



External evaluation of the Swiss Contribution to the inclusion of Roma and other vulnerable groups in Bulgaria, "Health and Education for All" (ZOV Programme)

MANAGEMENT RESPONSE on the final Report on Bulgaria by SDC 20.2.2020

1. Background

The current document represents the management response of SDC to the final evaluation report from 5 April 2019 on the Programme for Promotion of Social Inclusion of Roma and Other Vulnerable Groups in Bulgaria (Health and Education for All – hereafter ZOV Programme). This evaluation has 3 modules as follows: 1. Evaluation of RIF in Romania; 2. Evaluation of ZOV in Bulgaria; 3. A general module at the level of the overall theme "Social Inclusion of Roma and other vulnerable groups" as part of Swiss Enlargement Contribution. The main purpose of the evaluation is to:

- assess the impact and results achieved by both Roma Program thus contributing to the accountability towards stakeholders both in the beneficiary countries (BG and RO) and in Switzerland;
- identify lessons learned, challenges faced, and best practices obtained at the level of each country and draw recommendations for potential new contribution in the area of Roma inclusion and other vulnerable groups in both countries and in other new EU Member States confronted with high challenges in social inclusion of vulnerable groups.

The evaluation was conducted by a mixed team of external, national and SDC intern experts:

- 2 external evaluators from B,S,S Economic Consultants (Basel) – Harald Meier and Michael Morlok
- 2 national experts – Ilona Tomova and Iva Boneva
- 2 SDC experts – Laurent Ruedin and Enrichetta Placella

Module 2 is based on interviews with stakeholders from the national and local governments, experts and Roma community members in Bulgaria, an online survey as well as the review of documents. The main characteristic of the evaluation approach is the distinction between the expert and the participatory evaluation. The expert evaluation captured the opinions and observations of knowledge holders who were responsible for the design, the delivery or the supervision of the ZOV interventions, while the participatory evaluation focused on experiences of the beneficiaries from the Roma communities.

ZOV Programme consisted of 6 projects implemented by the municipalities of Sliven, Burgas, Plovdiv, Ruse, Shumen and Montana in the period between 2015/16 and 2019.

The evaluators' mission in Bulgaria took place from 10 to 14 December 2018 in the cities of Plovdiv, Montana (expert) and Sliven and Burgas (participatory) as well Sofia (national institutions and other stakeholders). Additional participatory mission was held by the national experts in Plovdiv, Montana and Shumen in February 2019.

The purpose of this management response is to present a consolidated appraisal of the SDC on the findings and recommendations shared in the report part for Bulgaria (2nd module).

2. General Appreciation of the Evaluation Process and Evaluation Report

SDC acknowledges the receipt and accept the final report and its annexes prepared by the evaluation team. Overall, the report on Module 2 and its annexes are well-structured and correspond to the ToRs and main evaluation questions defined in the frame of the inception report. The level of details, comments and recommendations corresponds with SDC's expectations. Although time for field visits was limited, and accurate baseline data is missing due to lack of official realistic data on the segregated communities in Bulgaria, SDC acknowledges that the assessment is based on a good understanding of the projects, processes and procedures.

The evaluation methodology was mainly qualitative, which is understandable due to the lack of reliable and replicable baseline measurements. Additional quantitative evidences would however have made some of the conclusions stronger. The findings in some areas of the intervention were based only on few interviews, limited observation or based on personal interpretation by the evaluators. This limitation is especially sensitive for conclusions on social and cultural patterns.¹

3. Position towards overall assessment and lessons learnt

SDC finds the overall assessment of the Programme to its bigger extent realistic and adequate having in mind the specificity and complexity of the situation in Bulgaria. In more details, SDCs position is as follows according to the different dimensions of assessment:

Relevance

The Programme has been assessed as very relevant towards beneficiaries' needs and priorities, towards the national strategies for Roma inclusion and different donor funding. SDC agrees with the evaluators' team assessment. The Programme has been designed following the National Strategy for Roma Inclusion in order to be in line with and to support the efforts of the state in the field of Roma inclusion. Health and education are two of the fundamentals of integration (along with housing, employment and empowerment), which will continue to be very relevant for the future. The intention to integrate these two types of services and putting the municipalities in the lead was taken as a good example and replicated by the latest European Social Fund (ESF) funded Roma inclusion programmes in Bulgaria. Even if to work with and especially inside the most segregated communities could have been considered disputable or risky taken in mind the complexity, this approach appeared to be very much appreciated and relevant by both authorities and local communities.

Effectiveness

SDC agrees to a great extent with the satisfactory assessment of the effectiveness of the Programme by the evaluation team. Some delays occurred in most of the projects, which led to changes, but the Programme was flexible in updating activities and budgets accordingly. SDC agrees that some project targets were not fully achieved due to lack of capacities or efforts of some of the municipalities or NGOs/project partners. Migration or insufficient needs identification as for example in the case of Russe, were other external hindering factors.

SDC agrees with the evaluators' conclusions when it comes to outcome results that the combination of new educational and health infrastructure combined with enhanced activities, skills, mediation and community involvement (soft measures) led to significant achievements. SDC agrees with the statement that there is still a need of more efforts to include the ones most in need. SDC acknowledges that the Programme had a good success on policy level through the working groups in the Ministries of Education and Health.

