisfaction with CBI.</li> <li>Emotional resilience linked to better access to varied food and communication from UNHCR.</li> </ul>
3. Coping Strategies	<ul style="list-style-type: none"> <li>Over 84% still relied on negative coping strategies in both years with no significant year-to-year change.</li> <li>Use of negative coping strategies were linked to unmet needs and lack of reliable information (e.g., reliance of friends/family for info), and use of informal markets.</li> </ul>

<sup>85</sup> Evidence collected globally by UNHCR PDM, programme evaluations, and child protection practice, suggests that unrestricted cash grants for basic needs have a positive impact on the protection situation when integrated by systematic referral pathways to other complementary protection services. CBI can be an avenue to facilitate the identification of individuals in need of specialized protection services and their referral to individual support through case management.

<sup>86</sup> Subsistence assistance was the primary component of this programme, assisting 4,434 households (9,696 individuals) in meeting their essential needs and reducing risks of negative coping mechanisms, as highlighted in post-distribution monitoring. This programme was complemented with winterization support to 3,761 households facing harsh weather conditions. Over 1,800 households also benefited from primary education cash grants, while 81 households received higher education support through university grants. UNHCR Bulgaria, Annual Results Report, 2024 (internal).

<sup>87</sup> In 2024, CBI recipients received BGN 900 (approx. USD 520) multipurpose cash (BGN 400 for basic needs and BGN 500 winterisation), and an education top-up of BGN 300 (USD 173) per 6-11 years old child. Grants could be cumulated. In 2025, only the multipurpose cash was maintained.

<sup>88</sup> Four months transfers and Winter Top-up (Sep 2024 onwards).

<sup>89</sup> Such as sell livelihood and assets to buy food, skip rent payments, send underage to work etc.

<sup>90</sup> Cash-Based Interventions in Bulgaria: An Analysis of Post-Distribution Monitoring by UNHCR, Avicena, May 2025 (Appendix 12). This analysis was based on UNHCR CBI PDM data sets 2023-2025. There are some limitations to the methods used in this analysis. The sample was chosen non-randomly and data was collected manually, which may limit generalisability to other settings.

- Mitigated by access to varied food, and direct, clear communication from UNHCR.

4. Living Conditions Perception

- Fewer respondents reported improved living conditions in 2025 compared to 2024.
- Economic pressures such as inflation, and information gaps, including lack of info on UNHCR services, worsened perceptions.
- Varna residents reported more positive changes than other regions.

85) **The rollout of the CBI programme marked a significant operational development for UNHCR Bulgaria in supporting forcibly displaced and stateless persons, but the amounts and duration of cash assistance often fell short of sustaining meaningful protection outcomes.** Although perceptions of the CBI programme differ between UNHCR and other informants, evidence gathered from multiple sources enables the evaluation to document both the programme’s achievements and strengths, as well as the gaps and limitations encountered. The one-time payments in 2023, while providing immediate relief to urgent needs, were insufficient for sustained support, with over 80% of beneficiaries reporting unmet needs after receiving assistance (UNHCR, 2023c).<sup>91</sup> Interviews with UNHCR staff and other sources indicate that the programme was a key milestone in the operation’s efforts to assist persons with specific needs, enabling outreach to a wide range of vulnerable groups, timely delivery of CBI, and high satisfaction levels among recipients. However, other informants, including UNHCR staff and partners, raised concerns about the programme’s limited adaptation to the local context, inconsistencies in interview techniques that led to underreporting of vulnerabilities, the amount<sup>92</sup> and duration of CBI support, the insufficient involvement of funded partners in programme design and eligibility criteria, and UNHCR’s limited responsiveness to partner feedback. In 2024, multi-month assistance relied on pre-existing registration databases, with limited flexibility to address emerging vulnerabilities and needs<sup>93</sup> (e.g. pregnant women, GBV survivors, recent arrivals<sup>94</sup>). That year, UNHCR introduced several changes to CBI targeting, including eligibility verification phone calls, training caseworkers to improve vulnerability assessments, monitoring data entry accuracy, and implementing data quality checks which led to some improvements.<sup>95</sup> Additional issues cited included outdated beneficiary lists, unclear data collection processes, and weak links between cash support and broader protection outcomes. Explanatory factors included staffing gaps, limited expertise in case management, and the short timeframe for implementation (last quarter of 2024) and follow-up.

**SQ3.5. Has the design of CBI contributed to greater self-reliance?**

86) **While CBI was expected to evolve into a pathway for self-reliance and socio-economic inclusion, this was only partially realised.** In 2023, discussions took place to guide this transition by connecting cash assistance to national social protection and labour market pathways.<sup>96</sup> This integration component offered potential linkages with UNHCR’s CBI programme, but its implementation depended on the Bulgarian Government’s financing capacity. A proposal to embed CBI in municipal integration pilots, supporting housing and job placement for refugees, remained at the planning stage by 2023,<sup>97</sup> with no confirmed implementation or funding, undermining the programme’s contribution to building household resilience or supporting

<sup>91</sup> According to UNHCR reported data, the analysis available under the PDM global meta-analysis for CBIs for 2023 for Bulgaria indicates that 42% of households have seen a moderate improvement in living conditions and 41% a significant improvement as result of UNHCR assistance. 39% of households indicating a significant reduction and 39% a moderate reduction in overall stress as result of UNHCR cash support. However, the unmet needs indicator differs from the indicators on living conditions and stress reduction. According to the statistical analysis of the three PDM datasets conducted by the evaluation, the results for the stress reduction indicator are consistent with the information provided by UNHCR’s Regional Bureau at the time of writing. In contrast, the results for the living conditions indicator differ from the information provided by the Regional Bureau.

<sup>92</sup> In accordance with international and national standards for Cash-Based Interventions (CBI), the transfer amounts were defined and validated by the Agency for Social Assistance. This does not, however, preclude the fact that the programme encountered challenges during implementation, and that the transfer amounts were perceived as insufficient to enhance beneficiaries’ economic self-reliance. It should be noted, as highlighted in several sections of this report, that the CBI was implemented as a response to immediate needs rather than as an intervention designed to promote longer-term economic self-reliance.

<sup>93</sup> In late 2024 the operation, with DIMA RBE support, performed a review of existing SEIS and proGres data sets to confirm / fine tune eligibility criteria for CBIs. As a result, eligibility was broadened with respect to 2023, even though with 3 criteria instead of 7 as in 2023 - new criteria were overall broad and inclusive. In the end, about 80% of the caseload registered for 2023 was found to be eligible for 2024. For accuracy, the existing caseload was all verified through phone calls. In addition, 500 households / 1,000 individuals that were not included under the existing proGres data sets of 2023 beneficiaries, were included under 2024 thanks to direct referrals from partners.

<sup>94</sup> From 2024 CBI distribution for new arrivals was IFCR responsibility and at the end of 2024 GBV was added as part of the criteria to receive CBI by UNHCR in Bulgaria.

<sup>95</sup> UNHCR reports that vulnerability was verified and updated as per late 2024 verification exercise.

<sup>96</sup> Internal Mission Report, Bulgaria socio-economic inclusion support mission, UNHCR RBE, May 2023 and subsequent communications

<sup>97</sup> Internal Mission Report - Integration Officer, UNHCR RBE, October 2023 and subsequent communications.

refugees' integration into the national economy. In addition, the amount of CBI considered sufficient to meet immediate needs has been perceived as modest for fostering self-reliance. Analysis of the PDM databases (Appendix 12) corroborates that the amount of cash received had a positive but statistically non-significant coefficient, suggesting that while economic support plays a role, its direct impact may be mediated by other factors such as inflation, spending priorities, or broader psychosocial stability. In 2024, CBI expanded to include targeted support for education, reaching over 1,800 households with primary education grants and 81 households with university support (UNHCR, 2024b). Yet, the impact was limited: primary education grants were distributed based on the presence of school-aged children rather than confirmed enrolment, and higher education grants were too few and under-monitored to assess longer-term outcomes. Further findings can be found in Table 4 below.

**Table 4. Key Findings from Statistical Analysis related to self-reliance 2025<sup>98</sup>**

Thematic Area	Key Findings
Financial Inclusion	<ul style="list-style-type: none"> <li>• Access to financial services—especially bank accounts, productive assets, and loans—dropped significantly between 2024 and 2025.</li> <li>• Lack of access to loans, low information access, and informal housing were strong predictors of financial exclusion.</li> <li>• There were no major gender disparities across financial inclusion indicators.</li> </ul>

SQ3.6. What factors have affected the achievement/non-achievement of results (contextual, operational, etc.)? (referring to all above SQ under EQ3)

87) The following table presents the main factors (contextual and operational) that have overall affected results:

**Table 5. Main factors (contextual and operational) that have overall affected results**

Contextual Factors	Operational factors
<p><b>Political instability:</b> The absence of a stable national government at critical times, combined with high institutional turnover, posed challenges to UNHCR operations. Limited prioritisation of these issues has slowed progress on legislative reforms and the establishment of a comprehensive, state-led integration framework. Nonetheless, sustained advocacy, opportunities within political shifts, the EU Pact, and growing cooperation have led to important gains for the operation.</p> <p><b>Sociopolitical and cultural resistance:</b> Conservative attitudes and political reluctance have limited systemic change, particularly in sensitive areas like gender-based violence, LGBTIQ+ inclusion, and guardianship systems for unaccompanied children.</p> <p><b>Growing and complex displacement context:</b> The overlapping needs of refugee groups (including Ukrainian nationals, asylum seekers from other regions, and stateless persons) have placed pressure on national systems and strained institutional capacity.</p> <p><b>Economic and resource mobilisation context:</b> Inflation, economic slowdown, and complex EU-funding rules (state-only recipients) have reduced overall NGO sector capacity. At the same time, due to the Ukraine crisis UNHCR (as well as IOM, UNICEF) were able to secure significant funding allowing for expansion of staff,</p>	<p><b>Internal capacity:</b> The arrival of new senior staff in 2022 and 2023 strengthened UNHCR's strategic vision, leverage, and protection expertise. However, frequent changes in both national and international focal points have undermined continuity, eroded relationships, and disrupted strategic alignment with partners, including government counterparts.</p> <p><b>Thematic strategies:</b> The lack of formal, written, and updated strategies and workplans across key OAs (i.e. engagement with government institutions, social and economic inclusion, protection, etc) meant that operational approaches tend to be <i>ad hoc</i> and reactive, shaped by immediate circumstances rather than longer-term planning, yet aligned with the MYS and results framework. While regular monitoring and follow-up mechanisms are in place, mostly at output level, the absence of structured comprehensive strategies makes it difficult to track progress at outcome level and impact level, understanding of tasks by UNHCR focal points and funded partners, and to ensure consistency across thematic areas.</p> <p><b>Reliance on short-term, civil society-led service delivery:</b> UNHCR was able to deliver protection components through responsive and flexible NGO partnerships. These partnerships enabled timely, targeted interventions and filled critical gaps in state provision. However, some components (GBV, MHPSS, legal aid, etc) depend on project-based interventions without effective</p>

<sup>98</sup> Cash-Based Interventions in Bulgaria: An Analysis of Post-Distribution Monitoring by UNHCR, Avicena, May 2025 (Appendix 12).

