

UNHCR Evaluation Management Response			
Evaluation title:	Country Strategy Evaluation BULGARIA 2022-2024		
UNHCR evaluation reference:	EVO/2025/18		
Entity that commissioned the evaluation:	UNHCR Evaluation Office		
Due date of Management Response:	31 March 2026		
Coordinator of Management Response:	Name: Mariya Shisheva	Job title: Assistant Protection Officer	Country/Office: Bulgaria
Management Response approved by (<i>senior manager in commissioning office</i>):	Name: Seda Kuzucu	Job title: UNHCR Representative	Country/Office: Bulgaria
Date:	19 February 2026		

General comments on the evaluation:	<p>The evaluation was conducted at a time when UNHCR's strategic priorities were undergoing significant adjustments in response to declining resources available to the Office and its partners. Nevertheless, the findings provide a sound basis for strategic programming in Bulgaria, particularly in informing the prioritisation of advocacy efforts and targeted investments aimed at ensuring the sustainability of existing structures and capacities.</p> <p>UNHCR remains committed to leveraging the EU Pact on Migration and Asylum, including through its collaboration with EU institutions, most notably the EU Asylum Agency, the Fundamental Rights Agency, and the Frontex Fundamental Rights Office, to advocate for further reforms to align Bulgaria's entry and asylum systems with the Common European Asylum System. These efforts will be grounded in evidence generated through UNHCR's monitoring mechanisms. Subject to the availability of resources in Bulgaria, UNHCR will continue to provide technical support, including legislative and regulatory inputs, as well as capacity-building assistance.</p> <p>During the 2026–2027 period, UNHCR will prioritise support for the establishment of an independent monitoring mechanism, the introduction of systematic vulnerability screening, the development of child-friendly asylum procedures, and improvements in the availability and quality of legal assistance for all vulnerable applicants.</p> <p>UNHCR is further committed to the localisation of the Bulgaria Network of Compass Protection Centres, in partnership with municipalities, local organisations, and refugee-led organisations. These centres are envisaged as community-based one-stop center providing tailored protection and inclusion services, with the aim of strengthening community empowerment, social cohesion, and socio-economic inclusion. UNHCR's support to partners will focus on capacity-building; cross-sectoral and national coordination; and targeted advocacy and guidance to facilitate partner ownership and resource mobilisation through nationally managed funding mechanisms.</p>
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RECOMMENDATION 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.				
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):		[add only if partially agree or disagree was selected]				
Unit or function responsible:		UNHCR Bulgaria Country Office				
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	National ownership	UNHCR Bulgaria	Enhance efforts to institutionalise coordination mechanisms (transitioning WGs) 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.	31 December 2027	Ongoing	Given the current context, efforts to institutionalize coordination mechanisms continue to be intermittently interrupted.
2	Reinforce inclusive partnership models	UNHCR Bulgaria	Further reinforce inclusive partnership models by co-developing agendas with Government institutions, UN agencies and civil society partners, expanding leadership-level dialogue, and ensuring meaningful participation of refugee-led and grassroots organisations.	31 December 2026	Ongoing	In place with the Compass Network partners
3	[continue as needed]					
RECOMMENDATION 2:		Strengthen support for protection-sensitive access to territory at the EU's external borders.				
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):		[add only if partially agree or disagree was selected]				
Unit or function responsible:		UNHCR Bulgaria Country Office				
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments

