



# Challenges for Organising and Collective Bargaining in Care, Administration and Waste collection sectors in Central and Eastern European Countries

## Bulgaria: Central Public Administration

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Co-funded by the  
European Union



Sofia

November 2024

Funded by the European Union. Views and opinions expressed are however those of the author only and do not necessarily reflect those of the European Union or the Philosophy and Sociology, Bulgarian Academy of Sciences. Neither the European Union nor the Institute of Philosophy and Sociology can be held responsible for them.



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## 1. Methodological preface

The research used to prepare this national report on the Central Public Administration (CPA) is based on desk research and interviews with relevant stakeholders. The desk research and five interviews were carried out between 11 February and 1 April 2024 in accordance with the interview guidelines provided by the coordinator. The selection of respondents, representing the legitimate participants and representative areas in the social dialogue - involved in the interviews, is based on the classification of economic activities adopted in the European Union (EU) and Eurofound (Kerckhofs, 2017) report on the representativeness of European social partner organisations in the central state administration.

There is no standard definition of central public administration (CPA) in Bulgaria. The national report outlines the specifics of the national legal framework and the structure of the CPA in Bulgaria, according to the current legislation of the executive authorities, defined in Article 19 of the Law on Administration (LA).

The interviews were conducted with relevant trade union representatives at national and regional level (see Table 1 below). The respondents include high-level representatives of the main members of CL Podkrepa: SAS Podkrepa, National Federation of Trade, Services, Customs and Tourism (TUKOT Podkrepa) and Syndicate Regional Structure Gabrovo (SRS Podkrepa Gabrovo); two trade union leaders from the National Statistical Institute and the Employment Agency who are members of SAS Podkrepa; and a representative of the main member of the Confederation of Independent Trade Unions in Bulgaria (CITUB - KNSB).

The structure of the report includes a presentation of the central government administration sector, an analysis of the relevant social partner organisations in Bulgaria and an assessment of the effectiveness of social dialogue in this large and important sector.





## 2. Sketching the context

There are several definitions of public administration in the academic literature. For the purposes of this analysis, I use the OECD's definition of the 'general government sector', which includes different levels of government (ministries, agencies, departments controlled and financed by public authorities, as well as NACE 84, which includes central, regional and local government). In practice, public administration is seen by society as a set of separate functions: administrative services to the population, planning, financing, passport system, protection of public order, fight against crime, health care, education, regulation of road traffic, etc.

**The CPA in Bulgaria comprises central and territorial units of public administration.** The central administration (Figure 1), carries out the general state policy (executive power), and the territorial administration (Figure 2), also belongs by law to the administrative structures and activities, because along with issues of local importance it carries out the general state policy on the ground (in the regions and districts). **The Law on Administration in Bulgaria (LA) defines the executive authorities as central and territorial.** Therefore, this report is based on the concept of "public administration" as defined by NACE 84, which includes central, regional and local government.

The status of employees in both types of public administration includes those employed in the civil service, as defined by the Civil Service Act (CSA), and those employed on a contractual basis, as defined by the Labour Code. The public administration covers a huge number of domains and issues related to the life of citizens (from their birth to the death) and their relationship with state and local institutions, the structure and functions of administrative bodies, the basic tasks of state and local government, the administrative rights and obligations of citizens and ways of their implementation.

There are two main characteristics of public administration in Bulgaria.

First, based on Article 5 of the Law on Public Administration, the administration is divided into **general and specialised** according to the distribution of the activities carried out in support of the state authority. The general administration supports the implementation of the powers of the state authority as the head of the relevant administration, creates conditions for the implementation of the activities of the specialised administration and performs the technical activities of the administrative services.



The specialised administration supports the implementation of the powers of the state authority in relation to its competence. For example, the Agency of Employment is a general (also called central) administration and it's 28 territorial structures - Labour Offices - are defined as a specialised administration. The same situation could be observed in the Road Infrastructure Agency. There are 28 regional road units. These regional road administrations are specialised territorial units that ensure the performance of certain functions of the Agency on the territory of an administrative region.

