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NEGOTIATE

Overcoming early job-insecurity in Europe

NEGOTIATE – Negotiating early job-insecurity and labour market exclusion in Europe
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Analysing linkages between horizontal and vertical policy coordination – Country
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Authors	Lyuba Spasova in cooperation with: Rumiana Stoilova Pepka Boyadjieva Veneta Krasteva Petya Ilieva-Trichkova Gabriela Yordanova
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The report analyses the implementation of European initiatives on the labour market integration of young people, focusing on policy coordination and policy outcomes in a MLG system as well as policy recommendations on how actors might improve coordination across governance levels.

Empirical information in this working paper is based on secondary country-based literature, official documents, existing national policy/programme evaluations and statistics, and expert interviews with 6 key officials from agencies involved in the implementation of these programmes in Bulgaria.

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List of abbreviations:

EC – European Commission

ESF – European Social Fund

ESGRAON – National System for Civil Registration of Physical Persons in the Republic of Bulgaria

EU – European Union

HRD OP – Operational Programme Human Resources Development

MES – Ministry of Education and Science

MLSP – Ministry of Labour and Social Policy

MYS – Ministry of Youth and Sports

NCEYPI – National Centre European Youth Programmes and Initiatives

NCPE – National Council for Promotion of Employment

NEA – National Employment Agency

NEAP – National Employment Action Plan

NEETs – Young People Not in Education, Employment, or Training

NGO- Non-governmental organizations

NPIEYG – National Plan for Implementation of European Youth Guarantee

NSI – National Statistical Institute

REA – Regional Employment Agency

REO – Regional Employment Offices

RIE – Regional Education Inspectorates

RLI – Regional Labour Inspectorate

SEIG OP – Operational Programme Science and Education for Intelligent Growth

VTC – Vocational Training Centre

YEI – Youth Employment Initiative

YICC – Youth Information-Consulting Centres

Introduction

Unemployed youths are one of the basic target groups defined each year of the last decade in the National Employment Action Plan; they are the target of active labour market. Analysis of funds allotted for the period 2007-2013, however, shows a discrepancy between the priority status of this category in documents and the actual funding provided for youth policies: although unemployed youths amount to about one fifth of all unemployed people, “the average expenditure, for the period, for special youth policies amount to only 0,02 % of the GDP, while the total expenditure for active labour market policies are 0,16% of the GDP” (Stoyanova, 2016:148).

Youth unemployment, and especially young NEETs, are a typical Bulgarian problem. Although considerable progress has been made in recent years with regard to youth unemployment, which has decreased from 21.8% in 2013 to 13,2% in the first half of 2016 (according to data from the Employment Agency (AE)¹ and expert interviews conducted for this project, included in Annex 2), and although in the first two quarters of 2016 unemployment among youths aged 15 to 24 in Bulgaria was lower than the average in the EU (Bulgaria – 17,4% and 15,3%, EU28 – 19,2% and 18,9%)², the integration of youths in the labour market still presents challenges. First, the levels of employment are still far below the goal set in the Europe 2020 Reform Strategy (MF, 2016) and lower than the EU28 average for youths aged 15 to 24 years (BG – 20,3%, EU28 – 33,1% for 2015)³ and for youths aged 20 to 29 (BG - 52%, EU28 – 61,4%)⁴. Second, a problem specific to Bulgaria is the large share of long-term unemployed youths (BG -7,5%, EU28- 5,9% in 2015)⁵. Third, the NEETs, who until recently were not targeted by measures and active policy, are an even more serious challenge by their large number and specific characteristics in our country (UNICEF, 2015). In Bulgaria, the share of NEETs in the age group 15-24 years in 2013 was 21,5%, in 2014 it was 20,2%, and in 2015 19,3%; by comparison, the average levels of EU28 in the last three years were respectively 13%, 12,5% and 12%. The correlation is similar with regard to

¹ EA. Information Bulletin of EA for the period January-June 2016, accessible at <https://www.az.government.bg/bg/stats/view/3/191/>, accessed 20.09.2016 r.

² http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=une_rt_q&lang=en, visited on 20.09.2016. The discrepancy between the data of EA and Eurostat (NSI) is a long-recognized problem. In this case, we note, the trends coincide.

³ http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=ifsi_emp_a&lang=en, visited on 20.09.2016.

⁴ <http://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&pcode=tesem070&plugin=1> visited on 20.09.2016.

⁵ http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=yth_empl_120&lang=en, from 20.09.2016.

NEETs in the age group 15-29 in Bulgaria, who were 25,7% in 2013, 24% in 2014, and 22,2% in 2015, while the average levels for EU 28 were respectively 15,9%, 15,4% and 14,8%⁶.

1. Discourse and political process

After the recommendation made by the Council of the EU⁷ regarding the creation of a European Youth Guarantee (YG) in 2013, in 2014 the government created and adopted a National Plan for the Implementation of the European Youth Guarantee 2014-2020 (NPIEYG) and a National Framework Agreement for the implementation of NPIEYG. The NPIEYG and the framework agreement are the basic instruments defining the general policy approach and the responsibilities of the institutions and social partners in the implementation of YG; also, the annual National Employment Action Plans (NEAP) contain detailed provisions regarding the specificities of the concrete measures and programmes for putting YG in practice, including the specification of target groups, budget, etc., for the respective year. According to experts of the Ministry of Labour and Social Policy (MLSP) and the Directorate of Labour Market Policy and Labour Mobility (LMPLM)⁸, the NPIEYG is due to be updated to reflect the changes in the YP action that have taken place after the plan was designed in 2014 and its implementation effects; also, new short-term and long-term goals will be defined, inasmuch as the goals fixed in the current plan are defined up to the year 2015.

Apart from these documents – central to the implementation of YG – the new policies and approaches regarding youth unemployment are reflected in: the Employment Promotion Act (specifically in its amendments and supplements from the years 2013 and 2015); the National Programme for Activating Inactive Persons, updated in December 2014; the National Youth Programme 2016-2020; the updated National Employment Strategy 2013-2020; the National Reform Programme Europe 2020, updated in 2016; the yearly National Employment Action Plans; the Labour Code, specifically its supplements from 2014, which regulate the conditions and minimum wage for apprenticeship and internship. Some other important documents related to YG (specifically to the first part of the Plan – activation and early intervention through education and training), are: the National Strategy for Lifelong Learning 2014-2020 and the action plan; the Strategy for Development of Higher Education in the Republic of Bulgaria 2014-2020 and its action plan; the National Strategy for Promoting and Increasing

⁶ http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=yth_empl_150&lang=en, visited on 20.09.2016, see supplement 1, table 3.

⁷ Official Journal of the European Union, issue 2013/C 120/01 from 26.04.2013.

⁸ Interview conducted for the project on 19.07.2016.

Literacy 2014 – 2020; the Strategy for Development of Vocational Education and Training in the Republic of Bulgaria for the period 2015-2020, the Strategy for Decreasing the Share of Early People Leaving Education Prematurely 2013 – 2020. However, in this last group, none of the documents aimed at education point to YG in their argumentation or identify it as a goal. Moreover, none of the normative documents of the Ministry of Education mention YG, although these documents – as pointed out in the Plan and in the framework agreement – must play an important role for establishing and applying the NPIEYG, i.e. both: the YG is not referred to in any of the Ministry of Education and Science’ documents – literary none of the strategies and plans mentions it. At the same time the strategies and normative documents of MES and specific measures (e.g.: dual education) are referred to in the NEAP and in various other reports on the YG implementation.