Contextual Factors	Operational factors
<p>funded partners and efficient response to humanitarian crisis.</p> <p><b>Policy–implementation gap:</b> National authorities have incorporated UNHCR’s recommendations into legislative and policy processes. While legal and policy frameworks often reflect international standards, practical enforcement remains inconsistent due to limited resources and accountability mechanisms, and bureaucratic barriers.</p>	<p>integration into state systems; this involves providing services that depend on external funding and have limited prospects for handover to national institutions or sustainability. Shifts in strategic priorities and adjustments have also increased pressure on local civil society partners, many of whom operate with limited capacity and resources.</p>

## 2. UNHCR CO's structure and organisational changes

KQ4: In light of RBE prioritisation decisions in resource allocations across operations, to what extent was UNHCR's Bulgaria structure, staffing and resource allocation adequate and fit to meet the objectives set out in its current strategy? (Efficiency)

88) From 2022 to 2024, UNHCR Bulgaria recalibrated its structure and resource strategy to respond to the scale and urgency of the Ukraine refugee crisis, while maintaining high budget execution rates. Staff and budget capacity were rapidly expanded in 2022 (workforce expansion peaking at a 207% increase in 2022), followed by strategic refocusing in 2023 and contraction in 2024. While this dynamic enabled flexible mobilisation in high-priority areas—such as cash-based assistance, reception support, municipal engagement, and the rapid establishment of service infrastructure (e.g. Blue Dots and later Compass Centres), it also revealed a pattern of planning driven more by funding availability than by a long-term approach. Recent 2025 budget cuts<sup>99</sup> (–60% staff, –40% activities) have had a significant impact on the operation's capacity, making it difficult to reconfigure the CO's strategy and presence.

89) Between 2022 and 2023, the CBI programme in Bulgaria expanded significantly, achieving high transfer efficiency (87% of funds channelled directly to households) and adapting its design to include social inclusion elements like education. However, 2024 revisions that narrowed eligibility and introduced a single lump sum reduced programme flexibility, underscoring the difficult balance between financial efficiency and equitable access to aid.

90) The CO's adaptive structure and responsiveness was made possible by high absorption capacity and agile deployment mechanisms, including temporary staffing and short-term partnerships. Resource allocation aligned with strategic objectives during the first phase of the emergency response but was uneven across budget lines: available funds were at near full levels for STAFF and ABOD, while operations (OPS) budget line remained under-resourced. UNHCR Bulgaria's operational capacity was undermined by delays in recruitment, high staff turnover, fragmentation across teams, and vacancies in roles such as GBV, livelihoods and data management. Reliance on a narrow donor base (mainly bilateral US funding) and limited diversification affected the CO's ability to diversify partnerships and plan predictably.

SQ 4.1. Has UNHCR's capacity and resources in Bulgaria enabled the organisation to fulfil its mandate, effectively address needs and achieve the desired results?

91) **Between 2022 and 2024, the UNHCR CO's funding model went through two distinct phases: in 2022, 83 % of resources were earmarked or tightly earmarked, limiting budget allocations to a few priority areas (see SQ 4.2); then, in 2023-2024, flexibility improved, with 67 % of funds coming from unearmarked (65 %) or softly earmarked (2 %) sources, enabling a more agile response to evolving needs.**<sup>100</sup> However, this funding model presented several vulnerabilities. On the one hand, earmarked contributions accounted for 43% of available funds (US\$14.1 million out of a total of US\$32.3 million), while the gap between indicative allocation funding levels<sup>101</sup> and total funds available (OL) over the 2022-2024 period increased considerably from 17% in 2022 to 60% in 2024. This trend suggests increasing difficulties in mobilising additional donors for the operation in Bulgaria (see Figure 5 below). On the other hand, funding remained highly concentrated around a single donor, with the United States providing 87% of earmarked contributions, or 38% of total available funds (OL) over the period. Although US share decreased from 2022 (78%) to 2024 (31%) due to an increase in indicative allocation funds, this dependence has exposed the operation to financial volatility and limited its ability to strengthen budgetary resilience in a fluctuating funding

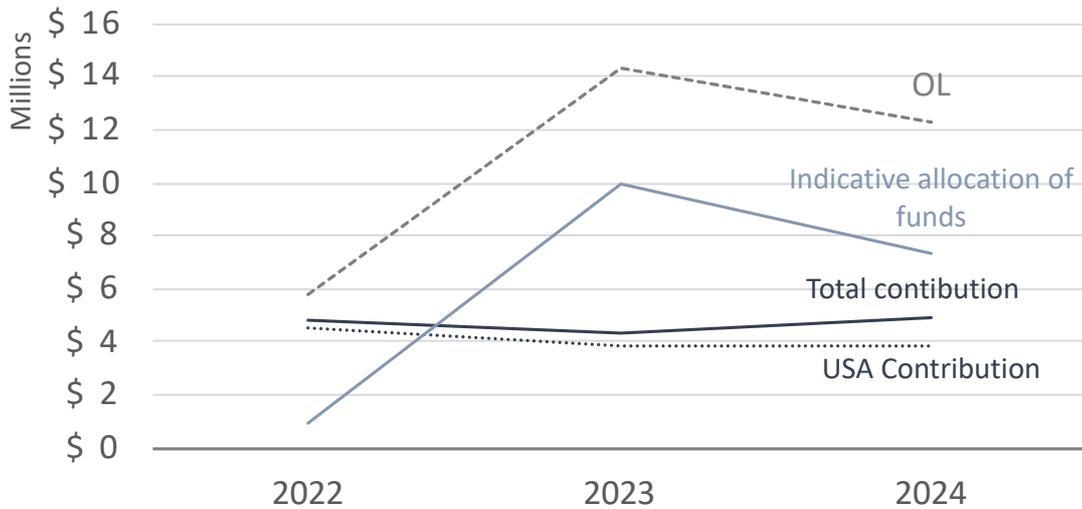
<sup>99</sup> Although outside the scope of the evaluation, the budget reductions are mentioned due to their critical implications for the planning of UNHCR Bulgaria and the use of the evaluation recommendations.

<sup>100</sup> UNHCR Bulgaria: Funding Update 2022-2024; WCA 2018-2023 Funding Data for Evaluation Analysis.

<sup>101</sup> Available funds (OL) consist of contributions from donors and indicative allocation funds, which are estimates of the UNHCR's capacity to fund the operation. More contributions mean more donors for the operation. Donor contributions are at least 'earmarked', while indicative allocation funds are 'unearmarked'.

environment.

**Figure 5. Indicative allocation and contributions in relation to available funds (OL) - 2022-2024**



Source: UNHCR Bulgaria \_Budget\_Download (2022-2024); Bulgaria CO Funding Updates (2021-24)

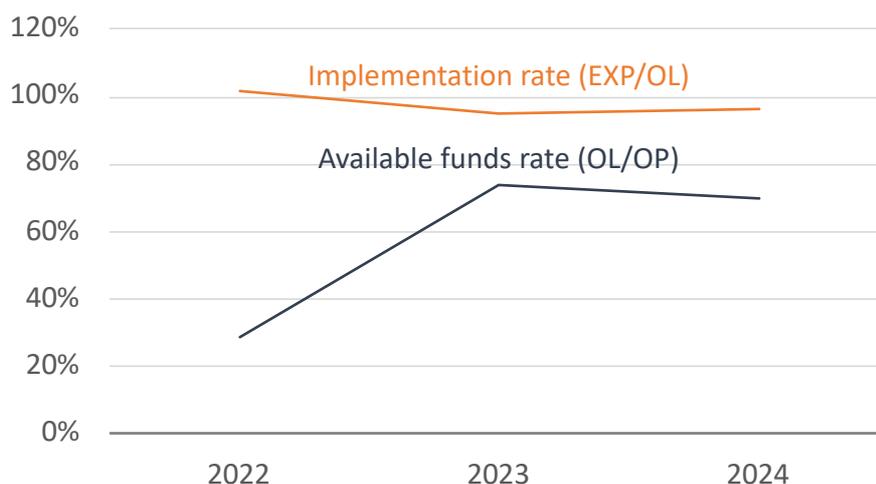
- 92) **Between 2022 and 2024, UNHCR recorded a significant improvement in the allocation between planned budgetary requirements (OP) and available resources (OL), reflecting a strengthening of needs-based planning.** However, this progress was accompanied by an unbalanced distribution of resources over the planned and financed activities, with prioritisation at times driven more by funding availability than by operational priorities (OIOS–UNHCR, 2023; UNHCR, 2023a)<sup>102</sup>, and inconsistencies for certain budgetary shifts during the evaluation period (see Figure 9 below).<sup>103</sup>
- 93) **Analysis of the financial data from the 2022-2024<sup>104</sup> shows a significant reduction in the gap between need-based budget (OP) and available funds (OL).** Whereas in 2022, only 29% of the required funds had been released, in 2023 and 2024, the average available funds was 72%, reflecting a better alignment between operational planning (OP) and financial availability (OL) (see
- 94)
- 95)
- 96) Figure 6 below). Additionally, over the evaluation period, budget execution is at a maximum (97% average execution rate between 2022 and 2024).

<sup>102</sup> Structural limitations were identified in the integration capacity of both Bulgaria’s national system and the broader European Union framework in response to the Ukrainian refugee crisis. Interview data suggest that the readiness of these systems was overestimated. Budgetary constraints led to the replacement of experienced personnel with less qualified staff, undermining institutional capacity. Historically, technical support had been bolstered by the deployment of experts from other UNHCR operations, including those in Greece, Türkiye, Syria, and Poland. However, the 2023 Annual Report notes that the operation increasingly relied on temporary appointments to fulfil critical risk management and internal control roles, which “limited its ability to carry out the required processes in a timely and thorough manner.” Furthermore, the OIOS audit (2023) observed that “the information collected during the needs assessments was not always used to inform strategic planning and decision-making processes as intended,” and that although displaced persons in Bulgaria had clearly articulated needs in areas such as health, education, and accommodation, the Representation lacked a coherent plan to address them.

<sup>103</sup> Between 2022 and 2024, successive budget reallocations across Impact Areas and Outcomes (see SQ 4.2) reduced the clarity and coherence of the planning framework associated with each Outcome and Impact Area from one year to the next.