Second, according to Article 19 of the Law of Administration (LA), the bodies of the executive power are **Central and Territorial**<sup>1</sup>. The central bodies are the Council of Ministers, the Prime minister, the Deputy ministers and the territorial bodies are the regional governments (*oblastna administrazia*) and the mayors of the municipalities (*kmetove na obshtini*)

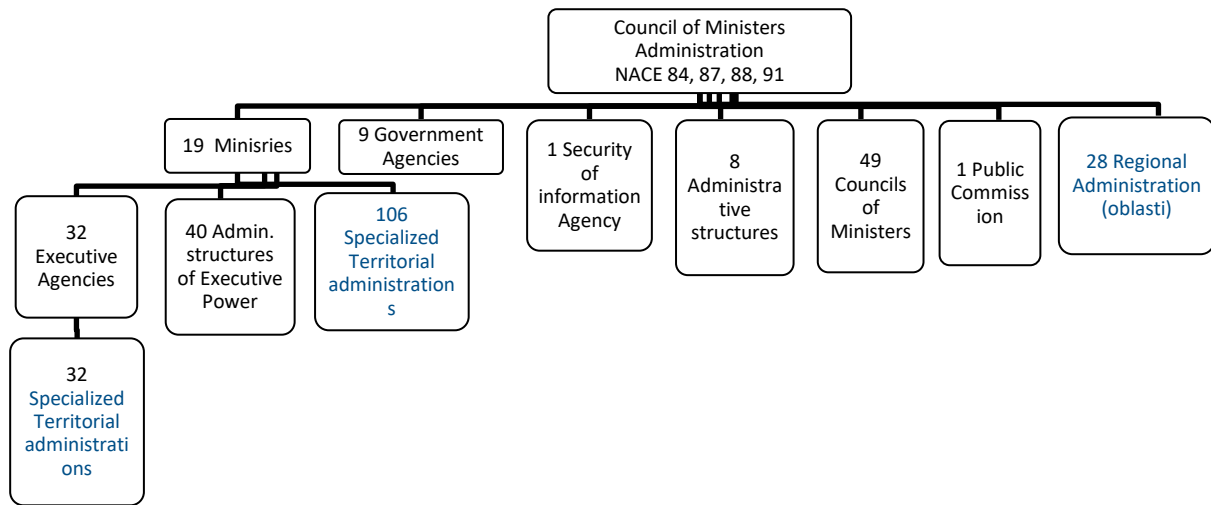
The definition and scope of the sector at the national level and in the study correspond, as illustrated below.

According to the Bulgarian legislation, the CPA is defined and understood as **the central administration of the executive power and includes**: 1. The administration of the Council of Ministers; 2. The ministries; 3. The state agencies; 4. The administration of the state commissions; 5. The executive agencies; 6. The administrative structures established by a normative act, which have functions in connection with the exercise of executive power. (2) **The territorial administration of the executive power includes**: 1. the regional administration; 2. the municipal administration/city halls; (Art. 38 of the Law of Administration).

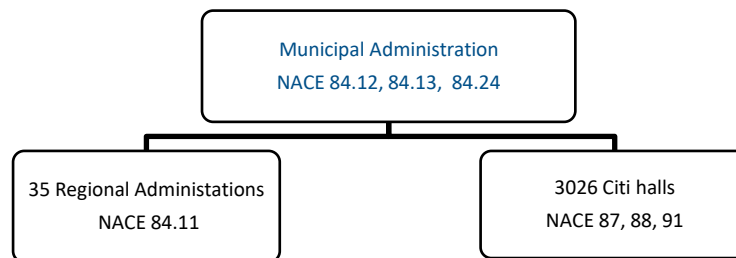
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<sup>1</sup> : Structure of the executive authority [Структура на изпълнителната власт \(government.bg\)](http://government.bg)