According to the NPIEYG, all young people at the age of 15 to 24 in Bulgaria must receive, **within four months after** they leave school or become unemployed, a job proposal or an offer of continuing education, professional training, or apprenticeship; specifically for youths registered at the employment offices, the proposal should be made by the end of the fourth month after they register. Here, we should point out a specific feature: it has been envisaged to expand the target group of the projects and schemas so as to include youths at the age of 25 to 29. On the one hand, this idea is based on the existing practice regarding the definition of age groups as reflected in the legal definitions (specifically in the Youth Act) whereby people up to the age of 29 are defined as young. On the other hand, the idea stems from the results of the analysis of difficulties and problems facing the two age groups - **15-24 and 25-29**, which appear to have identical characteristics, the age group 25-29 facing even greater challenges according to experts of the MLSP, the Directorate of European Funds, International Programmes and Projects (EFIPP)⁹. **That is why the expansion of the age range of YG came naturally and without any debate in Bulgaria (according to all the interviewed experts and the results of media analysis).**

Overall YG and the Youth Employment Initiative (YEI), have not been widely discussed and are rather a not very popular topic among specialists, despite their importance for youth employment policies and despite the fact that youth unemployment and NEETs are quite acute problems for Bulgaria both objectively and according to public opinion. Moreover, academic circles in Bulgaria clearly show little interest in YG and in the effects of the initiative also, which is probably due to the fact that sufficient empirical data permitting in-

⁹ Interview conducted for the project on 04.08.2016.

depth studies been only recently been accumulated; these data are yet to be published under the present project and under other on-going projects (for instance, EXCEPT¹⁰, School to Work Transition in Bulgaria¹¹). Overall, after YG was introduced in 2013, the scientific analyses of employment policies, including youth employment, are few and are focused on analysis of previous periods, especially the time of the financial crisis (e.g., Stoilova, 2016; Atanasova, 2015; Stoilova, 2015a; Terziev, 2014), methodological problems (Sedlarski, Toshkov, 2015), general European trends (Petrov, 2015), international studies, likewise for past periods (Todorov, 2013).

Information on YG, coming both from researchers and from youths and other stakeholders, can be found primarily in documents and reports of the MLSP and the EA, in normative documents for HRD OP, and on the internet pages of HRD OP and EA, where there is a special section on YG. This section, which has not been renewed since the range of the age group was expanded, contains brief information on YG and a comprehensive list of services provided by the employment offices, a link to NPIEYG, brochures (not particularly informative or visually attractive), as well as a link to the operation Youth Employment (one of the on-going operations). However, links are missing to several other operations being implemented at the moment.

In the media, YG and Youth Employment Initiative (YEI) are present in articles and interviews mostly in the specialized economic journals and sites (e.g., *Investor.bg*) but in most cases they are only mentioned and are not the main topic, or are discussed most generally together with other problems in the sphere of employment and social policies. Most of the articles mentioning YG are from 2014, when the preparation of NPIEYG was being widely covered and presented in different regions by various experts and officials of the MLSP and the EA; after that, interest in YG decreased. This does not mean the topic of youth unemployment is completely ignored, but in 2015 and especially in 2016, the foremost topics – both in the statements of experts and politicians and in the analyses and information articles – were concrete operations under HRD OP; i.e., at present the topic of debate has shifted from the policies themselves to the instruments for their implementation, and more specifically to the planned and achieved results. It should be noted that the articles and interviews where youth unemployment and the measures for increasing employment are a central topic, though few in number, provide quite detailed data on the achieved levels and successes in providing employment.

¹⁰ <http://www.except-project.eu/our-researchers-publications/>

¹¹ <http://www.schooltowork.bg/data/>

Starting from 2013, when the YG idea was first presented, the goals and means for youth employment policies coming from the EU through YG and YEI have generally been viewed positively and considered a good opportunity for Bulgaria. Even in the early years of the initiative, there was no national debate on whether, and how, YG and YEI will bring real benefits as part of the active labour market policy. Criticism has not been lacking in this respect, but it has remained unanswered by the MLSP. The ministers and experts of MLSP cite YG as simply an existing fact – they provide no argumentation in support of the usefulness of the policies or grounding of the approach; **the main argument is that Bulgaria will receive EU funds.** This impression is additionally strengthened by the radically different style and different emphases made by politicians at national as opposed to European level. While the MPs of the European Parliament, the European Commissioners and other politicians in European institutions talk vividly about, and fervently defend, the goals and ideas of YG and YEI in emotional statements full of strong qualification, **the representatives of the MLSP talk about YG mainly quoting numbers and statistics about the current and targeted state of youth unemployment; and in almost all articles and interviews, the emphasis is placed primarily on the funds that Bulgaria will receive from YEI and the European Social Fund (ESF).**

This approach to policies and measures, demonstrated by politicians and experts at the national level, is more rational and oriented to actual measuring, not to ideas; it has had different impacts at the different stages of implementation of YG. In the first period, 2013-2014, when YG had just been presented and implementation of the NPIEYG was starting through different activities mainly funded from the national budget and the other unspent funds from the ESF under HRD OP 2007-2013, the figures and percentages were yet far from sufficient to prove the usefulness of policies; at that time, there did not seem to be much point to the negotiated funding. In the next period, however, in 2015-2016, with the advance of the process of application of YG and YEI and the fulfillment of measures under HRD OP 2014-2020 and as real results were obtained both from the nationally financed measures and under the operational programme, the argumentation began to sound much more convincing. The figures and percentages give a visual idea of the progress made in decreasing youth unemployment – from 21.8% in 2013 to 13% in 2016 (according to EA data) and supply a practical proof of the impact of policies, at least until now (net assessments and analyses of the long-term impact are yet to be made).

The main criticisms leveled in Bulgaria at youth employment policies coming from the EU through YG and YEI can be summed up thus:

1. There is no point to employment policies through subsidies

This type of criticism comes from NGO representatives and think tanks that defend the neoliberal ideologies of minimal state intervention; according to them, the policies for increasing employment through subsidizing of jobs, training and internship are an artificial mechanism that only masks the problem temporarily but does not lead to stable long-term results or a real improvement of the unemployment situation in the country (Institute for Market Economy: In the Vicious Circle of Subsidized Employment, 26.09.2014 г.).

2. There is no point to youth employment policies

This type of criticism also comes from representatives of NGOs and think tanks defending neoliberal ideologies, but here the focus is on the target group. According to this type of materials, the identification of youths as a risk group on the labour market does not lean on real facts but is based on erroneous methodology or ideological inventions (Institute for Market Economy: Youth Unemployment – A Myth Worth Millions, analysis from 19.07.2013; Ikonograph: The Widely Proclaimed Decrease of Youth Unemployment is Almost Entirely a Statistical Phenomenon, 20.10.2015 г.)

3. Not enough is being done, or what is being done is not done well enough

This type of criticism does not reject the goals and general approach of the policies but concerns the insufficient results or shortcomings of the conducted policies. Under this category of criticism we may include: statements by opposition politicians or opposition newspapers (the newspaper *Duma*: “Youth Guarantee – a Fake Guarantee” , analysis from 08.07.2015); statements by representatives of the syndicates and social partners (CNSB: Bulgaria Has Not Received a Single Euro out of the 55 Million Euros European Youth Guarantee, 11.11.2014); news articles and analytical articles that, while pointing out certain positive sides, emphasize the failures and the negative statistics (the newspaper *Sega*: 42% of Youths Do Not Find a Job after the Employment Measures, 25.05.2015; newspaper *Dnevnik*: The Employed Are Growing in Number, or Does It Only Seem So?, 21.05.2016г.).

4. Not enough information is given

This type of criticism also does not reject the goals and policies but emphasizes the shortage of information being provided regarding the measures and operations being conducted, a shortage which hampers the implementation of YG. Such an opinion has been expressed in different periods by representatives of trade unions, youth NGOs, and politicians at national and European level; social survey data are quoted. According to data from several separate surveys, even as late as 2015, more than 80 % of the people were ignorant of the existence of YG. According to research by the Institute for Social Surveys and Marketing,

ordered by the Ministry of Youth and Sports, “81 % of youths have not heard about the European Youth Guarantee programme” (quoted from “Young People: They Don’t Work, They Don’t Study, They Don’t Read, They Don’t Do Sports, They Want to Escape”, the magazine “Club Z”, 06.02.2015). According to another survey, conducted by the agency Sova Haris among the adult population of the country, “85 percent have not heard about the initiative Youth Guarantee, and 88 percent do not know how much money has been allotted to Bulgaria under it” (quoted from “Youths in Our Country Are Not Yet Actively Seeking Employment”, the journal *Investor*, 07.12.2015).

Overall, the priority topics in this discourse are the increase of funding and the growing number and scope of measures and operations for youth employment policies. The discussions focus primarily on the measures related to internship and vocational training; these are the measures that have so far been realized under HRD OP. The specific reforms discussed in relation to YG implementation are the introduction of dual training and the regulation of internship and apprenticeship. Reforms related to the restructuring of institutions and government units or the creation of one-stop services have not been discussed.