<sup>104</sup> Bulgaria (2022- 2024) Budget; Budget-Expenditure Bulgaria (2022-2024) (Internal Excel files).

**Figure 6. Evolution of the OL/OP rate and the Expenditure /OL rate - 2022-2024**



Source: UNHCR Bulgaria \_Budget\_Download (2022-2024); Budget-Expenditure Bulgaria (2022-2024)

97) Available funds (OL) allocated to the STAFF budget line reached 99% of its needs-based budget (OP), compared to just 54% for the operations budget line (OPS) over the period 2022 - 2024 (see Figure 7 below). Nevertheless, the CO has maintained a high level of operational capacity, with the OPS budget accounting for 75% of the total available resources over the entire evaluation period.

**Figure 7. Evolution of available funds (OL) and OL/OP rate by budget line 2022 - 2024**



Source: UNHCR Bulgaria \_Budget\_Download (2022-2024); Budget-Expenditure Bulgaria (2022-2024)

98) This trend has been accompanied by a steady increase in available funds (OL) allocated to the ABOD and STAFF budget lines, which saw a 95% increase between 2022 and 2024, to the detriment of operational line (OPS), which after recording a significant 174% increase between 2022 and 2023 saw a 23% drop in 2024. The data shows that the available funds for STAFF and administration (ABOD) have remained stable, even in 2024 when available funds for operations (OPS) declined, thereby lowering the capacity to respond.

99) For the period 2022-2024, the evolution of the unit cost between the STAFF and ABOD needs-based budget categories (OP) over the number of forcibly displaced and stateless persons has

recorded a significant growth of 48% (see Figure 8 below) reflecting a strengthening of the organisational structure, but also the difficulties encountered by the operation in anticipating and planning its needs. For its part, the unit cost of the OPS budget category rose sharply in 2023 (+79%), before declining by 9% in 2024. Based on the available data, it has not been possible to identify any factors that explain the annual fluctuations in unit costs.

**Figure 8. Evolution of STAFF & ABOD unit cost per person and OPS unit cost per person (OP and OL) - 2022-2024<sup>105</sup>**



Source: UNHCR Bulgaria Budget\_Download (2022-2024); Budget-Expenditure Bulgaria (2022-2024); Population Statistics Reference Bulgaria (2021-2024)

100) **UNHCR’s corporate procedure for transitioning from a needs-based budget (OP) to an available budget—and consequently from need-based strategic planning to execution—lacks traceability.<sup>106</sup> This limits the ability to conduct consistent analyses of the alignment between strategic objectives and prioritisation.** UNHCR’s COMPASS system is limited in its ability to retain a historical record of budgetary and programme modifications<sup>107</sup>, thereby restricting the availability of information required for effective oversight, monitoring and evaluation processes at country level. In particular, the indicative operating level budget (IOL)<sup>108</sup> and the justifications for budgetary and programmatic adjustments made throughout the year could not be documented, which impeded the analysis of changes and the implications of financial modifications.<sup>109</sup>

**SQ 4.2. How well does UNHCR’s organisational structure and budget allocation align with its strategic objectives, considering the evolving context, changing needs and shifting priorities related to the Ukraine refugee influx?**

101) **The alignment between UNHCR’s organisational structure and budget allocation in Bulgaria shows a strong capacity to adapt in times of crisis but also reveals budgetary constraints that limit the sustainability of long-term interventions.** UNHCR has shown great flexibility in redirecting resources to short-term priorities and ensuring their effective implementation. However, the volatility of contributions and insufficient funding for certain programmes have hampered sustainability.<sup>110</sup> Overall, CO Bulgaria’s budget evolved in three phases between 2021 and 2024 (see Figure 9 below):

1. **A rapid expansion of the humanitarian response plan:** due to the massive influx of people from Ukraine in 2022, the needs-based budget (OP) increased from US\$1.9 million in 2021 to US\$20.1 million in 2022; however, only 29% of this amount was available (OL). Of these available resources, 84% were

<sup>105</sup> The cost per person is based on population statistics provided by UNHCR and refers to the cost per forcibly displaced and stateless person (FDSP). The acronym is used in the figure to facilitate readability.

<sup>106</sup> Please refer to the Limitations section for further details.

<sup>107</sup> See OIOS Internal audit division, report 2024/097, Audit of the implementation of COMPASS, the results-based management system at the United Nations High Commissioner for Refugees, as well as other independent assessments referenced in the Limitations section.

<sup>108</sup> See definition in Reading notes.

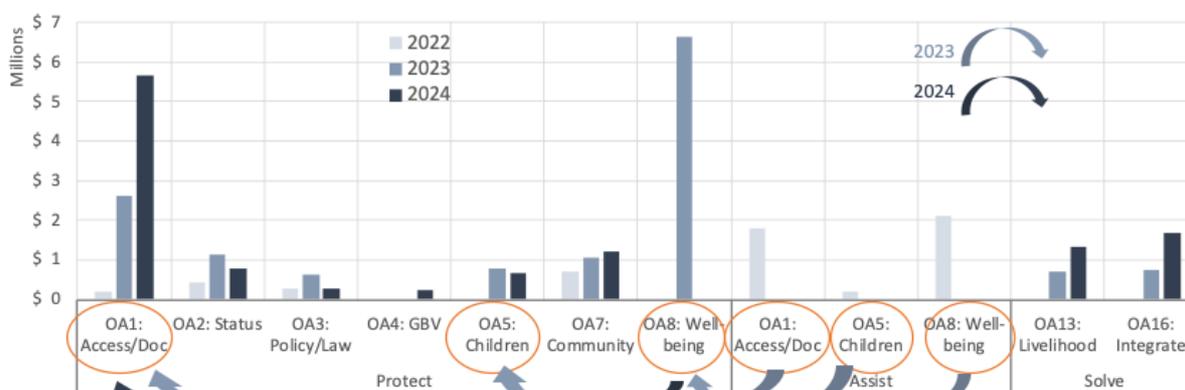
<sup>109</sup> Difficulties in documenting the transition from the OP to the OL (often centred around discussions and negotiations between the Regional Bureau and the country office), as well as the variations in the OL throughout the year (and the corresponding changes in budget, indicators, and targets), have been observed both in the present evaluation of UNHCR’s strategy in Bulgaria and in previous evaluations.

<sup>110</sup> See also evaluation question on sustainability.

allocated to Outcomes *Access/Doc* and *Well-being*, to registration activities, cash transfers (CBI), and the distribution of winter kits, with an implementation rate close to 100%.

2. **Refocus on inclusion, yet assistance remains predominant:** the needs-based budget (OP) for 2023 reached US\$19.3 million, with 74% covered (US\$14.3 million)<sup>111</sup> and entirely spent. In 2023, the operation structured its planning around two impact areas: *Protection* (IA 1) and *Solutions* (IA 4), with 69 % and 31 % of the needs-based budget (OP) respectively. Nevertheless, only 24 % of the resources planned for IA *Solutions* were funded, compared with 97 % for IA *Protection*. Notably, the *Well-being* Outcome (which felt under the *Assist* Impact Area in 2022) accounted for 39 % of the total OP budget and 46 % of the total available funds (OL), confirming the still considerable weight of assistance.
3. **A consolidation-contraction phase in 2024, resulting in available funds stabilising at US\$11.9 million (-17% relative to 2023):** As in 2023, the available funds (OL) were divided between two impact areas: *Protection* (IA1) and *Solutions* (IA4), which absorbed 74% and 25% of the OL respectively. 70% of the needs-based budget (OP) requested for these two impact areas was funded, with a sharp increase of 108% for IA 4 *Solutions* and, conversely, a decrease of 31% for IA 1 *Protection*. In total, 48% of the total available funds (OL) were allocated to the OA 'Access to territory, registration and documentation', and almost half of this amount (46%) was disbursed in the form of cash assistance, which had been recorded in 2023 in the OA 'Well-being' of the *Protection* impact area. Finally, the downsizing of the operation commenced in September 2024, following corporate directives.<sup>112</sup> This entailed a 60% reduction in staff and a 40% reduction in activities for 2025, with the transfer of *Compass Centres* to municipal budgets that have yet to be secured.

**Figure 9 Evolution of available funds (OL) by impact area & outcome and adjustments of the results chain - 2022-2024**



Source: UNHCR Bulgaria Budget\_Download (2022-2024)

102) The CO budget has been hampered by several constraints:

- **Constraints related to financial contributions:** In 2022, a massive influx of funds allowed for rapid expansion of activities but also created dependence on temporary, non-sustainable resources (UNHCR, 2022c). At the beginning of 2023, the gradual reduction of emergency funds prompted the CO to refocus its priorities, reduce the number of funded partners (from nine in 2023 to seven in 2024), and scale back certain interventions<sup>113</sup> such as in-kind assistance.<sup>114</sup> The structure of financial contributions also shifted: between 2023 and 2024, the share of unearmarked funds fell (-11%)<sup>115</sup>, reducing operational flexibility (UNHCR, 2023c, 2024b). In 2024, more than 50 % of the

<sup>111</sup> By the end of January 2023, USD 7.4 million in funds had been secured. In March, three donors - PRM/USA, DG-HOME and Japan Supplementary Budget - released a further US\$6.2 M. These amounts increase budget coverage from 38% to 70%.

<sup>112</sup> Annual Result Report 2024 and key informant interviews.

<sup>113</sup> See also the "Relevance" and "Effectiveness" sections of the report, which provide detailed analysis of how the progressive reduction in funding required the UNHCR Bulgaria to prioritise and adjust its programmes and funded partners.

<sup>114</sup> Between 2023 and 2024, beyond shifts in budget allocations across outcomes (CBI under OA8 in 2023 and OA1 in 2024), cash assistance was reduced by 56% (source: Bulgaria\_Budget\_Download\_2023-2024).

<sup>115</sup> Bulgaria CO Funding Updates 2021-24.

budget was implemented through local partners, increasing dependence on their management capacity and necessitating stronger internal controls. Access to European funds—particularly the Asylum, Migration and Integration Fund (AMIF)—channelled through public administrations appeared to offer an opportunity to diversify the financing of partner organisations, which played a key role in implementing UNHCR's strategy. However, effective access to this funding was constrained by administrative and institutional barriers. Finally, diversification of funding sources (e.g. private funds, local fundraising) remained limited—despite increased efforts in 2024<sup>116</sup>—reducing the CO's capacity for medium-term planning and affecting the continuity of interventions (UNHCR, 2024b)<sup>117</sup>, which is particularly important for socio-economic integration.

