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

PROTECTION BRIEF
BULGARIA

IMPLEMENTATION OF THE NEW PROGRAMME FOR HUMANITARIAN ASSISTANCE AND INTEGRATION

JUNE 2025

Yulia and Daria found an opportunity to continue working in Bulgaria as biologists after fleeing the full-scale war in Ukraine. © UNHCR/Dobrin Kashavelov

Operational Context

Since the escalation of the conflict in Ukraine in 2022, Bulgaria has granted temporary protection to more than 205,190 refugees as of the beginning of April 2025. Temporary Protection (TP) for refugees from Ukraine in Bulgaria has been extended until March 2026. Through an annual verification exercise, the Government has renewed the validity of temporary protection ID cards. 62,257 refugees have validated their Temporary Protection after the completion of the countrywide reregistration exercise that ran from February to end-April according to the State Agency for Refugees (SAR). Some 34,500 registrations have been deactivated in this process; however, renewals continue at the Registration and Reception Centres, as well as transition to longer-term residence options when possible.

The brief aims to advocate for key protection concerns to be taken into consideration in relation to the Bulgarian government's new Programme for Humanitarian Assistance and Integration for persons displaced from Ukraine, which came into force on 1 May 2025.

Key figures

The 2024 Socio-Economic Insights Survey (SEIS) shows that the majority of refugee respondents have been in Bulgaria for an average of 23 months.[1] This suggests a stable population that requires ongoing meaningful inclusion within national systems. More than two-thirds of the Ukrainian refugee population consist of women and children, one-fifth are older refugees over the age of 60, and according to the SEIS, eight per cent of individuals have a disability that require the care of others. These groups need continued and targeted support for their integration.

Figure 1 - Bulgaria's 2024 SEIS for the Ukraine Situation

Overview

New Programme for Humanitarian Assistance and Integration

The Bulgarian Government maintains practices that give access to people displaced from Ukraine through its borders, granting temporary protection to more than 204,000 refugees since March 2022 until June 2025. The Agency for Social Assistance provided at least one social benefit to more than 18,200 refugees by end of March 2025, and the Employment Agency supported the employment of 2,855 refugees under the Solidarity Program that ended in July 2023. In 2022, the Government of Bulgaria developed the Programme for Humanitarian Assistance for displaced persons from Ukraine granted temporary protection in Bulgaria. The programme encompasses accommodation support in state and municipal facilities, hotels and other places of accommodation under the government-sponsored accommodation scheme for refugees with vulnerabilities.[2] This programme has undergone several short-term extensions by the Government since its introduction until the adoption of the decision of the Council of Ministers No 278/02.05.2025. As of 5 May,

[1] *Bulgaria - Socio-Economic Insights Survey (SEIS) - Preliminary findings*, July 2024; see also: UNHCR Microdata Library, Socio-Economic Insights Survey (SEIS) – Bulgaria 2024; UNHCR Bulgaria, *Protection Brief on Implementation of TP Directive – July-December 2024*, 28 February 2025.
[2] Since November 2022, the provision of food assistance in government accommodation was removed from the program.

4,593 Ukrainian refugees were accommodated across 338 facilities, the vast majority being non-governmental. Most are hosted in hotels, hostels, and pensions, with Nessebar (45%) and Varna (17%) as the top districts, in Burgas region, followed by Varna region. Any new arrivals who wish to be placed in government-sponsored accommodation must pass through the Elhovo Transit Centre[3] located in the southeastern Yambol region on the border with Türkiye, until a committee decision on the placement.