A large number of stakeholders have taken part in designing policies and specific measures, including social partners and NGOs, whose role in the designing process is guaranteed through specially organized discussions and ensured participation in inter-administrative commissions and committees. According to experts (of the MLSP, LMPLM) and publications in the media, there was a significant discrepancy between the notions of different representatives at the start of the process: “Will Youth Guarantee Really Guarantee Employment for Young People? The Council of Ministers and the youths are looking in different directions regarding the investment of 100 million euros for youth employment until 2020” (*Investor*, 21.07.2013). While the priorities set by MLSP are internship, training, employment subsidies, entrepreneurship and mobility, whereby youth unemployment is to be decreased to 7 % in 2020, the MYS proposes investing in the infrastructure and creating information centres where young people may acquire skills through mentorship under actual working conditions. For their part, youth organizations rely on becoming direct beneficiaries and receiving funds from the EU to launch their own small businesses: “...due to misunderstanding of the process and of what YG is, they imagine some money will come to them, they take the money and start doing something with it” (quoted from an expert of MLSP, LMPLM). It should be pointed out that the syndicates and employers’ organizations do not have such misconceptions and pretension, since they have been taking part in

discussing policies even before YG, and have had the possibility of actively applying each year with projects funded from the state budget (експ. MLSP, LMPLM).

In the course of designing the NPIEYG and implementing the YG, the priorities of stakeholders have drawn closer among the activities laid down in the plan; priority is given to the MLSP's approach but the ideas of the other participants have not been rejected either. The MYS is creating Youth Information and Consulting Centres, while the promoting measures of the annual National Employment Action Plans (NEAP) envisage options for supporting the launching of business enterprises. An operation is also due to start which involves as direct beneficiaries young people with innovative ideas and a designed business plan. NGOs are also given the possibility of taking part in identifying and activating NEETs in the "Actives" operation.

2. Implementation of the Youth Guarantee, the Youth Employment Initiative and Youth on the Move

We should point out three essential differences between the operation of the YG and YEI in Bulgaria compared with those in most other European countries; as a result of these particularities, through negotiations and argumentation, the two initiatives have been expanded here despite the points laid down in NPIEYG and the Framework Agreement. The first particularity, mentioned above, **is expanding the age range of targeted youths to 29 years**. Second is the possibility, envisaged in NPIEYG, for implementing YG in stages, whereby during the first stage, up to the year 2014, **will be included as a priority group the long-term unemployed youths or those with a long period of registration in the employment offices**, instead of those with up to four months of registration; experts (from MLSP MLSP, LMLMP) have assessed this to be a good practice. Third is the agreed upon procedure whereby the limitations on funding from YEI is circumvented: the decision is that the city of Sofia will be considered separately from the Southwest Region, (or rather – other districts in this region will be considered separately from Sofia) i.e., the criteria in the case of the **Southwest Region** will be applied to districts, not to regions, a measure by which funding from YEI is provided for the other districts in this region (experts from MLSP, EFIPP and experts from EA, DEF¹²). This has become necessary due to the specificity of this region, especially the high employment rate in the district of Sofia-city, which reflects on the rate for the whole region; and also because there is an obvious need for active policy in the other four

¹² Interview, conducted for the project, with an expert from the Employment Agency, Directorate of European Funds, department of Programming and Negotiations, conducted on 19.07. 2016.

districts of this region: although the employment rate is lowest in the Southwest region in terms of percentages, in fact the absolute number of unemployed youths is greatest here¹³. That is why the agreed upon separation of Sofia-city is assessed by experts to be successful for Bulgaria (experts MLSP, EFIPP, experts EA, DEF).

Some other specific features of the way YEI operates in Bulgaria are: 1) after the YEI initiatives concludes, the funding of programmes in **Sofia-city** and all districts, as agreed upon, will be carried out through the ESF; and 2) for operations funded from YEI, there is no rule that youths should apply up to 4 months after they register at the employment offices, because analyses have shown that a large part of the inactive youths have been registered at the employment offices for **more than one year** (experts from MLSP MLSP, EFIPP).

A) Target groups

NPIEYG contains concrete youth measures, defined according to the education level and activity of the categories concerned. For the specific goals of HRD OP, the targeted youths are specified likewise according to their education and degree of activity: they include those with basic or lower education, with secondary or higher education, and the economically inactive¹⁴.

So far, experience has shown that what plays the greatest role for activating NEETs is **the partnership approach**, especially the active inclusion of NGOs and of the municipalities – the so-called youth mediators. **Youth mediators** are an entirely new factor on the labour market, which has been included as a result of the YG; these mediators are, themselves, young people aged up to 29, with a higher education, appointed by the municipalities to identify, and make contact with, inactive persons aged up to 29 in order to activate them, and especially to orient them to employment. Despite the very positive assessment given them by experts (experts MLSP, LMLMP; experts EA, GD ES¹⁵; expert DREO¹⁶), the data show large differences in the activity of various youth mediators depending on their personal characteristics and motivation; despite the positive qualities of this approach, these differences raise serious questions as to its effectiveness. NGOs working with youths play an important role, especially for the implementation of projects under the “Active” programme,

¹³ http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=lfst_r_lfu3pers&lang=en, visited on 20.09.2016; see also supplement 2, tables 3, 4 and 5.

¹⁴ If they work or not and how long they are economically inactive – the YG is implemented in stages in BG (p.11) and in 2014 they particularly focused on long term unemployed youth.

¹⁵ Interview, conducted for the project, with an expert from the Employment Agency, General Directorate of Employment Services on 19.07.2016.

¹⁶ Interview, conducted for the project, with an expert from the Directorate of Regional Employment, city of Blagoevgrad, on 01.09.2016.

which is based on a new approach founded on partnership and the competitive principle in applying for the programme.

B) Focal points of measures and structural measures/instruments of YG/YEI

NPIEYG envisages two types of measures: 1) Early intervention and activation; and 2) Supporting measures for integration in the labour market. Depending on the youth's profile, they must be offered good-quality proposals for jobs (subsidized jobs or jobs on the initial labour market) or for training (training for professional qualification, for obtainment of key competencies; for continuing education). They may also be offered professional guidance, career consultation and motivation training.

- Measures for providing employment (“first job”)

Although all the programmes and measures used for the NPIEYG, both under the annual NEAP and under HRD OP, aim at providing employment for youths, very few of them are aimed exclusively at this but also intend to raise qualification by providing training or apprenticeship. This is especially true for operations under HRD OP inasmuch as during the current programme period, the connection with training and with the demand for respective competencies is among the conditions set by the European Commission (experts from MLSP, LMLMP; experts from MLSP, EFIPP).

Measures for increasing employment consist in the following: 1) mediation for employment on the real labour market; 2) provision of subsidized employment through measures addressed to the employer, and 3) measures for assisting persons for territorial mobility or entrepreneurship and business. The most important measure continues to be mediation for finding work on the initial labour market: during the period January-June 2016, 21,517 youths started working through the mediation of the Directorate of Employment Offices (DEO) (Annex 1, table 5). Subsidized employment is also of essential importance; here, most youths are hired for activities under HRD OP, where employment and training are combined (with the exception of the first stage of Employment and Training of Young People, which does not envisage apprenticeship or training).

As for all other measures, registration at the employment offices is a mandatory condition for receiving social unemployment relief (under the conditions defined by law), a job offer on the real labour market, or inclusion in the programmes. The key term here is “a good job offer” – which cannot be refused and thus represents a legislative “loophole” provided to prevent continuous unemployment and alienation from work.

- Measures for increasing competencies (“enabling”), aimed at education and training

The basic types of activities for implementing the YG – as regards both funding from the national budget and under HRD OP – are precisely “enabling” measures, which help young people acquire experience and competences through apprenticeship and internship. All operations under HRD OP funded in connection with YG from YEI, publicized to date and aimed with priority at youths, contain elements related to increasing competences.

Also falling under this category are trainings in key competences and training for professional qualification, offered by EA directly or through the employment offices or through vouchers for the professional training centres. In the first half of 2016, 1,152 youths were included in training for professional qualification (Annex 1, table 5). The third type of adult training – in literacy – is carried out by schools. This is one of the basic ways of stimulating people who have prematurely dropped out of the education system to return to it, inasmuch as unemployed persons taking part in adult training are paid stipends and expenses for transportation and accommodation.

Employment offices conduct motivational trainings, meetings with psychologists, group or individual consultations: 4,680 youths have used these measures in the first half of 2016 (Annex 1, table 5). We should also mention the particularly popular Job-seeking Workshops, which many young people attend (Annex 1, table 5) and which are intended to develop key competences for finding suitable offers, filling in CVs, motivation letters, achieving adequate performance at job interviews with employers, etc.

- Structural reforms

So far, there has been no large-scale structural reform that might lead to the creation of new institutions or unification of existing ones in the sphere of the so-called “one-stop services” in connection with youth policies and YG.