SDC disagrees with the comment that empowerment was dropped as an objective. In fact the respective budget was redistributed to the municipal projects with the idea that empowerment measures shall be implemented on local level. SDC agrees that some of these measures taken by the municipalities were rather focused on Roma cultural events with indeed questionable

¹ Specifically, this concerns several statements in the document, like p. 17 "Nonetheless, interviews with beneficiaries also suggest that perceptions or considerations of husbands and mothers-in-law still often negatively influence health seeking behaviour of women", which is a general conclusion based only on several interviews, or p. 18 "The activities that the evaluators were able to observe during one of the municipal visit, particularly belly dancing kindergarten children, are arguably everything else than empowering.", which is a statement based on a concrete visit in Plovdiv observation, where the activity observed was not even a part of the empowerment component of the project.

empowerment effects. In general, SDC acknowledges the finding that some of the challenges² could have been mitigated and better planned in advance. On the other hand, some challenges (structural and legislation as well as national/local administrative processes) are almost impossible to be influenced.

Efficiency

SDC only partially agrees with the unsatisfactory assessment of the efficiency of the Programme. On the Programme's set up, SDC doesn't fully support the recommendation for positioning the PMU in the Central Coordination Unit (CCU)³, as it will be a challenge to have the PMU in a more central position due to administrative constrain, the CCU being a transversal programming and monitoring entity. The PMU could be mandated by Bulgarian authorities, but stay sufficiently autonomous, as it was similarly the case with MLSP. SDC indeed accepts the comment that the communication between MLSP and PMU could have been more constructive. The positioning of the PMU in MLSP and the respective contacts with the MLSP experts contributed to the design of the new ESF funded operational programmes using ZOV's pilot experience in integrated approaches (see above in Relevance) and can be considered as an unintended, positive effect. For the future, the positioning of a PMU would depend on the new Programme's objectives and approach.

SDC is convinced of the importance to work directly with the local authorities and acknowledges this finding of the report.

In terms of effective (adequate) use of costs for the same type of services, the comparison between the different municipalities is not always relevant, as the specifics of each segregated community and the municipal management are quite heterogeneous.

In general, SDC assess the efficiency as satisfactory, considering the following aspects: limited human resources of the PMU, the complexity of the Programme, the different set up in each municipality, the regular changes of the political management of the concerned partnering ministries, the lack of experience with the PMU approach from the side of SDC, the lack of realistic data on segregated communities, the cumbersome administrative system and the unpredictable external factors such as migration. Nevertheless, SDC agrees that a better M&E system and a better strategic planning would have led to a higher efficiency.

Impact

SDC agrees that the Programme has achieved its objectives in improving the living conditions of the targeted communities as well as that more efforts should be taken in focusing on empowerment and combatting negative attitudes towards Roma people.

Sustainability

SDC accepts the conclusion that the sustainability of the project's interventions is considerably high, especially in the educational component, where financing has been provided by delegated or national programmes budgets. For this, once again, working directly with the municipalities proved to be the right approach. In the health sector, the sustainability of certain components, especially the ones targeting uninsured people, can be indeed a challenge due to the complexity of the issue. Some of the health offices, which have not become a part of a bigger medical (public) structure, bear a risk in terms of financial sustainability (e.g. Montana).

Lessons learnt

SDC agrees to a great extent with the lesson learned summarised by the evaluators. SDC acknowledges that the beneficiaries should have been more actively involved in the design and implementation of the Programme. The quality of education, as mentioned in the report, should become main priority for SDC/SCO. Measuring and monitoring of results should be better planned in advance.

² Such as: delays in the programme planning, focus on soft measures in advance, involving Roma communities in the whole project design and implementation process, a more resourceful management unit in view of the complexity of the Programme etc.

³ The permanent Roma Integration Subcommittee mentioned in the report as one reason for this positioning was actually never established. CCU, as official counter part of Bulgarian-Swiss Cooperation Programme, and having an expert on Roma integration from their team being a contact point for the ZOV Programme, should be in general able to assist for the inter-ministerial coordination and communication.

4. Management Response to the recommendation

Out of the 8 general recommendations. SDC agrees fully on 5 and agrees partially on 3.

Regarding the recommendations only agreed partially, SDC would like to add the following nuances:

- R1 on collaboration with a group of core municipalities, SDC welcomes the idea but would like to stress additionally the importance of strengthening partnerships with relevant institutions and organizations, for example with schools and businesses, depending on the future field of intervention.
- R4 on efforts to position a PMU in a central position within the administration and better resource it: SDC would like to identify the most effective set-up for the management and would like to consider all possible options together with the government.
- R5 on improving the results orientation and an improved M&E system: SDC would avoid giving too much emphasis on official statistics due to their questionable quality but making better use of external evaluation tools before proceeding with extra studies.

5. Dissemination of the evaluation report in Bulgaria and in Switzerland

The Evaluation report should be shared with the Bulgarian stakeholders (NCU, members of the Steering Committee, the 3 line ministries). The findings of the evaluation (plus lessons learned and recommendations) were already presented to the Steering Committee members as well as during the final closing event of ZOV Programme on 25 June 2019. Later, in July, they were also presented during a workshop on exchange amongst the structures, managing ESF funded Roma inclusion programmes and the bilateral programmes (CH, NO, EEA), organised by the CCU. The aim of this workshop was to present the positive experience and lessons learned of ZOV and to discuss how they can be used to benefit and help for better results the other Roma inclusion programmes.

An accompanying letter shall highlight the SDC/SCO position, based on the points 1 to 4 (excluding 5, 6 and 7) of the management response.