- **Implementation delays influenced by the nature of financial contributions and the administrative and political context.** Emergency funding, although substantial in 2022, was often allocated for short periods, requiring rapid—sometimes rushed—execution, which led to absorption challenges, and delays in contracting with partners. In 2023 and 2024, resource reductions caused delays in launching new projects and even the cancellation of some planned activities.<sup>118</sup> Administrative approval times and the need to adjust action plans based on actual available funds, also contributed to longer implementation timelines. Moreover, the absence of allocated public budget and the need to renegotiate contributions with donors each year generated uncertainty<sup>119</sup>, limiting the CO's financial stability and its capacity to ensure smooth, sustained responses.
- **Internal control limitations:** The OIOS 2023 audit report suggests that limitations in control systems may have affected the implementation of certain programmes in 2021 and 2022 (e.g. CBI). However, in 2024, the CO successfully implemented all the auditors' recommendations, introducing measures to enhance operational efficiency and control.

103) **Budget constraints are accompanied by frequent adjustments to the results framework, making it difficult to ensure alignment between budget allocations, planned results, and indicators. These factors make it difficult to measure the effort made by the operation in carrying out activities through the results-based monitoring framework.** As part of its results-based management and annual planning, the CO had to revise its structure of impact and results areas for the period 2024-2026. In 2023, at the request of the RBE, the "Empower" impact area was removed as a non-priority in Europe, and the "Basic Needs" OA disappeared from the plan while retaining the same funds and activities, now relocated under OA 1 "Access". Thus, the "Basic Needs" component still appeared in the Interim Strategy 2023 and the draft MYP 2024, before being removed from the final document, resulting in an adaptation of the theory of change and results chain. At the same time, the CO faced significant difficulties in managing indicators: UNHCR corporate guidelines on the "core" impact and outcome indicators were evolving, and the operation underwent several internal transitions. In addition, the absence of a global repository of standardised output indicators within UNHCR until 2023 further complicated the task. However, the adoption of corporate 'core' output indicators by the CO in 2024 was a decisive step in harmonising and reinforcing the consistency of the monitoring system and country planning.

As noted above, the overall funding reductions in 2025 have had a significant impact on UNHCR Bulgaria operation, further limiting its resources and capacity to respond to the needs. These reductions occurred during the first half of 2025, coinciding with the conduct of this evaluation. The resulting uncertainty has complicated planning efforts and hindered the formulation of recommendations, which are based on retrospective findings and an operational and financial context (2022–2024) that differs markedly from the current situation.

---

<sup>116</sup> In 2024, US contributions accounted for 78% of contributions, compared to 94% in 2022 (source: Bulgaria CO Funding Updates 2021-24).

<sup>117</sup> Key informant interviews.

<sup>118</sup> According to the 2023 and 2024 Annual Result Reports, some examples of activities that were postponed or cancelled include:

- Cancellation or postponement of distributed material aid (NFI) and certain specialised training courses.
- Delay or suspension of local integration, social housing and community tasks.
- Limitation or cessation of specialised services (GBV prevention, child protection) due to lack of multi-year funding.
- Difficulties in accessing social protection despite needs, due to complex procedures and lack of human resources.

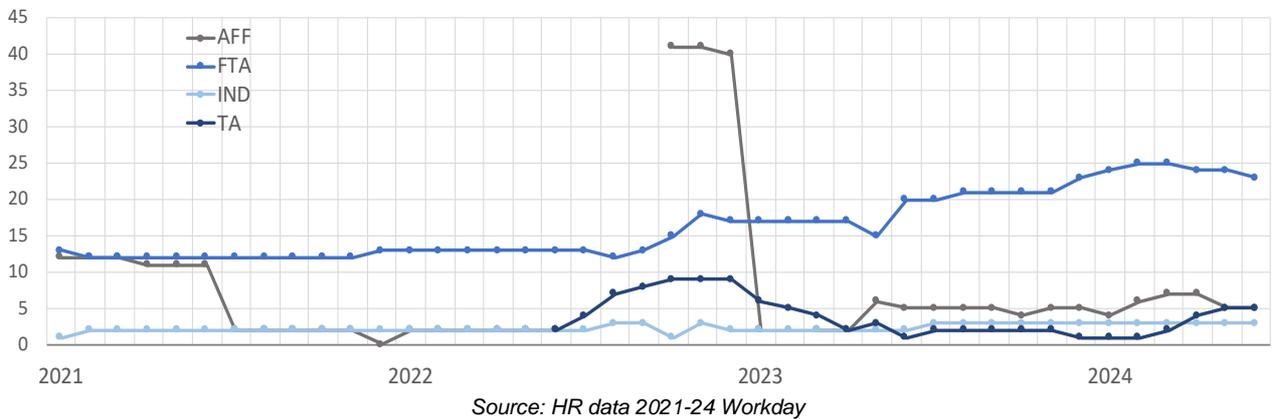
<sup>119</sup> In the absence of state funding, essential refugee services—including integration, social assistance, housing, and specialised protection—remain vulnerable to disruption and discontinuity. Since funding had to be renegotiated with donors each year, service delivery was disrupted at some moments, leading to delays and a lack of sustained continuity (UNHCR Annual Results Reports 2023–2024; key informant interviews).

Country office workforce

104) **Between 2021 and 2024, UNHCR Bulgaria demonstrated remarkable workforce agility, rapidly scaling its operation in response to the Ukraine crisis and establishing critical service infrastructure; however, constraints—such as immigration procedures, salary gaps, protracted recruitment processes, staff turnover, persistent vacancies in key technical roles, and recent downsizing—have undermined continuity and weakened institutional capacity.** In a short period of time, UNHCR CO transformed from an operation based on advocacy and technical expertise until 2021, into one with emergency response capacity and extensive logistical and programmatic deployment. However, the ability to optimise the operation's human resources has been influenced by contextual factors, such as waiting times for international staff visas, the wage gap between UNHCR and the labour market, and national labour law requirements (see below for more information).

105) The available figures show a 207% growth in the operation's workforce between January 2021 and December 2024 (Figure 10), with a peak in the second half of 2022 in response to the displacement of the Ukrainian population. During this period, human resources management passed through differentiated phases, each driven by specific operational demands and budget constraints. At the end of 2021, the office still had only 15 posts—13 on short-term contracts—and several specialised positions were already vacant.<sup>120</sup>

**Figure 10. Monthly evolution of workforce by type of contract - 2021-2024<sup>121</sup>**



106) With the peak of the Ukrainian influx in March and April 2022, a "surge package" was implemented. In less than six weeks, 9 Temporary Appointment (TA) staff and 41 UN Volunteers were recruited to open six *Blue Dot Centres* across the country, bringing the total staffing to 66. Priority was given to registration and immediate assistance, particularly at borders. However, bureaucratic hurdles, notably the procedures for obtaining visas for international TAs (averaging 45 days), prevented some crucial recruitments, such as GBV and data profiles, forcing the CO to make ad hoc arrangements with day-to-day staff, often without the right profiles.

107) The operation transitioned from the Blue Dots model to *Compass Centres* (1 January 2023, as part of the shift towards inclusion). Since then, these centres have operated as multi-service counters and continue to receive approximately 4,000 visits per month. An OIOS audit conducted in May 2023 (OIOS and UNHCR, 2023) identified an average salary gap of -19% between the UN salary grid and the Bulgarian labour market, contributing to an annual staff turnover rate of 21%. Although a general salary increase of +20% (May 2023), followed by an indexation of +6.2% (April 2024), helped reduce turnover to 13%, several essential functions remained without dedicated staff or reassignment. Data management, human resources, protection, logistics (supply) and CBI were particularly affected (UNHCR, 2023c, 2024b).<sup>122</sup> While the salary review has contributed to partial stabilization, the loss of institutional memory has affected programme continuity and

<sup>120</sup> In 2021, certain positions were vacant, such as GBV (gender-based violence) specialists and data-managers.

<sup>121</sup> This data does not reflect the variation within each year, as seen in other Workforce files. This variation is important to see real dedication throughout the year, contract stability, etc.

<sup>122</sup> Key informant interviews.

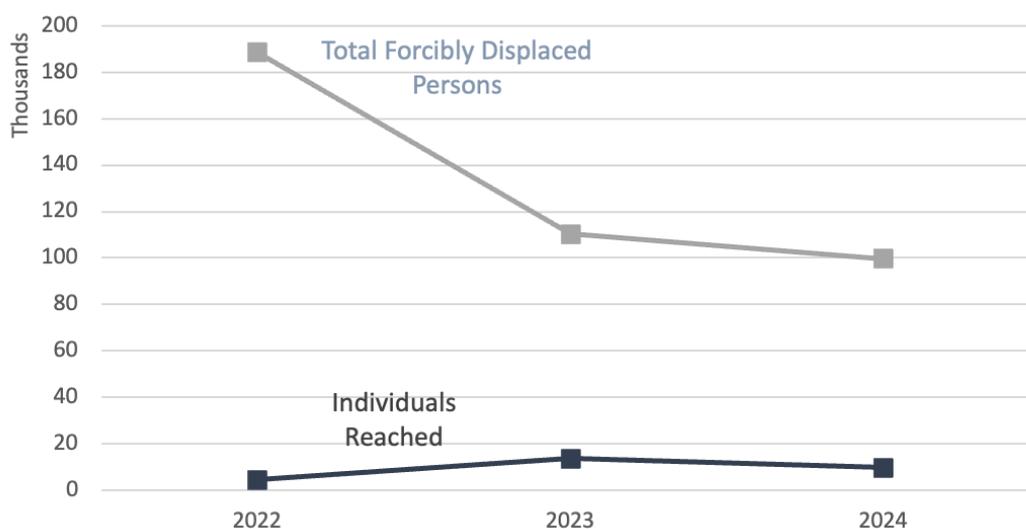
limited operational capacity in key areas.<sup>123</sup>

108) From 2024 onwards, a reduction in available funds led to a process of downsizing the operation's resources and capacities. A budget reduction plan validated on 15 September 2024 approved a 40% reduction in activities, effective January 2025. This downsizing resulted in a team of 25 staff—primarily national—refocused on advocacy and European fundraising. The reorganisation also entailed the discontinuation of GBV, data, and monitoring and evaluation functions, and led to the departure of six managers during the final quarter of 2024.

#### SQ 4.3. How efficiently has UNHCR deployed its Cash-Based Intervention Programme?

109) **Between 2022 and 2024, the CBI programme expanded its coverage, reaching a larger number of vulnerable households.** In 2022, during the adaptation phase to the growing influx of refugees, CBI transfers benefited 4,321 individuals in 2,312 households (2% of forcibly displaced and stateless persons). By 2023, once the operation had stabilised, coverage had expanded to 13,608 people (12% of forcibly displaced and stateless persons); then, in 2024, during the contraction phase, it dropped to 9,696 people in 4,434 households (representing 10%) (see Figure 11 below). By 2022, CBI's eligibility criteria covered a wide range of vulnerabilities, including the elderly, people with disabilities, at-risk households, and those facing serious medical conditions. In 2023, the criteria were extended to include pregnant women, in line with the needs identified in UNHCR participatory assessments. In the same year, the CBI strategy transitioned from a system of one-off transfers to a mechanism of monthly transfers over a four-month period, ensuring ongoing support to meet basic needs.