The dual system of training was first introduced in Bulgaria by amendments to the Vocational Education and Training Act; this system assigns an active role to the employers in the course of education, as they take part in designing study plans and training, and in evaluating the trainees.

- Promoting labour mobility

There are no currently operating measures for labour mobility addressed solely to young people. Within the country, labour mobility is promoted through encouraging measures laid down in NEAP, which, in the experts’ opinion, are not particularly popular (experts from MLSP, LMLMP). Labour mobility in the EU is promoted through the EURES network. The operation National EURES Network is currently in course of implementation.

- Other instruments

In fulfilling NPIEYG, the employment offices apply the methodological guidelines of the Instruction for the Work of Labour Mediators with Unemployed Youth, whereby the procedures for this work have been updated in the context of YG. The previously existing individual action plans have been modified: agreements are made and responsibilities are assumed by both sides based on the individual competences of the youths, their strong and weak points, preferences, education and past experience, and individual schedules are designed (experts from EA, GDES).

C) Actors and coordination

The implementation of YG is provided for and regulated mainly in: NPIEYG, the NPIEYG framework agreement, the annual NEAP, and by HRD OP. In order to design each of these documents, a respective inter-institutional workgroup is formed, with the participation of a number of institutions, social partners, employers, trade unions, scholars, and the NGO sector. The basic organ responsible for applying HRD OP and for conducting the national employment policy and YG is MLSP. The coordinating and managing organ for applying YG is the Directorate of LMPLM, and the coordinating and managing organ for HRD OP is Directorate of European Funds, International Programmes and Projects.

The managing organs do not decide on policies, measures and operations independently of one another (experts from MLSP, LMLMP; experts MLSP, EFIPP; experts EA, DEF). **Horizontal coordination is ensured through the creation of special inter-institutional networks and organs at national and at local levels, and through the Network Agreement on NPIEYG and local agreements on cooperation.** According to the experts, these agreements have played a key role for mobilizing social partners and NGOs to work for the implementation of YG (experts MLSP, LMLMP). To ensure fulfillment, coordination and monitoring at the national level, the following were established: a Coordinating Council for Execution and Monitoring of Activities under NPIEYG (which observes the YG), a National Council for Promotion of Employment (which observes NEAP), a Committee monitoring HRD OP (which observes YEI и ESF); participating in all three structures are a wide range of stakeholders and participants from various institutions, who in most cases “are the same persons” (experts MLSP, EFIPP) – including ministers, directors of directorates, etc. (a detailed list of institutions and persons is given in Annex 2). Taking part in all of these are national and regional representatives of various institutions relevant to issues of youth employment as well as employers’, trade union and non-governmental organizations.

With regard to horizontal coordination and the partnership approach, it should be noted that important steps in this direction were taken even before YG – regional administrations and social partners (trade unions and employers’ organizations) have regularly been given the opportunity to take part with their own projects funded through the state budget. There are also the so-called coordinated operations, where different problems of one and the same person or group are resolved consecutively through their participation in operations and projects under different operational programmes.

With regard to vertical coordination, the main conclusion that emerges is that, although YG is the result of an EC recommendation and the country is free to choose specific measures for achieving it, the general end result to be achieved after policy implementation is mandatory. The changes made in YG and YEI to expand their range of coverage were the result of negotiations and grounding on the part of Bulgaria. NPIEYG was designed at national level without intervention but was revised by the EC, and the annual fulfillment of measures under YG is observed by the EC, whereby the assessment becomes part of the monitoring report for Bulgaria. It should be stressed that the EC observes and follows the general implementation of YG and not only the activities financed under YEI. The registered shortcomings and recommendations are the object of special attention and of reports and explanations given by MLSP (as one experts said, “then they examine us several times during the year... it’s really an exam – quite exactly”, expert MLSP, LMLMP). Being part of HRD OP, the expenditures under YEI is subject to even stricter control inasmuch as it is tied to the agreed upon axes and investment priorities. The designing of the operations themselves is not observed by EC and falls under the competence of MLSP and of the Monitoring Committee, but it is absolutely mandatory that they lead to the achievement of the laid down and agreed upon indicators. Inasmuch as, when designing the programme, detailed calculations were made regarding the possible activities and measures leading to fulfillment of the indicators for the axes, operations are designed or changed not arbitrarily but in view of the negotiated financial and indicative parameters.

At regional and local levels, the policies are basically coordinated and “laid down” (expert DREO) through EA, by REA and REO; however, enough good and viable forms for feedback have been provided both in the course of design and in the course of application of measures and operations, including monthly reports, regular meetings, discussions before and during the implementation of the measures, etc.

D) Quality and Innovations

According to NPIEYG, a good job proposal must meet as many **of the following criteria as possible**: to match the education/qualification of the youth, to be suited to his/her health status, to match the youth's individual profile, to offer employment security, to meet the requirements of healthy and safe working conditions, to provide the possibility for the youth's individual growth. These criteria, and the term "good job proposal", which limits the unemployed persons' option of refusing the job offer, have not been elaborated for YG but are part of the applied practice and legislation (experts MLSP, LMLMP; experts EA, DEF; experts EA, GDES). A good job proposal for youths aged 15 to 18 years must primarily be connected with return to the educational system and inclusion in continuing education, training, and apprenticeship. A good training proposal must meet as many as possible of the following criteria: to match the profile and inclinations of the youth, to be in demand on the labour market, to be tied to a specific workplace.

With regard to the lack of criteria in NPIEYG, or in the Recommendation of the Council, relevant to level of wages (a lack that is pointed out as one of the basic weaknesses of YG (ESP, 2015)), the adopted national methodology for defining the remuneration of subsidized employment under HRD OP resolves this problem through the requirement of providing no less than the minimal social security contributions threshold for the respective position (as opposed to the minimum wage used in the preceding programme period). Moreover, in the HRD OP programmes, advantages are provided for employers who guarantee payment above the minimum social security threshold and who intend to keep the youths at their jobs after the end of the programme (experts MLSP, EFIPP). All employers and training organizations must abide by the conditions for providing a good job.

Gender specifics are not taken into account in the programmes aimed at youths. However, there are separate initiatives aimed at all ages, including youths, where such issues are given a priority. The same is true regarding the issue of multiple exclusion.

The most significant **innovations** regarding policies and measures for youth employment stemming from YG can be summed up as follows: **1) the focus on NEETs**, who have so far remained outside the scope of measures and programmes for employment and integration – even though the percentage of NEETs in Bulgaria is considerably higher than the EU average (UNICEF); **2) the time framework for inclusion of youths in the initiatives**, i.e., the requirement that this should happen **up to 4 months after registration** at the employment office; **3) the requirement that operations under HRD OP should combine employment with the development of competences and that training should take into account the demand for labour force**; **4) the inclusion of dual education and the amendments**

in the regulations for professional education, internship and apprenticeship; 5) **youth mediators and youth employment mediators**; 6) operations involving application based on the project principle by consortiums of partnering institutions and organizations; 7) regulations of the participation of social partners and NGOs through the Framework Agreement and through the cooperation agreements at local level.

E) Finance and budget

Activities for the implementation of YG are funded through: 1) employment promotion measures and national programmes and projects, training of adults funded by the national budget, which are determined each year based on the annual National Action Plan for Employment; and 2) operations under HRD OP 2014-2020, funded by the ESF and YEI, of which MLSP is the managing organ; 3) operations under OP SESG (again, without mention of YG being made in the specific operations, though they are directly relevant to the strategies for labour market integration of youths). Although funding under HRD OP must be “supplementary” and should promote activities by national funding for the implementation of YG (experts MLSP, LMLMP), due to the objective impossibility of encompassing a sufficient share of youths – because “resources are limited” and “the needs are numerous, and so are the NEAP measures” (expert MLSP, EFIPP) – we find that in fact the main number of people are targeted precisely through activities under HRD OP and the supplementary measures and programmes prove to be those funded through the budget.

In the last three years, approximately 11 million euros per year have been allotted from the state budget for the implementation of NPIEYG and the youth policies laid down in the NEAP (promotion measures, national projects) (according to data from NEAP, 2014 and NEAP, 2016); the level of funding is expected to remain the same in the future.

In the period 2014–2020, considerably more resources are envisaged under HRD OP than in the preceding period. The financial resources envisaged for the implementation of YEI in the period 2014–2020 amounts to 120.1 million euros, of which 110.4 million are from the EU and 9.7 million are national co-funding. The specially allotted funds for YEI are 55,2 million euros, and the support coming from the ESF is to the same amount. Another 47 million euros are planned to come from ESF for active labour market policies aimed at youths (NEAP 2015; HRD OP 2014-2020 Bulgaria). For comparison, the funds during the period 2007-2014 were 33.2 million euros (Stoyanova, 2016:136).