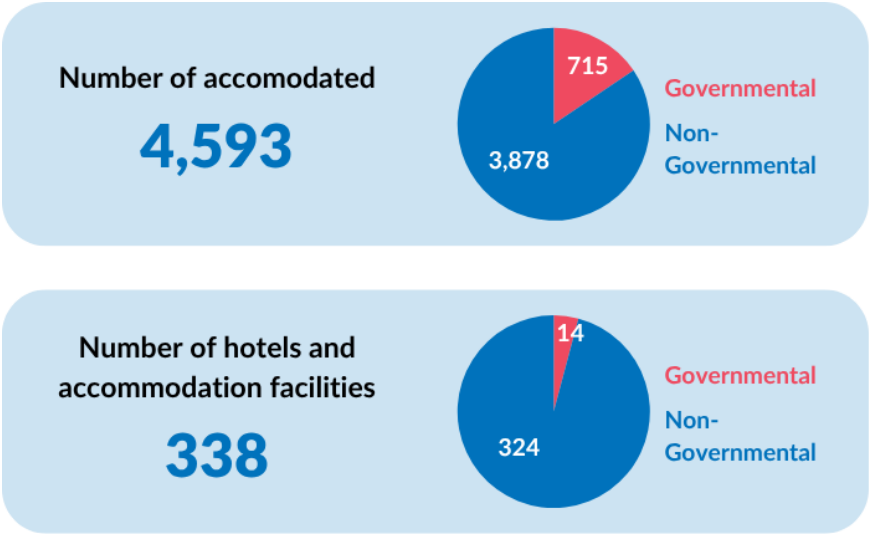

Figure 2 - Ministry of Tourism accommodation figures

The new Programme for Humanitarian Assistance and Integration was opened for public consultations on the Government's strategies website prior to its adoption by the Council of Ministers on 2 May 2025. It provides for 60 days of stay in state-owned facilities for new arrivals and continued accommodation support for those in predetermined risks groups already part of the government-accommodation schemes, which UNHCR proposed to be 90 days. The Agency for Social Assistance is tasked with the assessments to determine whether refugees fall under the persons at risk category. The risk groups include single parents with a child or children below 17 years of age[4]; pregnant women after the third month of pregnancy; a person with a permanent disability and/or mental illness and their caregiver; a person caring for a seriously ill family member who is dependent on the care of others; and a person aged 65 or over. Medical conditions, pregnancy and disabilities are required to be certified by a medical document issued by a competent authority in Bulgaria. Risk groups will be assessed by the regional branches of the Agency for Social Assistance upon submission of an application form along with all necessary supporting documents translated into Bulgarian. The deadline for the submission of documents for those already accommodated was **31 May 2025**.

UNHCR acknowledges Bulgaria's generous implementation of a humanitarian program that accommodated refugees without exception that provided home to thousands of most vulnerable persons. UNHCR also welcomes that, according to the new Programme for Humanitarian Assistance and Integration, accommodated refugees are entitled to benefit from the Program when they find employment. An annex to the programme includes an Integration Measures Implementation Plan, which primarily outlines existing programmes run by relevant government bodies and contains only a limited number of specific measures.

[3] The temporary transit center in Elhovo, initially constructed in 2020 as a detention facility for irregular migrants, has 221 containers with a total capacity of 1,800 places.
[4] For a child or children aged 12 to 16 years, where the children are not covered by the education system in the country for reasons beyond the parent's control and after an application for admission to school has been made.

An innovation is the setting of targets of certain activities, such as placing 18 individuals in jobs through the Employment Bureaus each month. The programme also outlines general integration measures. However, UNHCR, in consultation with its partners and refugees, communicated to the Government that:

- The Programme lacks targeted support for finding housing after leaving accommodation facilities and for Bulgarian language courses.
- It also needs clear coordination, and a defined role for the municipalities in view of their key importance in successful inclusion and local integration.
- UNHCR advocacy also focuses on the absence of measures to overcome legal and operational challenges to access to rights and services for persons under temporary protection, in particular access to family benefits for children, in line with the caselaw of the Bulgarian administrative courts overturning the refusals issued by the Agency for Social Assistance.
- A crucial concern is limited or inconsistent access of refugees to financial services, including a payment account for basic transactions. In the absence of a bank account as well as the registration card not serving as an ID card, refugees face challenges in accessing labour contracts and rental contracts.

As submitted by UNHCR and its partners, in accordance with the Administrative Procedure Code, refugees should have the opportunity to appeal negative decisions—or submit additional information—regarding their eligibility under the Program, specifically their classification within a risk group, as determined by the Directorate for Social Assistance. However, this rendered very difficult in the absence of formal, individualized decisions.UNHCR continues to advocate that Bulgaria to align the new Programme for Humanitarian Assistance and Integration with, among others, the EU Action Plan on Integration and Inclusion 2021-2027, *EU Strategy on Combatting Trafficking in Human Beings (2021-2025)*; *EU Strategy on the Rights of the Child and the European Child Guarantee* (2021); Commission Recommendation on developing and strengthening integrated child protection systems in the best interests of the child (2024); *Union of equality: Strategy for the rights of persons with disabilities 2021-2030*; and *A comprehensive approach to mental health* (2023). This can ensure that the new programme reflects EU standards and best practices, particularly in addressing the needs of vulnerable groups and support operationalize relevant EU law. UNHCR stands ready to provide technical assistance to further improve the implementation of the Programme.