**Figure 11. Number of CBI recipients versus the total number of forcibly displaced and stateless persons.**



Source: Annual Results Reports (2022-2024); Population Statistics Reference Bulgaria (2021-2024)

110) **However, the changes to the CBI strategy adopted at the end of 2024 streamlined procedures and enhanced operational agility, while simultaneously presenting challenges for the consistent inclusion of vulnerable groups.** The Standard Operating Procedures (SOP) of November 2024 reduced the eligibility criteria to just three: the household dependency ratio, the presence of at least one specific need, and households composed solely of people over 60. This simplification of the eligibility criteria, while aimed at better targeting, might exclude some highly vulnerable households.<sup>124</sup> In addition, a *lump sum* equivalent to 75% of the poverty line has been set per household, replacing the variable amounts previously adapted to household composition and needs, which limited the programme's adaptability to diverse needs.

111) **In 2024, the CBI programme began a shift towards social integration.** During this year, cash

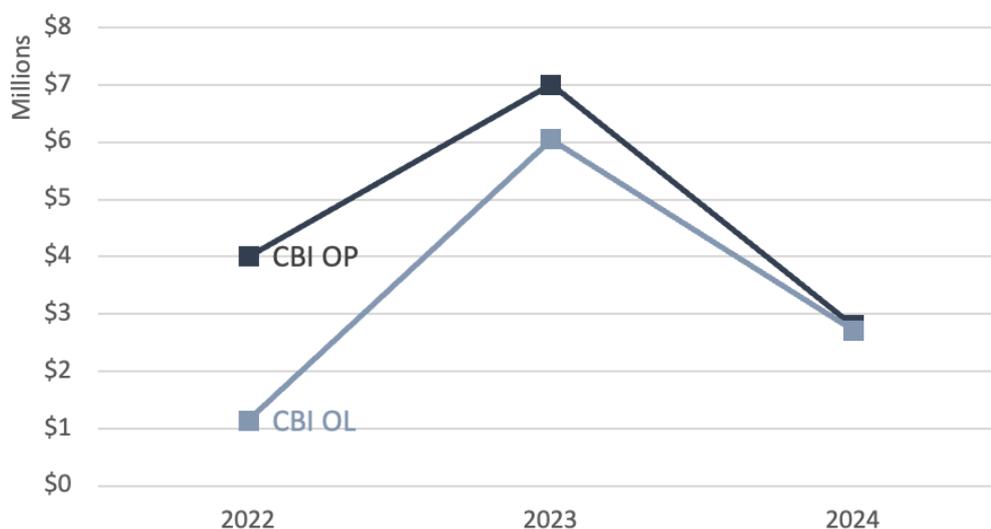
<sup>123</sup> In particular, the absence of a data manager led to 389 targeting errors in the cash assistance programs (CBI), while no beneficiaries of the GBV programme were registered out of the 1,000 planned.

<sup>124</sup> Partner project performance report and key informant interviews.

assistance was introduced to support access to primary, secondary, and higher education, in addition to traditional support in the form of multi-purpose cash assistance (MPCA) and winter assistance. Of a total of US\$2.4 million distributed via the CBI in 2024, 23% went to education (18% for primary and secondary education, 5% for higher education), while 77% was allocated to MPCA (34%) and winter assistance (43%).

112) **UNHCR has demonstrated the capacity to adapt and optimise its CBI budget** (see Figure 12 below). In 2022, the funds available (OL) for the CBI (US\$1.14 million) represented 28% of the OPS line, reflecting a significant gap compared to the planned needs. In 2023, allocations quadrupled to US\$6.05 million (54% of OPS line), reducing the gap with planned needs to just 14%. In 2024, although the budget was reduced to US\$2.71 million—a 55% decrease from 2023—the gap between projected needs and available funds narrowed to just 3%.

**Figure 12. CBI OP vs OL budget 2022-2024**



Source: UNHCR BUL\_DATA (OP-OL COMPASS)

113) **In addition to the strategic allocation of resources, the CBI programme has been distinguished by high operational efficiency.** Between 2022 and 2023, on average, 77% of the funds allocated to this intervention were directly transferred to beneficiaries. In 2024, the operation minimised its costs, enabling 87% of resources to be channelled into direct transfers. This reflects the programme’s capacity to maximise the use of available resources.

114) **The absence of a profile with solid technical expertise in cash transfers (CBI) for most of 2024 weighed heavily on programme management.** Distribution could only begin in the last months of the year, compromising the timetable and forcing the team to reuse the 2023 beneficiary register without adding new cases. Faced with this lack of local capacity, the RBE has provided ongoing support – field visits, technical reviews, reports – to fill operational gaps and ensure a minimum level of quality.<sup>125</sup> This external dependence, combined with implementation delays, and the non-updating of the register, has limited the programme’s coverage, increased the risk of errors (e.g. targeting, validation of payment methods), and highlighted its fragility.

<sup>125</sup> Key informant interviews.

## 2. Long-lasting effects of UNHCR support in Bulgaria

KEQ 5: How can UNHCR build on results achieved to date, current challenges, and opportunities, to further leverage its strategic position and influence within the country and region to advance collective efforts towards protection and solutions? (sustainability)

115) While many of UNHCR's initiatives in Bulgaria were launched in response to urgent needs, they have also revealed potential pathways for embedding protection within national systems. Although still at an early stage, experiences such as the operationalisation of Compass Centres and collaboration with municipalities offer initial lessons that can inform the development of more institutionalised and locally led responses yet the essential conditions for their integration and continuity within public services have not been established. To sustain these gains, UNHCR is well-positioned to shift from direct service delivery to a more strategic enabling role, supporting system-building efforts in areas such as reception capacity, local integration, and national planning mechanisms even within a complex socio-political environment.

116) The implementation of the EU Pact presents a timely opportunity to consolidate UNHCR's strategic influence within evolving governance structures. The organisation's contributions to legal and policy reform in Bulgaria, alongside its role in facilitating cross-sectoral coordination, provide a strong foundation. However, leveraging this position will require UNHCR to stabilise internal expertise, ensure continuity in technical engagement, and advocate for coherent linkages between emergency response mechanisms and long-term integration strategies.

SQ 5.1 How sustainable are UNHCR Bulgaria's MYS and annual strategies, specifically with regard to strengthening the state refugee reception capacity and building a sustainable and national inclusion/integration programme?

- 117) **The sustainability of UNHCR-supported interventions in Bulgaria is grounded in its efforts to promote coordination, complementarity, and partnerships with government institutions, local authorities, and civil society actors.** Strategic coordination is reinforced through MoUs with key governmental bodies and municipalities, laying the groundwork for more sustained collaboration. However, despite UNHCR's consistent advocacy, the limited political commitment and dedicated budgetary allocations for long-term refugee inclusion continue to undermine the sustainability of these efforts. Additionally, systemic changes in refugee reception and integration are inherently a long-term process that extends beyond the scope and timeframe of the current MYS (2024–2026). Although the Programme for Humanitarian Support incorporated the concept of integration by 2025, Bulgaria still lacks a coherent National Integration Programme for refugees<sup>126</sup>, reflecting both political instability and prioritisation of other national policy agendas, such as Schengen accession, Eurozone entry, and economic stability. There are also opportunities such as the National Implementation Plan and the National Strategy on Migration and Asylum, as well as the EU political interest in mitigating secondary movements.
- 118) At the municipal level, MoUs with six cities have created enabling conditions for localised service provision (as mentioned in SQ3.3) *Outcome Area 16 – Local integration and other local solutions* Yet, the sustainability

<sup>126</sup> The SAR ran a successful National Programme for Refugees' Integration from 2005-2013 funded by the State and designed for around 1,000 people. This Programme comprised an initial adaptation step applied during RSD (with access to reception centres, education and employment, language training) followed by access to the Integration Programme for successful Asylum / International Protection applicants (with access to a wide range of social and economic government services including those managed by the MLSP, but applicants had to move to private accommodation or apply for social housing under the MLSP). This National Integration Programme has not been operating since 2014. In 2017, Bulgaria adopted the Integration Ordinance on the conditions and rules for concluding, implementing, and terminating integration agreements—a legal instrument enabling the integration of persons granted international protection through the involvement of local authorities and the regional structures of various state institutions. However, the programme remains non-functional due to the absence of a state budget, the lack of a coordinating body, and insufficient expertise and coordination between the SAR and local governments.

of these services (particularly those developed through *Compass Centres* and pilot initiatives<sup>127</sup> led by NGOs or partners) largely depends on several factors, which are not in place (i.e. strengthened local ownership, the existence of clear transition or hand-over strategies, the integration of case management and referral mechanisms into municipal services, and the formal recognition of funded partners within national legal and administrative frameworks as service providers). The absence of a comprehensive integration strategy limited institutional capacity and public funding, and societal resistance continue to hinder efforts to strengthen municipal leadership in local responses.

**119) The lack of comprehensive planning at the design stage, including exit strategies and institutional linkages, poses a significant risk to the long-term viability of *Compass Centres* and similar service models.**

The rationale for the transition from Blue Dots to *Compass Centres* under Municipal Services for Refugee Inclusion and Integration was grounded in the optimisation of resources and the pursuit of sustainability. This shift was driven by the need to establish longer-term solutions that promote the inclusion and integration of refugees within Bulgarian communities; to enhance coordination among various actors; to support a municipality-led model fostering a more collaborative approach; and to address the high operating costs of the Blue Dots, making it necessary to optimize resources and ensure sustainability. The intention was to engage local municipalities and the broader community in fostering a greater understanding and inclusion of refugees (UNHCR, 2023g). UNHCR engaged in discussions with municipalities to identify available resources and premises. However, in practice, at least three *Compass Centres* remained in rented premises at the time this evaluation took place. Although MoUs were signed, municipal involvement remained largely declarative. There had been discussions between the RBE and UNHCR CO around launching “pilots” in selected municipalities (both linked to the *Compass Centres* and other initiatives). Still, these pilots were not adequately planned, documented, or tested for scalability. There is no institutional home or designated lead government agency responsible for integration programming, and current efforts (e.g. *Compass Centres*, municipal partnerships) are thus not anchored in state systems. Beyond ongoing negotiations with municipalities, opportunities for strengthening the roadmap to sustainability were identified, particularly in ensuring integration into organisational systems, securing funding stability, gaining stakeholder support, and maintaining the continuity of intended outcomes. For example, enhancing partner capacity and progressing toward licensing as service providers could facilitate the inclusion of pilot services in municipal requests for state-delegated services and their registration within the national portfolio of services. Such steps would increase the likelihood of integrating these initiatives into existing systems and securing long-term funding sources.