Funds from YEI and ESF for active labour market policy aimed at youths fall under the framework of Priority Axis 1 Improving Access to Employment and Job Quality, and are calculated based on different investment priorities. The funds from YEI and ESF are

disbursed respectively under Investment Priority №2 and Investment Priority №3, where both priorities aim at “Sustainable integration in the labour market of young people, particularly those engaged in labour activity, education or training, including young people at risk of social exclusion and young people from marginalized groups, including by the application of the Youth Guarantee”, but with different territorial scopes. This mirror-image correspondence between the two priorities has been a purposely sought effect that permits fulfilling the activities for the whole country and for all youths – a particular feature that is assessed by experts to be a major challenge, but also as being a good practice when programming HRD OP (expert MLSP, EFIPP) and the only way to avoid discrimination of youths based on place of residence (experts MLSP, LMLMP).

The resources under SESG OP that are directly related to the labour market realization of youths under the six procedures that are currently in course of implementation amount to 36,2 million euros. It is expected that another 4 procedures will be announced by the end of 2016, amounting to a total value of 11,8 million euros.

F) Evaluation

The assessment of activities under YG are to be made with regard to the success of the separate measures and with regard to the overall successfulness of the policy; assessment is made by comparing time periods. As regards programmes under HRD OP funded from YEI and ESF, the indicators for fulfillment are laid down in EU Regulation № 1304/2013¹⁷ and include indicators for immediate results from YEI (employment/training of the participant when leaving the ESF operation) and indicators for long-term results (measurement of the effects 6 months after leaving the operation). Assessment of the current implementation is contained in the annual NEAP, in the annual EC recommendations, in the monitoring reports under HRD OP. Two analytical reports are available at this point: an on-going assessment of measures under YEI (MLSP, 2016c), and an annual report on the implementation of HRD OP for 2014 and 2015 (MLSP, 2016 a). A net assessment is planned to be made in 2017 of activities for active labour market policies aimed at youths, and an interim assessment by the EC under HRD OP is expected to be made in 2018.

Academic assessments and analyses of YG and YEI and on the efficacy of the new approaches to labour market integration of youths are lacking at present. **Results**

According to a recent evaluation of the YG implementation by the EC (EC, 2016b), YG has provided a new impetus and has accelerated policy development in Bulgaria, yet there are still significant challenges. The report states that in 2015 the YG scheme in Bulgaria reached

¹⁷ Official Journal of the European Union, issue L 347/470 from 20.12.2013.

only 14.3% of NEETs aged under 25, a decline of 5 percentage points compared to 2014. Additionally, only just over a third (35.9%) of those leaving the scheme in 2015 took up an offer within 4 months of registration, though this is an improvement compared to 2014 (27.6%) (EC, 2016b: 128). According to the report, less than a quarter (23.4%) of those leaving the YG in 2015 were known to be in employment, education or training 6 months later, a slight improvement on 2014 (19.6%), though both figures are likely to be understated as the subsequent situation was unknown for the majority of leavers (74.6% in 2015 and 78.2% in 2014). Longer-term follow-up of those leaving in 2014 shows little change in positive outcomes after 12 or 18 months (18.5% and 18.8% respectively) (EC, 2016b: 128).

On the basis of currently available data, the following conclusions may be drawn:

1. There is still a shortage of information on the Youth Guarantee and of analyses and assessments regarding the measures and activities for its implementation;
2. Overall, the short-term results regarding the decrease of youth unemployment are good (Annex 1), but the net assessments and the tracing of long-term effects are yet to be made;
3. The basic problems of labour market realization of youths continue to be their insufficient basic training and the significant mismatch between their expectations and the offered wages;
4. **Measures have been taken to regulate and expand the scope of professional training – through internships, apprenticeships and dual education. Still, the commitment of the MES for the implementation of YG is insufficient, considering the normatively defined role the ministry should play. The activity of MES will possibly be intensified through the implementation of OP SESG;**
5. The large number of early dropouts from education and the insufficient focus on “second chance”-type training (Annex 1) represent continuing challenges;
6. **Despite the increased focus in recent years on NEETs, reaching them continues to be a problem inasmuch as there is yet no effective and stable mechanism for encouraging their registration at the employment offices or their return to education; preventive measures are also insufficient. The lack of institutional contact is what makes them hard to be identified and contacted;**
7. There is a need to enhance the effectiveness of the implemented measures and to specify the conditions for the differing requirements for separate groups of youths (see the last paragraph of 3.A);

8. The horizontal integration of youth policies continues to be insufficient: there is no connection between measures against youth unemployment and measures for social integration and family support. Gender specification is also lacking.

3. Implementation of particular measures introduced/financed with explicit relation to the Youth Guarantee

A. The Youth Employment Procedure

The Youth Employment Procedure¹⁸ aims to enhance the competitive capacity of youths by ensuring opportunities for internship or training while working¹⁹, which would facilitate the transition from education to employment and would simultaneously lead to accumulation of the professional experience necessary for occupying job vacancies declared by the employer. The elements of “Youth Employment” display strong continuity with the measures from the previous programme period (expert EA, DEF; expert EA, GDES; expert DREA).

The funding is provided under YEI and ESF. The initially allotted budget is 17,9 million euros, to be aimed at 8,000 youths, of whom 7,520 live outside Sofia-city and 480 reside in Sofia (for comparison, the total number of registered unemployed persons up to the age of 29 by 30.06.2016 was 32,510, according to data from MLSP – Annex 1, table 5). Later, due to the increased interest on the part of employers, the funding was doubled, reaching 35,9 million euros, and the terms were prolonged; the expected results are also doubled.

The procedure is essentially a practical measure for direct provision. The managing organ of HRD OP is the Ministry of Labour and Social Policy (MLSP) through the Directorate of European Funds, International Programmes and Projects. The beneficiary is the Employment Agency.

Designing the operation Youth Employment is carried out by the Directorate EFIPP of MLSP, which is the managing organ, in close collaboration with the Directorate LMLMP of MLSP and EA, specifically DEF (experts MLSP, LMLMP; experts MLSP, EFIPP; experts EA, DEF). The operation is entirely subordinated to the axis and specific indicators of HRD OP. In the first stages of setting up the operation, it was discussed in DEFIPP and in informal work groups in the framework of MLSP with representatives of the other directorates and agencies, especially LMLMP and EA. At that stage, consultations were made and data from

¹⁸ Guidelines for applying and other normative documents regarding the procedure are available at: <http://esf.bg/procedures/mladezhka-zaetost-2/>, visited on 21.09.2016.

¹⁹ There are no measures providing internship for already working people. Those are measures strictly for unemployed – job first approach. In the new OP period however jobs provided in measures have to be internship or include training.

the Regional Employment Service (RES) and Regional Employment Offices (REO) were analysed in the framework of the EA. In the following stages, the ideas regarding the operation are discussed with the so-called sub-committees, a work group comprising part of the members of the Monitoring Committee working specifically on the first axis of HRD OP (experts MLSP, EFIPP), which include representatives of all the institutions and ministries dealing with employment promotion (MLSP, MES, Ministry of Regional Development and Public Works (MRDPW), Ministry of Finance (MF), social partners, etc.) and which do the actual work of shaping the operation in terms of concrete criteria for admissibility and guidelines for applying. During the last stage, the operation is discussed and approved by the Monitoring Committee of HRD OP 2014-2020, which includes stakeholders related to the whole operational programme. When the Monitoring Committee gives its approval, the application process begins, after which EA designs a project according to the criteria and guidelines; this project is approved and the actual practical implementation of the procedure begins.

The implementation of the operation is carried out at regional and national levels. At regional level, the REO and the district DEO collect and process application documents of employers and youths; at national level, the EA approves the applications and concludes contracts. Due to the large numbers of employers and youths, at the second stage of the operation the application documents are continuously accepted in the district employment offices, and the candidates are approved on an on-going basis²⁰. The EA regularly provides statistical data on the implementation of the project.

With regard to horizontal coordination, after the programming stage and the start of the actual implementation of the project, no formal partnership is envisaged. Partnership organizations are relied on when the need for information and engaging employers and youths arises. At regional level, the engaging of partners is done through partners' agreements, signed under YG with municipalities, universities, Regional Inspectorates for Education, social partners and NGOs at municipal level. The Youth Information and Consulting Centre (YICC) and the youth mediators play especially important roles. At national level, the system relies on the Framework Agreement for Implementation of NPIEYG and the stipulated obligations of ministries, administrations, social partners and NGOs represented at national level.