Protection Risks

Socio-Economic Vulnerabilities

The 2024 SEIS findings[5] show that of the survey respondents currently in government-sponsored accommodation, around one-third (33%) are above the age of 60 while more than one-fourth (26%) are children. Nearly half (49%) of those in government-sponsored accommodation responded that they have a chronic illness. Over half of those who responded stated that they had difficulties in functioning and disability, these include difficulty seeing (17%), walking or climbing steps (13%) and remembering or concentrating (7%). Among those in government-sponsored accommodation, 41 per cent stated that a family member had a health problem and needed to access health care. While the majority (78%) were able to receive the needed health care, nearly one-fifth (18%) did not. Of the respondents, one-third (33%) said that not all members of their household have health insurance, a higher percentage than those who are not benefitting from the government-sponsored accommodation scheme reporting that they do not have health insurance (11%).

[5] *Bulgaria - Socio-Economic Insights Survey (SEIS) Preliminary findings*, July 2024.

At the time of the survey, 38 per cent of respondents in government accommodation reported social protection benefits from the Ukraine government – primarily pension – as the main source of income;[6] 45 per cent also reported receiving financial support from family members in Ukraine. Additionally, almost two-thirds (61%) said that their household had to spend savings due to lack of resources to cover basic needs, despite having their accommodation costs covered. More than half of households (53%) in government-sponsored accommodation stated that they can afford fewer goods and services compared to their first months in Bulgaria, compared to 30 per cent of respondents in private accommodation. Additionally, over one-fifth of households (22%) reduced essential health expenditures, and nine per cent of households stated that they had to borrow or purchase food on credit due to a lack of resources. The majority (74%) of respondents in accommodation have received aid in the last three months, mostly humanitarian distributions, such as non-food items and clothing.

Since the start of the new Programme for Humanitarian Assistance and Integration, UNHCR and partners have observed that the procedures for certification of disability are complex, time-consuming, and costly for those who missed health care payments and would have to cover the costs of any medical examination. These are similar to the challenges refugees face in documenting their disability in applying for disability benefits. Refugees will further need assistance on the translation of all documents in Bulgarian as part of the requirements. Some highly vulnerable individuals will have to leave the programme as they have not paid their health insurance in the last three years and have no means to initiate the disability certification process. In addition, the new Programme specifies that pregnant women beyond the third month of pregnancy fall in the risk group. UNHCR has expressed concern that this provision excludes women in the first trimester.

The application does not have a registration number, and in practice, the Agency for Social Assistance does not plan to provide individual feedback to each applicant. Instead, information about those eligible to remain accommodated under the Programme will be sent directly to hotel owners. In effect, this does not allow appeal of administrative decisions.

Accommodation

The EU Action Plan on Integration and Inclusion 2021–2027 identifies adequate housing as a key enabler of integration, emphasizing early access to stable, safe, and affordable housing, including social housing. UNHCR's *Integration Handbook* reinforces that housing is not just shelter—it is critical for accessing education, employment, health care, and building social ties, and should be a right-based, inclusive process.

Accommodation provided under the Programme for Humanitarian Assistance and Integration so far is often located in small towns, resorts or remote areas, with limited access to services, further exacerbated by lack of transport options and financial means to reach larger towns where these are available. There are no social workers employed at government-sponsored facilities, even where a significant number of older persons, persons with disabilities, persons with serious health conditions, and separated children under their care are accommodated. There is a need to refer people with specific needs for specialized services or assistance, including social benefits. Lack of information and activities further exacerbate isolation and hamper their inclusion.