**Figure 1 Central administration of executive power in Bulgaria <sup>2</sup>**



**Figure 2 Territorial administration of the executive power in Bulgaria**



Source: *Integrated information system of central public administration<sup>3</sup> accessed 26/04/2024*

*The territorial structures of the CPA are shown in blue.*

The different levels of public administration reflect the structure of executive power. The comparison between the central public administration in Bulgaria and the NACE code **classification shows the following coverage in NACE 84 (11, 12, 13, 24, 25), 87, 88 and 91**: The administration of the Council of Ministers (executive branch) is organised into: 19 ministries; 9 government agencies; 1 administration of state commissions under the Council of Ministers; 8 administrative structures created by law and functioning under the Council of Ministers; 49 Councils of Ministers - one of which is the National Council for

<sup>2</sup> : [Lex.bg](http://Lex.bg) - [Закони, правилници, КОНСТИТУЦИЯ, КОДЕКСИ, ДЪРЖАВЕН ВЕСТНИК, ПРАВИЛНИЦИ ПО ПРИЛАГАНЕ](http://Lex.bg)

<sup>3</sup> : [Структура на изпълнителната власт \(government.bg\)](http://government.bg)





Tripartite Cooperation (*Natzionalen savet za tristranno satrudnichestvo - NSTS*), which includes two representatives of the Council of Ministers, two representatives of trade union organisations and two representatives of employers' organisations; 1 Public Commission and 28 regional administrations (so-called "oblasti"), which cover the administrative-territorial division of the country.

Under the 19 ministries there are 32 executive agencies, including the Employment Agency, the National Revenue Agency (NRA), the Registry Agency and the Road Infrastructure Agency. In addition, there are 40 other structures established by normative acts that exercise executive power, as well as 106 specialised territorial administrations, such as the Regional Health Inspectorates, the Regional Management of Education, the Regional Directorates of Agriculture and the Regional Environmental and Water Inspectorates.

Another part of the executive power of the state is the municipal administration with its 265 municipalities (*obshtini*).

In Bulgaria, an Integrated Information System of the Central Public Administration (CPA) has been implemented, which outlines the structural framework of the CPA sector and the services provided to society by each unit of the central public mechanism. The Administrative Register in Bulgaria serves as a unified model for the organisation of the administrative structure of the executive power and is an integral part of the CPA. This register ensures transparency, accessibility and coordination within the state administration by keeping records of information on all administrative structures. Last but not least, it should be pointed out that there is a significant overlap with NACE 84.11 General public administration and the care sector for Bulgaria, as, for example, residential care activities under NACE 87 and social work activities without accommodation 88 are included in the CPA, but for the purposes of this research, the interviews in the CPA national report will not include respondents representing these groups and will focus on the central administration and, more specifically, on state agencies, executive agencies, regional administration and local administration.

The main function of the state is to maintain social security, especially in the context of the ongoing polycrisis. Over the past decade, Bulgaria has experienced a clear political instability, which has been expressed in a turbulent change of regular and caretaker cabinets. In the period 2013-2024,

there were eight official changes of caretaker governments (Marin Raykov, Georgi Bliznashki, Ognyan Gerdzhikov, Stefan Yanev 1, Stefan Yanev 2, Galab Donev 1 and Galab Donev 2, Dimitar Glavchev) and five regular governments - Plamen Oresharski (2013-2014), B. Borisov 2 (2014-2017), Borisov 3 (2017-2021), K. Petkov (2021-2022) and N. Denkov (2023-2024).