²⁰ The REA approve applicants in some budget funded programs. All EU funded programs are approved by the EA on central level. The change here is that at first they had a deadline and all applicants were reviewed at once - after the deadline. This took a lot of time and was not efficient, so they decided to approve applicants as they submit – one by one: first to come, first to be served.

According to preliminary data of EA, by 08.07.2016, under the Youth Employment operation, 8,661 unemployed people were engaged, of whom 4,180 were aged under 24. Out of those who had completed their internship, 824 people remained working for the same employer (according to data provided for the study: experts EA, DEF). The number of people who keep their jobs is expected to increase considerably by the end of the programme. During the past programme period, the percentage of youths who remained with the same employer **was between 40% and 50%** (expert, EA, GDES).

Similar results were obtained from the on-going assessment of measures under YEI (MLSP, 2016 B), according to which approximately 45% of the youths taking part in Youth Employment have a job after leaving the programme, while 57% have received job offers either from the employer under the programme, or from another employer, or from several employers. According to the same study, the preliminary data from the first stage regarding the net effect of Youth Employment shows the greatest difference is registered among youths without education: they have a 41% higher probability of finding work after participating in the measure; the difference made by the initiative is least among youths with higher education, for whom the effect is minimal and even negative inasmuch as the probability of finding work in the control group is 5% higher. Although, as must be stressed, these data are based on subjective expectations on the parts of the youths, the weak impact among youths with secondary education, and the lack of any impact at all among youths with higher education, is quite disturbing inasmuch as the majority of youths taking part in this type of measures fall precisely in these two groups (MLSP, 2016c: 16). One of the basic conclusions drawn from the study is that the leading factors of unsuccessful integration are “the insufficient basic training of the participants and the significant discrepancy between the expectations of employers and youths regarding wage levels” (MLSP, 2016c: 78). Other important conclusions for this analysis are: that there are cases of discrepancy between what is announced by employers and what youths actually demand, which has a negative impact on the motivation of youths; there is room for greater effectiveness and efficacy of implemented measures, as shown by the fact that “about 19% of youths cannot identify the benefits this programme might have for them” (MLSP, 2016c: 16), while some youths believe that the offered jobs are not suited to their profile with regard to various criteria; the programme does not fully meet the requirements of youths with higher education and does not have a sufficiently strong impact on improving their labour market situation.

B. The “Active” Procedure

“Active”²¹ is a practical measure aimed at activating and employment integration of youths aged up to 29 inclusive, who are not in education, training or education, including those not registered as unemployed at the EA. The operation aims to identify and motivate non-active youths from the target group for active labour market behaviour, and envisages follow-up activities for inclusion in long-term employment, training or return to education. Not all activated youths will be included in training or employment under this project – part of them will be directed to the REO where they will be registered and included in other schemas and measures. The indicators for fulfillment of the procedure are: 1) Non-active participants **aged 15 to 29 not** in training or education to be covered by project activities – 8,700 person; 2) Non-active participants aged 15 to 29 inclusive, not in training or education, who upon leaving the operation will be engaged in education/training, acquire qualification or have a job, including as self-employed – **6,500 persons**²². The budget of the operation amounts to 13.3 million Euros.

The innovative character of the programme stems from two particular features. First, this is the first time that a measure has been aimed with priority at identifying and activating NEETs; this is a direct result of YG and YEI (experts MLSP, LMLMP; experts MLSP, EFIPP). Second, in order to achieve the defined goals, the operation is carried out by projects chosen on a competitive basis, designed exclusively using the partnership approach, and including different types of institutions and organizations responsible for the different stages and activities. In the framework of a single project, this partnership approach guarantees implementation of planned activities for: identifying the economically non-active youths who are neither in education nor in training; activating non-active youths through information events, individual work with them, etc.; motivation training for active job seeking; training for acquiring professional qualification or key competences; hiring persons from the target group.

A very wide range of legal entities are admissible beneficiaries under the procedure: non-governmental organizations; organizations providing mediation services on the labour market; information centres for professional guidance; professional training centres; social partners (national representative organization of workers and employees or of employers in accordance with the Labour Code); municipalities or municipality regions (including

²¹ Guidelines for applying and other documentation, available at <http://esf.bg/procedures/aktivni/> , visited on 21.09.2016.

²² They have two targets. 8700 people are to be identified and activated, of which 6500 to be engaged in the projects. The other 2200 (probably more when it starts) after being identified, will be offered training but might not be approved/might fail the training, so they are to be brought to the REA to receive offers there.

municipalities, municipal regions and municipal enterprises under article 52 of the Municipal Property Act); employers.

The main factors in designing the operation are the Managing Organ – Directorate EFIPP – and the MLSP; here too, the ministry’s collaboration with LMLMP is of essential importance. Since the EA is not a beneficiary, it does not play an important role in preparing the operation (experts MLSP, LMLMP), but again, the employment agencies they take part by providing consultation and joining in the discussions. The mechanism is designed using generally the same mechanism – ranging from work meetings and informal discussions through work in the “sub-committee” on Priority Axis 1 to the Monitoring Committee’s final approval of the criteria of admissibility and the guidelines for applying.

The guidelines for applying and the admissibility conditions are laid down broadly enough to ensure freedom of action; this is a purposely looked for effect (experts MLSP, EFIPP). The possibility is left open to freely form teams and partnerships, to assess the budget (within the envisaged limits) and fix the number of persons who will be identified, activated, and for whom employment will be provided. **A special rule is that employers must be included in the team, who will guarantee that at least part of the youths will be hired after the end of the project (experts MTIC, EFIPP).**

With regard to vertical coordination: the implementation of the operation is led by the managing organ, Directorate EFIPP, and by MLSP. EA, through the regional employment services and the regional employment offices must support employers even after the conclusion of the projects, and orient those activated youths who are not hired under the respective project to use the measures and opportunities for labour market realization within 4 months, in accordance with the rules set down by NPIEYG (experts DRES).

At present, the operation is in implementation stage, and a total of 80 contracts of candidates have been approved and signed²³, comprising a great variety of approaches to identifying and activating youths in different spheres of employment. For instance, employment is envisaged in the sphere of emergency medical assistance, in the IT sector, in the production of electrical appliances, in public greenery and ecology, in construction, in confectionary and bread making, etc.

4. Typologization of the national approach and explanation of change (assessment of the influence of EU policy and others)

- Ensuring employment: this has been an important aspect of labour market policy both before and after YG. Traditionally, a large part of the measures are aimed precisely at

²³ List of approved contacts, accessible on <http://esf.bg/?wpdmdl=2697> , visited on 21.09.2016.

youths and include providing employment through subsidizing, hiring unemployed persons in municipal enterprises (especially related to cleaning and public greenery). For youths without qualification, being hired by municipal enterprises is the only possibility to start work.

Promoting the start of first job by providing possibility for part-time jobs or flexible work schedules has been regulated by law after 2013, but in some cases these possibilities are used by employers to conceal employment and avoid paying social security contributions and taxes; in this case, the effect of the measures is disputable.

- Social insurance / financial incentives

Although YG primarily enhances the possibilities of youths, and hence their social rights, when they are made a suitable proposal for work or inclusion in a measure, **they cannot decline it or their social benefits/unemployment relief will be discontinued.** This applies for all unemployed registered at the regional employment offices and is a way of coping with the financial crises and unemployment; the rule was initiated by an amendment in the Employment Promotion Act.

There has long been a variety of incentives for promoting the employment of parents with young children, and there are legally provided tax concessions and the right to better and alleviated working conditions and the right to training of mothers with young children.

- Assistance in finding work

This too is a traditionally important element of assistance for youths, but even though a significant number of youths are still finding jobs after registering in the employment offices, in recent years the role of these offices with regard to finding work has been decreasing, while seeking jobs through websites, HR companies, etc., is increasing. At the same time, consultancy, including psychological and motivational consultancy, is growing in importance. Job seeking Workshops and individual job seeking trainings are also gaining importance in comparison with other activities and services offered by the regional employment offices in recent years as more and more young people (and not only) attend them in order to acquire basic skills for applying for jobs.

This shift, however, is hardly related to YG, but rather to European and national initiatives for overcoming the economic crisis.