Participatory assessments with refugees in Bulgaria show that employment does not always lead to self-reliance and access to housing in view of labour exploitation, employment of technical experts and professionals as unqualified labour, and lower incomes associated with these factors. Refugees who can afford solutions in the housing market need guidance and support to find housing solutions; for instance, they lack accurate information on housing or are denied rental contracts because of uncertainties of their stay in Bulgaria. Others prefer to stay closer to their new communities within the humanitarian

[6] The pensions are often below subsistence level within Ukraine; see: OECD, *Safeguarding the sustainability of the Ukrainian pension system*, 6 June 2024; UN Economic Commission for Europe, *Measuring Poverty in the Conditions of War in Ukraine*, November 2024.

accommodation centres to help each other in childcare or care of family members with disabilities, serious medical conditions, or other vulnerabilities. There are no provisions aimed to support or subsidize rents at the private market, while access to social housing is difficult due to lack of availability and administrative requirements in a number of municipalities for the person to have resided there for a long period of time which refugees cannot meet. Residential social services for homeless persons such as shelters are insufficient to address the demand of both refugees and the local population.

In addition, the Programme needs specific provisions to ensure that persons with disabilities are accommodated in facilities appropriate to their health conditions. Currently, there are challenges with the identification of vulnerabilities and ensuring placement in appropriate and adapted accommodation, including access to services for those with specific needs. At present, there are no effective remedies or measures in place for individuals with specific health-related needs—such as wheelchair users or those requiring accessible infrastructure—when they are assigned to accommodations that are not adapted.

UNHCR remains concerned that the current housing arrangements for refugees in Bulgaria fall short of the EU standards. The conditions in government-sponsored accommodation—marked by insufficient privacy, inadequate facilities, limited accessibility, and a lack of on-site support services—pose serious obstacles to the inclusion and well-being of persons with vulnerabilities. Furthermore, structural barriers in accessing private and social housing, compounded by administrative and financial constraints, leave many refugees without viable long-term housing solutions.

In light of the Temporary Protection Directive and the Council Implementing Decision (EU) 2022/382 of 4 March 2022, as well as the relevant case law of the Court of Justice of the EU, it is essential that transition from emergency or humanitarian accommodation is supported by clear procedures, thorough needs assessments, and access to effective remedies for those denied accommodation support. These measures could support Bulgaria's commitment to the principles of dignity, autonomy, and best interest of the child.

Opportunities

UNHCR's 2024-25 Regional Protection Profiling and Monitoring findings show that refugees from Ukraine have found employment in Bulgaria in various fields such as education (14%), administrative support (13%), construction and engineering (11%), and social assistance and healthcare (10%). Those in government accommodation also engage in work: full time employment in Bulgaria (16%), part-time employment in Bulgaria (11%), remote employment in Ukraine (7%, self-employment (4%), and other types of remote employment (4%). When also asked if respondents could begin working immediately if offered a job, seven per cent of those in government-sponsored accommodation responded positively, while others are older, have disabilities and care duties. It is important to note that the majority of those in government-sponsored accommodation (76%) do not have a bank account in Bulgaria. (However, given high educational qualifications of refugees from Ukraine, only 38% are employed in jobs that allow them to use their professional or educational qualifications; and 18% report labour exploitation.)[7]

In Socio-Economic Insights Survey, refugees from Ukraine in government accommodation have mentioned support for accessing social assistance (24%), language training (14%) and job matching (10%) as the top services needed to improve their financial situation in Bulgaria. With regard to the new Programme for Humanitarian Assistance and Integration, the transition after of stay in government-sponsored accommodation must include integration support for meaningful socio-economic inclusion. This can include Bulgarian language classes, access to social protection schemes, as well as employment support.

[7] For comparison, see: UNHCR Bulgaria, *Protection Brief – July 2024*, August 2024; *Voices of Refugees – Participatory Assessment 2023*, May 2024.

UNHCR and Partners' Support

To support with the new Programme for Humanitarian Assistance and Integration, UNHCR and its partners provide a range of services, complementing governmental national and regional services, through the Bulgaria Network of Compass Protection and Inclusion Centres established across Bulgaria in 2024. The Compass Protection and Inclusion Centres are a joint initiative between UNHCR and partners, namely, the Bulgarian Red Cross, Ukraine Support and Renovation Foundation (USRF), Energy Association Varna, Caritas Bulgaria, Foundation for Access to Rights and the Bulgarian Helsinki Committee. Located in six refugee-hosting cities in Bulgaria (Sofia, Plovdiv, Burgas, Varna, Dobrich and Harmanli), these centres promote empowerment, integration, and social cohesion for refugees and vulnerable local communities through a comprehensive support tailored to diverse needs. Services include legal assistance and social protection; specialized child-protection services and child-friendly spaces; women empowerment and life-skills sessions, event and workshops; community mobilization and social cohesion; psychosocial support services; livelihood and economic inclusion support; education; and mobile services and mainstreaming inclusion of persons with disabilities.