**Table 1 Public administration CPA**

	Type of administration	Number 2021	Number 2022
<b>Central administration</b>	Council of Ministries Administration	1	1
	Ministries	17	19
	Government Agencies	10	7
	State commission's administration	4	4
	Executive Agencies	29	32
	Administrative structures established by a normative act which have function in connection with the implementation of the executive power.	54	53
		<b>115</b>	<b>116</b>
<b>Territorial administration</b>	Regional administration - district / oblast	<b>28</b>	<b>28</b>
	<b>1. Municipality administration – city hall / obshtina</b>	265	262
	<b>2. Municipality administration - regional</b>	35	35
	<b>3. Specialized territorial administration</b>	144	144
		1+2+3	<b>472</b>

Source Доклад на Министерски съвет за състоянието на [DSA\\_2022AR.pdf](#) ([government.bg](#))

Despite periods of political turbulence, the core structure of the public administration has remained intact and resilient. While there have been changes in specific ministries, the basic framework of public administration and industrial relations has remained largely unchanged. For example, according to the Annual Report on the State of the Administration for 2022, only one new administrative structure, the Executive Agency 'Infrastructure of Electronic Government', has been established. While the main structure



remains the same, there have been internal reorganisations in some of the executive agencies. For example, in the Employment Agency, nine regional employment offices were closed and replaced by two new territorial divisions - six sectors for 'verification' and six sectors for 'monitoring and control', aligned with the NUTS-2 statistical regions. These internal structural changes did not affect employment within the Agency, as existing staff and experts were redeployed to the new structures.

### 3. General characteristics of the sector

#### 3.1. Regulatory framework

The **national legal framework** regulates the sector through several laws: the Constitution of the Republic of Bulgaria, the Law of Administration, the Administrative Code, the Administrative Procedure Code, the Regulation on the Administrative Register and the Civil Service Act (CSA). The CSA, adopted in 1999, regulates the establishment, content and termination of the employment relationship between the State and civil servants during their term of office and at the end of their civil service.

A civil servant is an individual who, by virtue of an administrative appointment, occupies a paid position within the state administration and assists a state body in the performance of its functions. Civil servants may also include individuals who have been granted the status of civil servant by a special law, provided that they meet the requirements set out in that law (CSA).

Employment in the Central Public Administration (CPA) in Bulgaria is regulated by two laws. On one hand there is the Civil Service Act (CSA) for civil servants and on the other hand there is the Labour Code (LC). These legal differences are reflected in their respective contracts, but also in their respective trade union rights. Both categories can be members of a trade union (the right of association), but only those employed under the Labour Code have the right to engage in collective bargaining. When trade unions negotiate collective agreements with employers in the Central Public Administration (CPA) and conclude agreements, the different employment statuses translate into different rights for workers compared to civil servants. The different legal employment statuses are reflected in different types of collective bargaining agreements (CLAs). There is the Collective Labour Agreement (CLA - 'KTD') for employees covered by the Labour Code and



Agreements ('Sporazumenie') for those covered by the Civil Service Act (CSA). The CLA is based on broader labour rights, as the articles of the Labour Code are discretionary, allowing both sides to improve their positions through social dialogue. In contrast, the articles in the Civil Service Act (CSA) are imperative and reflect the authority of the state, which limits the scope for variation in behaviour. Imperative norms are primarily characteristic of public law, and this also applies to labour issues.

The Administrative Law regulates the structure of the administration, its basic principles of organisation, positions within it and the basic requirements for employment. It also defines the powers of the executive authorities and outlines the structure and organisation of their administrative activities.

### **3.2. Basic information on functional and territorial organisation of the CPA**

The functional organisation of the CPA in Bulgaria includes 1. Council of Ministers - administration; 2. Ministries - administration and administration of the executive power.

The territorial state administration of the CPA is organised within a two-tier system. 1. Municipalities (local government, so called "obshtini"), which are the main administrative units on the territory of the country and are regulated by the Law on Local Self-Government, Local Administrations, and 2. Regional administrations, called "oblastna administracia", represented by a regional governor ("oblasten upravitel").