- Raising qualification

With the introduction of YG, raising qualification has become a mandatory element of operations under HRD OP and has acquired great importance for policies in general (experts MLSP, LMLMP; експ. MLSP, EFIPP). The acquirement of skills has always been emphasized in the educational system; whether this task is being pursued properly is a

different matter. Reforms are being conducted and measures applied for adapting the general education system to the demands of our times. However, only part of the changes are aimed at improving the chances of finding employment. **Recently, the emphasis has been placed on vocational training and on acquiring experience through real work during education; structural reforms and changes of regulation are being made in this area**²⁴. Though not defined in relation to YG, these changes are relevant to the labour market and are in fact a consequence of YG. Noteworthy in this respect is the introduction of dual education and the growing number of programmes of the MES under SESG OP involving internship of university and high school students during education (and, after education, programmes for unemployed under HRD OP). Continuing education, though much discussed, remains dependent mainly on the personal desires and efforts of individuals.

A problematic point is the lack of good mechanisms for promoting return to education among young dropouts. Early warning mechanisms are being elaborated, but once youths are outside the system, very little can be done to return them (experts MLSP, LMLMP).

- Target groups

Traditionally, the target groups are determined based on education and the time spent outside employment. After the introduction of YG, these two focuses have remained but a special focus on NEETs has been added (experts MLSP, LMLMP). There is also a focus, though less strong, on measures addressed to young parents.

- Governance and vertical coordination

With regard to governance and vertical coordination, both regulation and funding is highly centralized in the system of general and vocational education and with regard to youth employment and youth labour policies. In the field of education, an exception to this centralization is the relative autonomy of universities. In the field of employment, the regional branches of EA play an essential role for fulfillment of measures, and a good system has been elaborated – of a rather hierarchic type – for feedback and for influencing the system; but regular meetings and work groups are also being conducted.

- Governance and horizontal coordination

Since YG was adopted, horizontal coordination between different institutions and stakeholders has improved considerably as a result of the signed agreements and the building of networks and partnerships. This is entirely a result of YG and of policies

²⁴ Until last year the schools with dual vocational system participating in the Swiss project are 46 (out of 469 professional schools in BG – about 10%).

coming from the EU. Social partnership was very important even before YG, but the importance of NGOs has grown considerably thanks to NPIEYG and the Framework Agreement.

Horizontal coordination between employment policies and social policies has improved with the unification of the two institutions that now provide joint services, but much is left to be desired as regards work with youths. The results of this structural change are to be seen in the future.

Within the administration, access to various services is rather fragmented. Experts assess that it is practically impossible under our conditions to establish “one stop” services or expert field teams doing individual work with multiple excluded persons or NEETs (experts MLSP, LMLMP). Providing paths for dropouts’ return to education is a problem; at present, the only available measures in this respect are encouraging measures involving the provision of stipends and transportation under certain conditions. A coordinated programme is expected to start under HRD OP and SESG OP, which will provide training and employment under HRD OP; persons will first be directed to a programme under SESG OP in order to complete a necessary level of education (experts MLSP, EFIPP).

- “Hard” and “soft” forms of coordination

YG is rather a “soft” type of coordination measure, since Bulgaria is entirely free to define the means of applying the measure and to design the implementation plan, NPIEYG, without extraneous intervention. At the same time, however, since the country is under monitoring, after the adoption of NPIEYG, the removal of weaknesses registered in the monitoring reports is observed strictly and successes or failures require detailed and regular explanation before the EC (experts MLSP, LMLMP).

With regard to inclusion of social partners and NGOs in the designing and application of YG, the principle applied is stipulated in the Employment Promotion Act, according to which the policies, strategies and plans for promoting employment (for instance, NEAP) are elaborated with the participation of as large as possible a circle of stakeholders, including these organizations.

- Results

Most generally, the results to date indicate definite progress in employment policies and a considerable decrease of the unemployment rate among youths. The same, however, cannot be said with regard to decreasing early dropout from education of youths (Annex 1, table 1). It is still too early to make long-term and net assessments of the policies.

5. Policy recommendations

On the basis of data and analyses of activities and measures under NEAP, YEI and ESF for implementing YG and improving youth's labour market integration, and on the basis of critical analysis of the existing assessments and analytic texts that deal with active labour market policy²⁵, it is important to draw the following recommendations:

1. A better selection of measures and programmes needs to be made in order to respond as best as possible to the different demands and characteristics of the various sub-groups of unemployed youths. According to an analysis by the Institute of Market Economy (IME), even the normative and documentary preparation of such programmes is challenging, since for instance the labor and social rights of persons aged 15 and those aged 22 are very different (IME, 2014). The same is true regarding the NEETs group, which comprises youths of very different status, levels of economic activity and labour market behaviour (UNICEF, 2015). Approximately 50% of the NEETs are economically inactive and the focus on this group is insufficient. **It also is necessary to additionally adapt the measures, especially to the specific needs of youths in higher education – the preliminary net assessment, based on the interim assessment of YEI activities, shows a zero, or even negative, effect among youths at this level of education (MLSP, 2016c).**

2. With regard to designing more effective measures, it is crucially important to collect additional information on economic activity and on the state and needs of specific sub-groups by conducting additional studies, observations among the labour force, in order to improve the functionality of the information system of the EA, etc.

Although there is a stronger focus on ensuring long term employment in recent years, including with specific mechanisms to be implemented in practice, sustainability is still a problem. The jobs/sectors offers approved in measures in their majority do not suggest sustainability. It is necessary to go on to a qualitative model of assessment of policies, a model based not only on the number of employed persons under separate programmes **but also on long-term analysis of economic activity and employment of included persons.** Moreover, it is necessary to regularly trace the success of the different instruments in order to make timely corrections and subsequent adaptations to the particularities of the target groups, the partner organizations and the social-economic context (MLSP, 2016a).

²⁵ Since part of the observations and conclusions are valid not only for youths, and not only for the time period since YG was introduced, this report also analyses texts from previous periods and texts on general labour market policy.

3. Greater efforts should be made to raise interest in participation in the activities and measures under YG through better information provision and through different channels of impact and information, but also to improve the mechanism of impact of the measures by facilitating the application procedure for employers and by designing administrative measures for control on the offered jobs. **According to data from the interim assessment of YEI, the discrepancy between the functional obligations of the declared job vacancy and the actual requirements of the employer is one of the reasons why part of the youths drop out of the programmes (MLSP, 2016B).**

4. The data on the educational characteristics of unemployed youths in Bulgaria prompt the conclusion that the main efforts should be oriented *to keeping young persons in the education system and raising the qualification of persons with basic or lower than basic education (IME, 2014)*. Also, inasmuch as measures under YEI have a considerable positive effect precisely on youths with basic or lower education (MLSP, 2016a), mechanisms should be provided for more intensive inclusion of such youths in the procedure, including youths who are long-term unemployed, youths with disabilities, and/or youths of Roma origin (EC, 2016b). The key problem here is the undervaluation of the role of education an MES.

Table 1: Typologizing Youth (Employment) Policies

(broadly based on Bonoli 2010; Dingeldey 2011 and Graaf/Sirovátka 2012)

POLICY OBJECTIVES	before 2013			2016			Change influenced by	
	strong	medium	weak	Strong	medium	weak	YG	other
Work first approach Flexible forms of employment as ‘bridge’ Pricing young workers into jobs: age-related (minimum) wages			X		X		X	X
Occupation job subsidies public employment Other	X			X				
social security/financial incentives - familialized support (parents plus/without child allowances etc.) - individual social transfers - transfers during educational attainment - in-work or /in-education benefits		X			X			
- sanctions for non-compliance		X		X				
employment assistance short term measures such as: placement services, counselling		X		X				X
Upskilling/enabling Encouraging training/ formation of human capital as long-term measure - within general school system - within vocational training system - as further training in general and/ or as a particular part of employment policy pathways back to education Other		X		X			X	
Target groups	X			X				

- according to educational level								
- NEETs			X	X			X	
- People with migration background			X			X		
- young parents		X			X			
- women			X			X		
- long unemployed	X			X				

	before 2013			2016			Change influenced by	
	strong	medium	weak	Strong	medium	weak	YG	other
GOVERNANCE and vertical coordination								
Centralization of/most relevant level of regulatory competences - General education - Vocational training - Youth employment policy	x			x				
Centralization of funding/most relevant level of funding for - General education - Vocational training - Youth employment policy	x			x				
Forms of cooperation between actors on vertical axes - hierarchy	x			x				
- negotiation, network		x						
Relevance of non-state actors ^a		x			x			
GOVERNANCE and horizontal coordination								
vocational training system as intermediary institution between school and work			x		x		x	
...between different policy fields - organized/institutionalized school-to-work transitions			x		x		x	
- employment policy and youth welfare policy		x		x			x	
- employment policy and family policy			x			x		
- alternative paths from work back to education			x		x			
...within administration								
- fragmented access to different services/transfers	x				x			x