**120) UNHCR is in the early stages of advancing socio-economic inclusion, but the foundational design could have more strongly embedded elements that enhance long-term sustainability and government ownership.**

A key enabler of sustainability has been UNHCR’s investment in the development and capacity building of grassroots and refugee-led organisations. These organisations, mainly current or ex-funded partners, have enhanced local relevance and community service delivery. However, annual partnership agreements in 2022 and 2023, as well as shifts in strategic priorities have hampered the ability of local partners to plan for and invest in sustainable systems, including staff retention, infrastructure, and application of learnings and best practices. In a context of diminishing global funding envelopes and shifts in donor priorities, UNHCR is proactively exploring alternative sources of support, including private sector engagement, access to EU structural funds<sup>128</sup> and delegated funding mechanisms through partnerships with municipalities and civil society. However, such efforts require additional investments in capacity building, strategic advocacy, and technical support to enable local actors, particularly municipalities, to design, access, and manage EU-funded projects effectively. Private sector partnerships, while identified as a key pillar in fostering socio-economic inclusion, remain limited in both scale and strategic depth. While recent efforts, such as links with chambers of commerce, indicate emerging potential, they have yet to translate into tangible

---

<sup>127</sup> E.g.: preparatory programmes and catch-up/literacy classes, including through piloting preparatory classes in collaboration with the Municipal Personal Development Centres; extracurricular educational activities, varying from supplementary school support to preparational exams and language classes to recreational and cultural activities for both children and their parents.

<sup>128</sup> The 2021–2027 Programme of the Republic of Bulgaria under the EU Asylum, Migration and Integration Fund (AMIF) outlines support across four specific objectives of the fund. Investments are directed toward the efficient and coordinated management of migration, with a focus on replacing unsafe and irregular migration routes with secure and legal pathways into the European Union. Key areas of investment include the development of a stable reception and accommodation system, a robust asylum system for granting international protection, and an effective return mechanism for individuals who do not or no longer meet the criteria for legal stay in the EU. In light of the activation of Article 5 of Directive 2001/55/EC, persons granted temporary protection are included as an eligible target group under the Bulgarian AMIF Programme for 2021–2027. Notably, integration efforts under the Programme are concentrated on the early phases of the process—up to the point of inclusion of third-country nationals in the education system, labour market, and health services.

and scalable employment or vocational training pipelines. The absence of a comprehensive engagement strategy with the private sector limits the scalability and institutionalization of employment and self-reliance programs.

**SQ 5.2. To what extent is UNHCR Bulgaria equipped to engage effectively on the EU Migration and Asylum Pact implementation, including on ensuring the maintenance and sustainability of protection for refugees and asylum seekers in Bulgaria**

- 121) **UNHCR is strategically positioned to support the implementation of the EU Pact in Bulgaria; however, sustainability depends on reinforced state ownership and system integration.** UNHCR has played a key role in shaping national transposition efforts, specifically the conversion of EU directives into national law and policy frameworks. It has been able to contribute substantively to the drafting of the National Implementation Plan and the revision of national legislation,<sup>129</sup> including amendments to the Law on Refugees. The EU Pact also reaffirms UNHCR's supervisory role by formally granting it access to asylum-seekers, relevant information, and procedures.<sup>130</sup> UNHCR's recognised mandate and supervisory role under Article 6 of the Asylum Procedures Regulation provides a strong legal and operational foundation for continued engagement.<sup>131</sup> UNHCR has also been instrumental in establishing and supporting the TWG (with the Border Police and the Bulgarian Helsinki Committee (BHC)), and has invested in the institutional supporting of the Ministry of Interior over several years. Importantly, UNHCR is well positioned to support the monitoring mechanism of the National Implementation Plan by developing clear and detailed protocols for monitoring activities, data collection, interviews with refugees and migrants, inspections of border facilities, and by establishing a secure and accessible channel for reporting alleged violations of fundamental rights, ensuring confidentiality and protection from retaliation for all complainants (UNHCR, 2024I). Engagement with partners (including funded partners, UN) reinforces its central role (UNHCR, 2024m). However, at present, there is a risk that without reinforced state collaboration and the integration of mechanisms within institutional frameworks and wider civil society engagement, current efforts may remain overly reliant on UNHCR and its funded partners.

---

<sup>129</sup> Examples: UNHCR, UNHCR preliminary comments on the establishment of independent national monitoring mechanism in Bulgaria, (UNHCR, 2024I); UNHCR preliminary comments and observations concerning provisions affecting provision of legal counselling, assistance and representation for the National Implementation Plan of Bulgaria of the EU Pact on Migration and Asylum, (UNHCR, 2024m).

<sup>130</sup> Regulation (EU) 2024/1348 of the European Parliament and of the Council of 14 May 2024 of 14 May 2024 establishing a common procedure for international protection in the Union and repealing Directive 2013/32/EU, Article 6 The role of the United Nations High Commissioner for Refugees. It provides for UNHCR's access to asylum-seekers and refugees in reception centres and detention and at the borders and transit zones, referring that UNHCR should "have access to information on individual applications for international protection, on the course of the procedure and on the decisions taken, subject to the consent of the applicant; and should be able to present its views, in the exercise of its supervisory responsibilities to any competent authorities regarding individual applications for international protection at any stage of the procedure".

<sup>131</sup> Implementation plan in the Republic of Bulgaria of the European Union Pact on migration and asylum, 12 December 2024 – 12 June 2026, aim 8, 9 and 10.

## 4.4 Lessons Learned

- 122) **Dual-track positioning to sustain protection at EU external borders:** UNHCR's added value in Bulgaria lies in its mandated protection role, its ability to generate independent evidence, and its capacity to bridge gaps between state obligations and rights-based responses, particularly when national systems tend toward securitised or fragmented approaches. Maintaining this positioning, however, requires more than formal access: it demands consistent political engagement, adaptive partnerships, and strategic visibility to navigate the evolving dynamics of EU-influenced migration policies. UNHCR's strategic positioning has relied on a dual-track approach: combining formal agreements with key national institutions and municipalities, while working closely with civil society organisations, funded partners and other stakeholders. This model has enabled UNHCR to secure legitimate access and influence in sensitive areas such as border monitoring, detention, and RSD, while also advancing the agenda for the socio-economic inclusion of refugees at the local level.
- 123) **AGD commitments:** While UNHCR promoted AGD through participatory assessments and some disaggregated data, gaps in disability, gender and diversity data, partner reporting, and limited follow-up on AGD-specific recommendations weakened the systematic application of AGD as a cross-cutting lens. Data collected through structured assessments enabled UNHCR to ground its advocacy in evidence, even if gaps in data coverage remain. The use of robust data systems and stronger operational integration of AGD principles is essential to ensuring more consistent use of findings to inform programme design and implementation.
- 124) **Emergency response:** Past emergencies, including the 2013–2014 Syrian influx, and the current Ukraine crisis, underscored the critical value of timely preparedness, UNHCR's technical support, and coordinated response mechanisms. The use of real-time data on flows, solidarity platforms at the EU level, and support to the government were instrumental in ensuring access to protection, services, and infrastructure.
- 125) **Multi-level advocacy approach:** In a context of political instability, UNHCR has adopted a multi-level advocacy approach to enhance continuity and impact. By increasing engagement with Parliament, where members offer greater stability across administrations, and leveraging diplomatic channels (such as joint actions with embassies and EU-level advocacy) UNHCR has been able to maintain dialogue and influence policy.
- 126) **Evidence-informed public engagement strategy:** Conducting a public opinion poll prior to launching the UNHCR "Food for Thought" campaign proved essential for shaping an effective communication strategy. The poll revealed a large undecided segment of the population, which informed the campaign's focus on this group rather than on more entrenched negative views. Grounded in the insight that most people had never met a refugee, the campaign used personal stories and cultural connections (like food) to "humanise" refugees and challenge stereotypes. Strategic media partnerships and a strong digital presence amplified reach without significant financial investment. The campaign generated increased interest from new sectors, highlighting the value of data-driven messaging and relatable storytelling in shifting public narratives.

# 5 CONCLUSIONS

## 5.1 Strategic level

**C1) Adaptive strategy - UNHCR CO has demonstrated agility in adapting its strategy to the evolving context in Bulgaria, significantly expanding its role after 2022 in response to the Ukraine crisis and shifting from an advocacy-centred approach to one encompassing assistance, protection, and solutions for forcibly displaced and stateless persons.** This adaptive posture allowed UNHCR to make an important contribution in supporting the Government of Bulgaria's response and to broader protection efforts. It should be stressed that UNHCR cannot realistically cover all sectors or meet the needs of all population groups, both due to resource constraints and because states carry the primary responsibility for refugee response—including access to health, housing, and education. Within this context, UNHCR's role is to set clear priorities within its mandate, focus on areas where it has the greatest added value, and work through partnerships to complement state efforts. However, the evaluation highlights that despite this approach, and while programme design increasingly leveraged diverse evidence sources and participatory tools—enhancing accountability and inclusion—systematic integration of this evidence into strategic planning remained uneven. Disparities remained insufficiently addressed for non-Ukrainian refugees, stateless persons, and individuals facing vulnerabilities such as GBV and disability.

**C2) Alignment - UNHCR's alignment with global and regional protection frameworks has enabled the practical implementation of the GCR, the EU's TPD, and the RRP. During the response to the Ukraine crisis, UNHCR's alignment with national priorities ensured a coherent response grounded in technical expertise and sustained institutional partnerships.** UNHCR's collaboration with the SAR, other national counterparts, and municipal governments contributed to mainstreaming refugee protection into state structures at multiple levels, laying the groundwork for the full integration of refugee services into municipal systems as frontline providers. UNHCR's influence in shaping legal and policy reforms (including the Law on Refugees) was enabled by its constructive diplomacy and convening role, though political volatility and inconsistent inter-agency coordination limited the effectiveness of its advocacy. UNHCR's alignment with the EU Pact is evident in its advocacy around Bulgaria's National Implementation Plan particularly in areas such as independent border monitoring, child protection, legal aid, and statelessness. Nonetheless, institutional and political constraints have hindered a more assertive advocacy to promote a rights-based asylum agenda.