All Compass centres have been actively disseminating information regarding the new programme and its requirements. In Varna, an information session was organized in collaboration with the local Directorate for Social Assistance (DSA), ensuring that both refugees and stakeholders are well-informed. Additionally, both Compass centres in Plovdiv and Varna have taken proactive steps by holding coordination meetings with their respective local DSAs to streamline the application process and address any logistical concerns. Compass Centre in Varna has also established a joint schedule with the local DSA. This schedule outlines specific dates for group submissions of applications from all hotels and accommodation bases, aiming to ensure an orderly and efficient process.

Despite these efforts, several challenges have emerged. The application process only commenced on 19 May across the country due to technical issues faced by the DSAs. This delay has raised concerns about whether all eligible refugees could submit their applications before the 31 May deadline. A relevant concern is the inconsistency in documentation requirements across different cities. Although internal instructions exist, varying documents are requested to verify certain vulnerabilities. Moreover, all documents must be translated by an official translator and notarized, which poses a financial burden on partners who currently lack the budget to support refugees with these costs. Some of the most vulnerable individuals may be excluded from the Programme due to their inability to meet certain administrative requirements in time.

In furthering collaboration between the Ministry of Labour and Social Policy, the Agency for Social Assistance shared their internal instructions , including clear guidelines on the required documentation for each risk group. Additionally, a coordination meeting between Compass Protection and Inclusion Centre staff and the local DSAs in the Burgas region has been agreed to address ongoing issues. Burgas remains the most challenging region as it hosts the largest number of refugees accommodated under the Programme. Establishing collaboration with NGOs working with refugees can facilitate the process in Burgas.

Calls to Action

UNHCR recommends the Government of Bulgaria to:

- Ensure an adequate transition period from the current humanitarian assistance programme for individuals who no longer meet the eligibility criteria, in line with the obligation under EU law to guarantee access to suitable accommodation as core to a dignified standard of living. Particular attention must be given to persons with special needs by allowing them to remain in appropriate accommodation until the end of the Temporary Protection period or ensuring timely referral to suitable social service accommodation, and providing one-off social assistance to those transitioning from the programme, in line with Article 16 (1) on the Law on Implementing the Law on Social Services, which envisages such assistance for incidental expenses.
- Establish a mechanism to allow reconsideration and correction of conclusions made by the Directorate for Social Assistance concerning an individual's classification within a risk group. Given the significant implications of such a determination, it is essential to provide a procedure for appeal under the Administrative Procedure Code and in line with EU law. Furthermore, individuals should be allowed to benefit from the Programme until a final court decision is rendered. There is also need for emergency accommodation, especially for those who are found ineligible and facing homelessness.
- Consider a flexible approach for the certification of refugees' disabilities, including intellectual and psychosocial disabilities, and serious medical conditions and the documents required, to ensure that the most vulnerable are not overlooked or excluded due to inability to navigate and cover the costs of a complex system; and ensure that individuals with health issues and specific needs (e.g., wheelchair users, those requiring ramps, etc.) are placed in accommodations that are adapted for accessibility and dignity.
- Protect family unity by ensuring that all family members of vulnerable persons are eligible for support under the new programme for Humanitarian Assistance and Integration.

Develop an inclusive accommodation and housing strategy that addresses the needs of all vulnerable groups, including refugees, —older individuals, women at risk, persons with disabilities, and those with serious medical conditions—through a data-driven approach and mapping of available, accessible housing options. It would be important to promote mid and long-term solutions towards sustainable housing, including access to social benefits and social housing schemes and efforts to expand long-term low-income and affordable housing solutions for all vulnerable groups in Bulgaria, making use of available EU and European funding and technical support mechanisms. Staying in humanitarian accommodation should generally only be the case for a limited period of time, allowing refugees to move to longer term independent or semi-independent housing as soon as possible.

END.