- creation of one-stop institution/single gateway			X		X			
Forms of cooperation between actors on horizontal axes								
hierarchy	X			X				
market			X			X		
negotiation, network (i.e., social pacts)			X	X			X	
Relevance of non-state actors ^a		X		X			X	

	before 2013			2016			Change influenced by	
	strong	medium	weak	Strong	medium	weak	YG	other
Governance ‘hard’ or ‘soft’ forms of coordination								
○ employment/educational guarantee as social right (binding)			X		X			
○ involvement of social partners/ other non-state actors ^a				X			X	
- designing youth guarantee								
- implementing youth guarantee								
as mandatory (law) /informal /no involvement				X				
OUTCOMES								
Improvement of								
○ youth unemployment			X		X			
○ NEET rate								
○ Educational attainment (stratification) by gender/migration/early parenthood			X			X		
○ Segmentation of labour market - distribution of flexible forms of employment - low wage employment - according to sector/profession - according to age and gender								

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Annex 1

National goal	2013	2014	2015	2020
Employment rate of population aged 20-64 years	63.5%	65.1%	67.1%	76%
Decrease of unemployment among youths (15-29 years)	21.8%	17.7%	14.4%	7%
Share of early dropouts from education	12.5%	12.9%	13.1%	11%
Share of people aged 30-34 with completed higher education	29.4%	30.9%	32.1%	36%

Data: Eurostat²⁶

	<i>Jan. 2015</i>	<i>Feb. 2015</i>	<i>March 2015</i>	<i>April 2015</i>	<i>May 2015</i>	<i>June 2015</i>
registered unemployed youths up to 24 years (number)	25427	25302	25198	23176	21060	20024
registered unemployed youths up to 29 years (number)	59775	59168	58862	54924	50630	47781
registered unemployed youths up to 24 years (as share of all registered unemployed)	7	7	7	6,6	6,3	6,3
registered unemployed youths up to 29 years (as share of all registered unemployed)	16,4	16,4	16,3	15,7	15,3	15,1
	<i>Jan. 2016</i>	<i>Feb. 2016</i>	<i>March 2016</i>	<i>April 2016</i>	<i>May 2016</i>	<i>June 2016</i>
registered unemployed youths aged up to 24 years (number)	20672	19376	16503	14601	12953	12372
registered unemployed youths aged up to 29 years (number)	51153	47599	41349	37549	33979	32510
registered unemployed youths aged up to 24 years (as share of all registered unemployed)	6,2	5,9	5,1	4,8	4,5	4,5
registered unemployed youths aged up to 29 years (as share of all registered unemployed)	15,3	14,4	12,7	12,3	11,9	11,9

Data: MLSP (supplied for the study)

²⁶ Cited from MF 2016. Europe 2020: National Reforms Programme, up-dated 2016, p. 39

Table 3: Percentage of NEETs aged 15-24 by regions

GEO/TIME	2011	2012	2013	2014	2015
European Union (28 countries)	12,9	13,2	13,0	12,5	12,0
Bulgaria	21,8	21,5	21,6	20,2	19,3
Severozapaden	34,5	35,9	33,9	34,0	33,6
Severen tsentralen	25,6	24,6	23,0	22,1	22,2
Severoiztochen	23,7	23,8	24,4	20,8	18,6
Yugoiztochen	27,5	28,1	28,1	28,0	27,8
Yugozapaden	11,4	10,2	11,3	10,6	10,4
Yuzhen tsentralen	25,1	24,6	25,0	21,7	19,4

Data: Eurostat²⁷**Table 4: Unemployed youths aged 15-24 by regions (%)**

GEO/TIME	2011	2012	2013	2014	2015
European Union (28 countries)	21,8	23,3	23,8	22,2	20,4
Bulgaria	25,0	28,1	28,4	23,8	21,6
Northwest	31,8	30,0	32,0	27,7	31,7
North central	29,4	33,7	29,3	24,9	23,3
Northeast	30,1	36,1	33,0	22,6	20,5
Southeast	28,0	33,4	30,7	28,6	29,7
Southwest	16,0	17,3	20,6	16,8	14,7
South central	31,6	33,4	34,1	28,9	22,8

Data: Eurostat²⁸**Table 5: Unemployed youths aged 15-24 by regions (in thousands)**

GEO/TIME	2011	2012	2013	2014	2015
European Union (28 countries)	5 342,5	5 625,1	5 628,9	5 149,8	4 651,2
Bulgaria	63,5	69,7	65,1	47,6	39,6
Northwest	7,8	6,8	6,7	5,6	4,9
North central	8,2	8,7	6,9	5,1	4,4
Northeast	10,0	13,5	11,6	6,5	5,5
Southeast	9,4	11,3	9,1	7,8	7,6
Southwest	14,7	14,4	15,6	10,1	8,7

²⁷ <http://appsso.eurostat.ec.europa.eu/nui/submitViewTableAction.do> , посетено на 20.09.2016г.²⁸ http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=lfst_r_lfu3rt&lang=en , посетено на 20.09.2016г.

South central	13,4	15,1	15,3	12,5	8,4
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Data: Eurostat ²⁹

Table 6: Activities for Youth Guarantee under NEAP 2015 and 2016

Indicators	1 - 6 2016		1 - 6 2015	
	Youths aged up to 29 inclusive	of them: Youths aged up to 24 incl.	Youths aged up to 29 incl.	of them: Youths aged up to 24 incl.
All registered by 30 June	32 510	12 372	47 781	20 024
Registered for a period of up to 4 months	15 462	6 075	19 247	8 485
Newly registered youths in the month of June	6 126	2 670	8 834	4 570
Included in consultancy and support for seeking jobs – unemployed with offered service, including newly registered with prepared individual action plans	63 057	26 372	139 501	69 440
Included in professional qualification training	1 152	509	180	72
Began work under employment measures funded from the state budget	228	115	1 585	880
Began work under employment programmes funded from the state budget	1 319	215	2 954	1 208
Began work under HRD OP	15 424	6 772	9 014	4 715
Began work on the initial labour market	21 517	8 080	42 164	17 070
Number of conducted youth job fairs	20		17	
Number of youths participating in job fairs	2 394	769	4 804	1 361
Number of youths who began work after participating in job fairs	279	98	4 245	887
of them – registered at DEO	212	72	2 870	270
of them – not registered at DEO	67	26	1 375	617
Work shop for job seekers	14 632	6 356	12 355	6 413
Individual consulting by case managers	887	429	658	313
Individual psychological support	828	378	840	380
Group consultations for psychological support	2 965	1 271	1 516	506

Data: MLSP (supplied for the study)

²⁹ http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=lfst_r_lfu3pers&lang=en , visited on 20.09.2016.

Table 7: Information from youth mediators appointed in municipalities with a high number of NEETs

		May 2015		May 2016	
<i>Identifying, reaching and activating youths NEET and not registered in the Employment Offices</i>		<i>15-29</i>	<i>15-24</i>	<i>15-29</i>	<i>15-24</i>
1.	<i>Number of identified non-active youths</i>	200	129	586	338
2.	<i>Number of contacted youths</i>	397	286	1097	740
3.	<i>Number of youths to whom information and/or consulting was provided</i>	349	263	955	641
4.	<i>Number of youths assisted when contact was made with the organization/institution to activate them</i>	134	92	494	372
5.	<i>Number of activated youths</i>	100	61	305	229
	including those registered at the Directorate Employment Office (DEO)	99	61	176	110
	- began work through mediation of DEO	14	8	60	50
	- began work without mediation of DEO	15	7	129	115
	- included in training through mediation of DEO	1	0	13	13
	- included in training without mediation of DEO	4	4	54	52
	- included in education	4	4	1	1
6.	<i>Number of made contacts/conducted meeting for joint work with NGO representatives and other institutions/organizations</i>	102		242	
7.	<i>Number of joint activities carried out with NGO representatives and other institutions/organizations</i>	23		86	
*the data are generalized on the basis of information provided by the youth mediators themselves.					
**it should be had in mind that in May 2015 a total of 56 youth mediators were working, which in May 2016 they were 95					