**C3) UNHCR's role at EU external borders - UNHCR's CO in Bulgaria has leveraged its mandate in the Tripartite Border Monitoring Agreement with the Border Police and the BHC to support protection-sensitive access to territory at the EU's external borders.** UNHCR has played a significant role as evidenced by its contributions to discussions on the EU Pact, the development of the Bulgarian National Implementation Plan, and cooperation agreements with Frontex and other key stakeholders. The border monitoring capacities, expertise, and tools developed through the long-standing Tripartite Working Group with the Border Police have strong potential to be integrated into the newly established independent national border monitoring mechanism under the Ombudsman's office. However, UNHCR's engagement on non-refoulement and access to procedures along the Turkish-EU border was comparatively limited, partly due to increasingly limited resources and a strategic shift aimed at enhancing impact. This was evidenced by its less active participation in the Border Monitoring Working Group and limited evidence for monitoring in detention centres. Following this change of approach, UNHCR revised its training activities for Border Police personnel, focusing on skills development rather than knowledge transfer, and strengthen coordination with EU institutions (FRA, Frontex FRO). Despite these adjustments, the ongoing tripartite agreement and the evolving institutional landscape presented renewed opportunities for UNHCR to advocate for principled border governance, in line with the GCR and tapping into the complementarities with the GCM, thereby helping to counterbalance the prevailing security-driven approach within Bulgaria's migration governance.

## 5.2 Operational level

**C4) Coordination and complementarity - UNHCR has contributed to a more coordinated and coherent refugee response in Bulgaria through its leadership in sectoral working groups, bilateral engagement, and support to civil society and municipalities. These efforts have fostered complementarity and**

**technical collaboration among a diverse range of stakeholders working on protection and inclusion.**

UNHCR has played a central role in shaping coordination frameworks and mechanisms, leading the coordination of sectoral working groups under the RCM, and bringing together diverse actors to implement the Ukraine RRP. Challenges remain in ensuring structured, inclusive, and sustained coordination (particularly in promoting local ownership, institutionalising coordination mechanisms, and clarifying roles with other UN and EU agencies). Partnerships with grassroots and refugee-led organisations have enhanced local relevance and diversified service delivery but are subject to UNHCR's available funding in key areas. However, municipal engagement has been uneven, resulting in inconsistent local-level responses. Additionally, at times, limited internal coordination (across UNHCR's teams) has affected the coherence of engagement, especially with funded partners. Externally, political volatility, mixed institutional capacity, and the rapid emergence of new funded partners have required significant investment in capacity-building. While promising partnerships with the private sector and academia have emerged, they require deeper operationalisation to generate any solid results.

**C5) Refugee status determination and protection - UNHCR has made meaningful contributions to advancing protection outcomes in Bulgaria, particularly in areas such as access to asylum, legal aid, child protection, and community engagement. Through strategic partnerships, capacity-building, and advocacy, UNHCR has supported improvements in border monitoring, refugee status determination, and frameworks for refugee inclusion.**

Given the large scale of arrivals from Ukraine, the response understandably focused primarily on the needs of temporary protection beneficiaries. However, other groups (particularly non-Ukrainian asylum seekers and stateless persons) received comparatively less programmatic attention, despite often facing protection and inclusion challenges. Overall, Ukrainian nationals benefited from free access to territory and a facilitated status, while asylum-seekers, refugees, and stateless persons (largely from MENA countries) encountered border rejections, structural discrimination, and more limited access to rights and services. While UNHCR's approach for Ukrainians centred on operational support and service delivery in coordination with national and local stakeholders, its engagement for other groups relied more heavily on advocacy efforts to address systemic barriers. However, persistent gaps remained in addressing non-refoulement, ensuring procedural fairness in refugee status determination, and maintaining consistent capacity-building efforts, which are ultimately the responsibility of the GoB. These gaps coincided with a shift in UNHCR's approach: from open advocacy to more discreet channels of intervention, and reduced interaction with government actors, such as decreased participation in working groups, less visible interventions, and fewer training activities, which may explain why some partners perceived these issues as being relegated. UNHCR efforts in achieving results in protection have varied by area, with stronger results in sectors where expertise and capacity were more established (e.g. asylum, legal aid, child protection, community engagement) while others, such as health (including MHPSS) achieved weaker outcomes. Greater attention could have been paid to age, gender and inclusion (including for LGBTQI + individuals).

**C6) Socio-economic inclusion and integration - Efforts to promote socio-economic inclusion and local integration have gained traction through municipal and private sector partnerships, employment initiatives, and education support, yet remain constrained by limited employment programmes, administrative barriers, insufficient resources allocated at the municipality level, limited university admission quotas, and fragmented service delivery.**

UNHCR's support has focused on expanding access to employment-related services and resources for refugees and asylum seekers in the *Compass centres*, career centres, as well as via the Refugee Employment Platform. The centres provide critical information and guidance, but there are no formalised pathways that ensure systematic follow-up or integration into municipal or national service delivery frameworks. While some municipalities have actively promoted inclusion and integration, others have shown more limited engagement. *Compass Centres* are not embedded within municipal service portfolios or long-term planning frameworks but offer a promising avenue going forward.

**C7) Cash-Based Interventions - UNHCR's CBIs have provided immediate financial relief but have fallen short of advancing protection and fostering self-reliance.**

CBI has evolved from emergency response to more structured assistance, primarily targeting refugees from Ukraine. Between 2022 and 2024, cash assistance expanded its coverage, delivering immediate financial relief, reducing stress, and improving access to basic needs, particularly among women and younger recipients. However, its potential to contribute to broader protection outcomes and self-reliance remains underutilised. The 2024 shift to multi-month and multi-purpose cash assistance, including the expansion of winterisation and education grants, was a positive

step. While the refinement of eligibility criteria aimed to better target limited resources, some partners expressed that this approach could unintentionally overlook less visible yet highly vulnerable groups (e.g. GBV survivors or new arrivals (up to 2024) and undermine earlier gains in inclusiveness. Additionally, persistent gaps in targeting, weak referral systems and limited integration with national social protection and inclusion frameworks have constrained the achievement of more sustainable outcomes.

**C8) National capacities and ownership - UNHCR's efforts risk limited long-term impact without stronger integration into national systems. Sustainability depends on government ownership, scalable and integrated models, and clear transition strategies beyond short-term planning cycles.**

While UNHCR has laid important foundations through strategic partnerships, municipal engagement, and contributions to the EU Pact implementation, systemic change remains constrained by political instability, limited institutional capacity, and the absence of a national integration programme. UNHCR has taken initial steps toward advancing socio-economic inclusion; however, the development of these efforts was constrained by frequent political changes which complicated institutional continuity and long-term planning. While foundations were laid, opportunities remain to further embed sustainability within government systems (particularly through the integration of Compass Centres into municipal service portfolios, formalisation of socio-economic inclusion frameworks, and alignment of employment and education initiatives with national programmes, among others) to ensure stronger national ownership of these investments. The implementation of the current MYS, including support to the National Implementation Plan for the EU Pact, is increasingly challenged by reduced organisational and financial capacities, with several processes extending beyond the MYS timeframe. Some initiatives, such as the *Compass Centres*, have demonstrated value but risk remaining project-based without formal transition strategies or state-led frameworks for social protection.

### 5.3 Organisational level

**C9) Operational capacity - Between 2022 and 2024, while UNHCR's CO demonstrated an organisational structure capable of adaptive and rapid response, internal constraints nonetheless undermined its capacity to ensure coherence and sustainability of interventions.** The CO's structure supported flexible resource reallocation and timely responses, notably through mechanisms like the CBI programme and Compass Centres. Internally, fragmented responsibilities— sometimes leading to siloed work —along with over-reliance on temporary contracts and staff rotations, hindered coordination. Externally, donor dependence and underfunding in key sectors further constrained the CO's ability to implement its strategic vision. The resulting gap between ambition and capacity limited UNHCR's ability to demonstrate the sustained impact of its protection and inclusion efforts.

**C10) Results-based management performance - Since 2022, UNHCR CO's results framework has undergone successive adjustments to refine and refocus strategic objectives. Despite improvements introduced in 2024—at the corporate and country levels, including by UNHCR CO—some weaknesses in the alignment between budget allocations, indicators, and expected results have undermined the operation's ability to consistently measure progress and performance, particularly between 2021 and 2023.** Although a harmonised monitoring framework, standardised core output indicators, and other changes were adopted in 2024, several technical functions remained without dedicated staff, and inconsistencies in data continued to affect results-based management. Furthermore, fragmented information systems, limited traceability of prioritisation, fluctuations in UNHCR CO's available funds throughout the year, and limited documentation of strategic shifts have constrained the analysis of performance and accountability.

## 6 RECOMMENDATIONS

The recommendations presented in this report focus on the strategic and operational levels of analysis, as outlined in the Inception Report. While the evaluation also generated findings related to workforce management, planning, monitoring, and the funding model, these primarily reflect organisational-level issues—particularly corporate systems that influence country-level operations. Although not the core focus of country strategy evaluations, such findings address the evaluation’s objective to assess the alignment and adequacy of UNHCR’s internal capacities and processes, and how they contribute to broader insights on efficiency. Given the timing of the evaluation, during a period of budgetary constraints and corporate-level reforms, UNHCR and the evaluation team agreed not to issue recommendations on organisational matters. However, these findings remain in the report, responding to the terms of reference and contributing to a growing evidence base that may inform future institutional reflection.

Complementarity and coordination		Priority	Timeframe	By whom
<b>R1</b>	<b>Transition to a structured, inclusive, and locally owned coordination mechanisms by enhancing internal coherence, where possible delineating responsibilities between UNHCR and other UN agencies, and further investing in long-term, strategic partnerships across sectors.</b>			
<b>Assumptions</b>	<ul style="list-style-type: none"> <li>▪ UNHCR will continue to play a central role in convening actors and facilitating coordination, whilst coordination is transitioning to others leads.</li> <li>▪ Partners will remain engaged and active despite funding uncertainties and changes in coordination mechanisms</li> </ul>			
<b>Risks</b>	<ul style="list-style-type: none"> <li>▪ Reduced operational presence may weaken UNHCR’s and other stakeholders’ ability to lead or participate in coordination platforms.</li> <li>▪ Short-term funding cycles and gaps in coordination may erode trust and continuity with partners.</li> <li>▪ Competition for limited resources may increase fragmentation among funded partners, including civil society, and UN agencies.</li> </ul>			
<b>Suggested actions</b>	<b>Where there are government commitment and interest, institutionalise coordination mechanisms (transitioning WGs)</b> by developing joint planning frameworks with government counterparts, municipalities, and civil society to ensure continuity and shared ownership, ensuring those WGs (co)-led by UNHCR have a smooth transition.	High	Short term	UNHCR Bulgaria with key stakeholders and leads of WGs
	<b>Further clarify roles and responsibilities</b> among UN agencies (UNICEF, IOM and WHO) and funded partners, and other key stakeholders through updated terms of reference, joint workplans, and regular strategic alignment meetings to reduce overlap and improve coherence.	High	Short term	UNHCR Bulgaria with key stakeholders, including other UN agencies
	<b>Further reinforce inclusive partnership models</b> by co-developing agendas with funded partners, expanding leadership-level dialogue, and ensuring meaningful participation of refugee-	High	Short term	UNHCR Bulgaria with key stakeholders, including funded partners

	led and grassroots organisations. This could be piloted in with a few key partners and expanded if it produces successful results.			
--	--	--	--	--