1	National ownership	UNHCR Bulgaria	Building upon the MoU signed in 2025, in close collaboration with the Office of the Ombudsperson further strengthen the national capacity to implement effective monitoring of compliance with fundamental rights, including supporting the establishment of independent national monitoring mechanism, and foster transparency and cooperation.	31 December 2026	ongoing	MoU signed in September 2025
2	National ownership	UNHCR Bulgaria	Subject to availability of resources, and where possible in coordination and cooperation with FRONTEX, and Council of Europe and other relevant regional and international actors, continue to organize capacity-building events for border and national police and Directorate „Migration“ on vulnerability assessment and referral of persons in need of international protection to the asylum procedure, and regular seminars for magistrates on effective investigation of alleged ill-treatment and human rights violations at external borders in cooperation with the National Institute of Justice.	31 December 2026	ongoing	Such trainings were successfully organized in 2025. MoU was signed with the National Institute of Justice to facilitate capacity development of judges and prosecutors
3	[continue as needed]					
RECOMMENDATION 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.				
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):		[add only if partially agree or disagree was selected]				
Unit or function responsible:		UNHCR Bulgaria Country Office				
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	Sustainable programming	UNHCR Bulgaria	Recalibrate UNHCR sectoral strategies to strengthen complementarity with national systems, and advocate to progressively embed protection activities within existing national frameworks for long-term sustainability in collaboration with government institutions, municipalities, civil society, and community actors through project-based initiatives.	30 June 2026	Planned	
2		UNHCR Bulgaria	Provide targeted advocacy and technical assistance to ensure that ongoing legal reforms in asylum legislation and protection	31 December 2027	Ongoing	Subject to resources

	Support to the national implementation of the EU Pact on Migration and Asylum		systems are effectively translated into practice in line with the EU Pact on Migration and Asylum, and the international human rights standards.			
3	Evidence-based programming	UNHCR Bulgaria, DIMA, RBE	Leverage existing tools and data to identify and prioritise all underrepresented population groups to strengthen advocacy and ensure more targeted, inclusive programming across refugee, asylum-seeking, and stateless communities, and advocate for embedding evidence-based analysis and programming in the national systems.	31 December 2027	Ongoing	
4	Community empowerment	UNHCR Bulgaria	Strengthen participation of refugees, including through the local refugee-led organisations, by investing in their institutional capacity and ensuring their meaningful participation in policy and decision-making processes, enabling them to move beyond service delivery toward long-term influence, ownership, and sustainable community-driven solutions.	31 December 2026	Planned	Subject to resources
RECOMMENDATION 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.				
Management response:		<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Partially agree <input type="checkbox"/> Disagree				
Reasons (if partially agree or disagree):		[add only if partially agree or disagree was selected]				
Unit or function responsible:		UNHCR Bulgaria Country Office				
Top-line planned actions		By whom	Comments	Expected completion date	Progress	
					Status	Comments
1	Multi-purpose hubs	UNHCR Bulgaria	Work with national authorities and municipalities to institutionalise Bulgaria Network of Compass Protection and Inclusion Centres by embedding them into local service systems, formalising referral pathways, and securing political, administrative, and financial commitments that ensure their sustainable transition into publicly owned and financed structures.	30 June 2027	Ongoing	UNHCR has already approached municipalities and regional governors in the areas where the Compass Protection and Inclusion centers

						are located with a view to explore potential (co)-funding options, joint fundraising initiatives and provision of suitable premises free of charge to ensure sustainability. In addition, several Compass Center services in Varna and Plovdiv have been approved and licensed by the Agency for the Quality of Social Services of the Ministry of Labour and Social Policy as social services in January 2026, a positive development on the process of being formally recognized as state-led services.
2	National framework for integration	UNHCR Bulgaria	Advocate for the establishment of a supervisory body responsible for refugee integration; provide technical support for sectoral initiatives across relevant ministries, with a view to ensure clear institutional responsibilities, dedicated budget allocations, and alignment with the EU Pact on Migration and Asylum and national social protection frameworks.	30 June 2027	Planned	
3	Strategic engagement with private sector and academic institutions	UNHCR Bulgaria	Strengthen strategic engagement with private sector and academic institutions to expand employment, higher	31 December 2027	Ongoing	UNHCR Bulgaria Private Sector Engagement Strategy was

			<i>education, vocational training and other self-reliance opportunities for refugees and stateless persons.</i>			finalized at the end of 2025.
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