UNHCR's role at EU external borders		Priority	Timeframe	By whom
<b>R2</b>	<b>Strengthen support for protection-sensitive access to territory at the EU's external borders.</b>			
<b>Assumptions</b>	<ul style="list-style-type: none"> <li>▪ UNHCR will maintain its strategic position within the working groups with Border Police and Migration Directorate and use its advocacy leverage and trusted relationships with key stakeholders.</li> <li>▪ Government and key stakeholders will be open and engage in application of protection sensitive border policy.</li> <li>▪ Government institutions, UNHCR, and other relevant partners will maintain effective coordination and joint working mechanisms and will have the capacity and commitment to translate agreed policies into practice.</li> <li>▪ UNHCR will be able to grasp new advocacy opportunities to harmonise global humanitarian principles in the midst of application of the new EU Pact procedures (screening and border procedures) and the ongoing legislative amendments in Bulgaria.</li> <li>▪ UNHCR will maintain and strengthen coordination with EU agencies – EUAA, FRA, Frontex.</li> </ul>			
<b>Risks</b>	<ul style="list-style-type: none"> <li>▪ Reprioritisation due to other emerging needs</li> <li>▪ Stronger security-based focus (national and EU policies)</li> <li>▪ Insufficient capacity of CO for engagement through working groups, participation, training, and monitoring.</li> <li>▪ Limited coordination with EU institutions to be able to influence political will</li> </ul>			
<b>Suggested actions</b>	<b>Maintain a calibrated presence in the Border Monitoring WG focused on specific protection priorities</b> (e.g., non-refoulement safeguards and referral pathways) while acknowledging current limitations within the WG. Scale field-level capacity-building with EU partners where this adds clear value.	High	Short term	UNHCR Bulgaria and tripartite stakeholders
	<b>UNHCR to collaborate with the Ombudsman Office in the process of establishment of the new INMM to enhance its institutional capacity</b> , particularly by supporting the development of monitoring tools that align with UNHCR's protection standards. These tools should promote transparency and accountability and facilitate the practical application of the EU Pact on Migration and Asylum, as well as Bulgaria's National Implementation Plan.	High	Medium / long term	UNHCR Bulgaria with key stakeholders
	<b>Promote protection-sensitive border governance and prevent human rights violations in the context of asylum detention.</b> Sustain and strengthen efforts to prevent and respond to rights violations at borders by coordinating with EUAA and Frontex to identify and implement promising practices—particularly those that enhance communication, accountability, and timely response to search and rescue and distress situations. <sup>132</sup> Leverage alignment with EU frameworks, including the EU Pact, and Bulgaria's National	High	Short / medium term	UNHCR Bulgaria, Frontex, BP

<sup>132</sup> Tripartite Working Group, 2024 First Quarterly Session, 14 February 2024, Recommendations.

	Implementation Plan, to advocate for inclusive and rights-based asylum policies.			
--	--	--	--	--

Protection outcomes		Priority	Timeframe	By whom	
<b>R3</b>	<b>Ensure the sustainability of protection outcomes by embedding services for refugees, asylum-seekers, and stateless persons within national systems and by fostering long-term institutional ownership and accountability.</b>				
<b>Assumptions</b>	<ul style="list-style-type: none"> <li>▪ UNHCR will continue to advocate effectively for national integration frameworks.</li> <li>▪ Effective delivery of UNHCR’s programme in Bulgaria depends on ongoing support from stakeholders, even in a context of reduced funding and political will</li> </ul>				
<b>Risks</b>	<ul style="list-style-type: none"> <li>▪ Political instability may delay or derail policy development and absorbing UNHCR’s former responsibilities/activities.</li> <li>▪ UNHCR’s reliance on short-term, project-based, and donor-dependent funding limits the ability to implement comprehensive, long-term protection strategies. Visibility and rapid results might be prioritised over systemic change, leading to fragmented programming and service delivery, and limited scalability. It also constrains UNHCR’s ability to plan strategically a comprehensive protection agenda.</li> </ul>				
<b>Suggested actions</b>	<b>Capitalise on existing efforts by further developing cross-sectoral UNHCR protection strategies aligned with national frameworks and public policies.</b> These strategies could cover areas such as gender-based violence and child protection, and serve as a basis for medium-term planning, coordination, and integration into national systems.	High	Short term	UNHCR (Protection)	Bulgaria
	<b>Address gaps between policy and implementation by supporting the new independent national monitoring mechanism with embedded accountability frameworks.</b> Provide targeted advocacy and technical assistance to ensure that ongoing legal reforms in asylum legislation are effectively translated into practice.	High	Short term	UNHCR (Protection)	Bulgaria
	<b>Building on existing efforts, UNHCR should leverage existing tools and data not only for situational analysis but also to systematically prioritise underrepresented groups (e.g. non-Ukrainian asylum seekers, stateless persons, persons with disabilities, survivors of GBV).</b> This would include recent asylum seekers from Ukraine, as well as smaller population groups such as non-Ukrainian asylum seekers, stateless persons, persons with disabilities and survivors of GBV. UNHCR could consider further disaggregating (by population group) MSNA’s and other representative surveys data to highlight the full range of needs present across population groups and to advocate with the Government of Bulgaria, donors, key UN partner agencies and funded partners for tailored programmes that respond to the needs of refugees, asylum-seekers, and stateless persons—especially those in vulnerable situations.	High	Medium term	UNHCR Bulgaria (Protection & Programmes)	
	<b>Continue strengthening the role of local and refugee-led organisations through sustained capacity-building and meaningful</b>	High	Medium term	UNHCR Bulgaria (Protection & Programmes)	

	<p><b>participation in policy dialogue.</b> Building on prior initiatives, UNHCR should invest in the institutional capacity of local and refugee led to ensure service continuity, improve quality, and foster community-driven solutions. UNHCR should continue to promote their active inclusion in decision-making spaces with public administrations to enhance their role in shaping and implementing public services and programmes. This will help elevate their contributions beyond service delivery, towards long-term ownership, influence, and sustainability</p>			
--	--	--	--	--

Socio - economic inclusion		Priority	Timeframe	By whom		
<b>R4</b>	<b>Support national and local authorities to institutionalise socio-economic inclusion efforts by embedding initiatives, such as the <i>Compass Centres</i>, into municipal service portfolios and medium-term development plans, while also broadening private sector and academia engagement.</b>					
<b>Assumptions</b>	<ul style="list-style-type: none"> <li>▪ Municipalities and civil society will continue to engage in refugee inclusion efforts, including generating services, mitigating barriers, and implementing policies for refugees of all nationalities</li> <li>▪ National institutions, including municipalities, will be able to identify legal mechanisms to formalise the existence of centres and services set up by UNHCR, as well as allocating stable funds for their ongoing operation.</li> <li>▪ UNHCR will continue to advocate effectively for national integration frameworks</li> <li>▪ A clear plan is in place for the handover of current components to local authorities and other stakeholders, ensuring adequate resourcing, a smooth transition, and long-term sustainability.</li> </ul>					
<b>Risks</b>	<ul style="list-style-type: none"> <li>▪ Reduced staffing and funded partners may limit UNHCR's ability to have an effective transitioning of the <i>Compass</i> centres and other initiatives</li> <li>▪ Without formal state frameworks, inclusion efforts, including the <i>Compass</i> centres, may remain fragmented and unsustainable.</li> <li>▪ Political shifts could deprioritise refugee inclusion, especially for non-Ukrainian populations.</li> <li>▪ National institutions may not be willing to involve civil society in national planning and coordination mechanisms, and to make decisions based on evidence and available data.</li> <li>▪ Without dedicated funding or mandates, municipalities may be unable to sustain services.</li> <li>▪ Loss of institutional memory due to staff turnover may weaken long-term planning and partnerships</li> </ul>					
<b>Suggested actions</b>	<p><b>Support the integration and institutionalisation of <i>Compass Centres</i> within municipal systems.</b></p> <p>This includes embedding the Centres into municipal service portfolios, formalising referral pathways, and co-developing sustainability and 'orderly transition' strategies with local authorities. To strengthen local ownership and long-term sustainability, the following actions should be promoted:</p> <p>i) securing institutional or political commitments and decisions;  ii) obtaining formal or administrative recognition of the services established by UNHCR within relevant public administrations; and</p>	High	Medium term	UNHCR municipalities RBE	Bulgaria and—support	with from

	iii) incorporating these formally recognised services into public budgets or appropriate public financing mechanisms.			
	<p><b>Enhance national ownership by continue to advocate for a state-led refugee integration programme with clear institutional leadership and sustainable funding.</b></p> <p>Advocate for the establishment of a lead government body responsible for refugee inclusion and promote the establishment of an inter-ministerial working group to coordinate integration efforts. Facilitate the development of sectoral initiatives across relevant ministries, ensuring clear institutional responsibilities, dedicated budget allocations, and alignment with the EU Pact and national social protection frameworks.</p>	High	Medium / long term	UNHCR Bulgaria with key stakeholders
	<p><b>Develop an engagement strategy for private sector and academic institutions to expand employment and vocational training opportunities for refugees and stateless persons.</b></p> <p>The strategy should focus on building long-term partnerships and promoting inclusive labour market access and training/education. It should also capitalise on successful initiatives (such as UNHCR’s work and data collected in Bulgaria, and programmes like the Welcome initiative in Italy) to demonstrate the cost-effectiveness and mutual benefits of private sector engagement in refugees and other forcibly displaced persons integration.</p>	High	Medium term	UNHCR with key stakeholders

## 7 APPENDICES

- Appendix 1** Terms of Reference
- Appendix 2** Evaluation matrix
- Appendix 3** Context
- Appendix 4** Methodology
- Appendix 5** Data Collection Tools
- Appendix 6** Key Informants Consulted
- Appendix 7** Qualitative Data: Key Informants, Data by Evaluation Question and Co-occurrence of Evidence
- Appendix 8** Evaluation Team Composition and Management of the Evaluation
- Appendix 9** Funded partners (Local NGO's) per Outcome Areas
- Appendix 10** Retrospective Reconstruction of the Theory of Change (ToC)
- Appendix 11** Overview: Cash-Based Intervention in Bulgaria
- Appendix 12** Cash-Based Interventions in Bulgaria: An Analysis of Post-Distribution Monitoring by UNHCR
- Appendix 13** Bibliography