They create a system of self-government and state administration bodies. The municipalities (*obshtini*) have powers in areas such as property management, finance, education, health care, culture, improvement and communal activities, social assistance, environmental protection and others. Citizens in municipalities can get directly involved in solving local problems. 2. The regional administrations - (*oblasti*) are the second level of the administrative-territorial structure. They are larger territorial units that unite several municipalities into one district (*oblast*). Activities of general interest to the whole area, such as infrastructure, education, health care and others, are carried out in the districts (*oblasti*). **The districts are important for coordinating activities between municipalities and the central state administration.** This two-tier system of local government ensures optimal decentralisation and democratisation of state administration in Bulgaria.



### 3.3. Volume and structure of employment by key socio-demographic characteristics, structural characteristics of employers, contractual structure of employment

According to the annual report of the Council of Ministers on the state of the administration for 2022, the number of people **employed in the sector is 143,815. (107 079 in the central/functional administration and 36 736 in the territorial administration)**. The number of municipal and regional administrations within the territorial administration is 28 129. The number of positions in the activity Municipal Administration financed by own revenues is 5 660. The number of vacant posts is 12 171.

The National Statistical Institute (NSI) regularly publishes statistical data on employees in the administration of executive power who are under servant relationship and labour contract. This information does not include data on employees in the Ministry of the Interior and the Ministry of Defence. Due to the characteristics of the NSI's methodology, the data are incomparable with those of the Integrated Information System of Public Administration (IISDA). **According to NSI data to December 2023, the list of employment in the administration of executive power is 98 407, 56 314 in central administration and 42 093 in territorial administration.**

The annual rate of employment in 2022 in the CPA in Bulgaria indicates that there is a **tendency for a stable level of employment and a small increase** over time. In January 2022 the number of employees in the sector was 97 628 and in December 98 343. In January 2023 - 98 280 people were employed and in December 98 407. According to NSI data, for the fourth quarter of 2022, **the total number of employees in the country is 3 197.1 thousand.**

If we compare the number of employees in the public administration with the total number of employees in Bulgaria, it amounts to about 4.5%. The table below presents basic data on the structure of the employed workforce, the actual number of employees and their percentage ratio according to various criteria.

**Table 2 State and dynamics of working conditions.**

Category	Number	%
<b>Employed staff numbers distributed by gender</b>		
Female	67 037	50.92%
Male	64 607	49.08%
<b>Actual employed employees by type of the legal contract</b>		
Civil servants	88 592	67.11%
Employment relationship Labour code	43 413	32.89%
<b>Actually employed employees distributed by education</b>		
Employees with higher education	83 399	63.18%
Employees with secondary education	48 124	36.46%
Employees with primary education	479	0.36%
<b>Actually employed employees distributed by age</b>		
Employees in an age of 29 years included	7 750	5.87%
Employees in an age of 30 to 59 years	111 705	84.60%
Employees in an age of 60 and over 60 years	12 579	9.53%

Source: Administration of the Council of Ministers, IISDA

The CPA employs 5,398 people with permanent disabilities and **reduced working capacity (4.10% of the employed positions in the administration)**, of which 265 were appointed in 2022.

The Civil Service Act regulates various methods of filling positions in the state administration, including the establishment of new service relationships or the modification of existing ones. This approach serves as a means of ensuring the career development of employees. The primary method of securing employment within the relevant administration, as defined in the Civil Service Act, is through a competitive procedure. In addition, redeployment within the same administration serves as a means of career development for civil servants. This can be done horizontally, by occupying a position at the same official level but in a different field of activity, or vertically, by occupying a higher position, provided that prior written consent for the occupation has been obtained.





According to the National Institute for Conciliation and Arbitration (NIPA) - a national agency of the Ministry of Labour and Social Policy - the number of **collective agreements (CA) in the CPA is 121, covering around 83,094 employees as of 26 March 2024.**

According to a representative of the Trade Union Federation in the Central Public Administration (CPA), collective agreements cover more than 90% of the basic trade union organisations. It is important to note that the figures from the NIPA include not only members of unions in the CPA, but also other unions that have members in the central public administration. Table 3 therefore shows the distribution of trade union organisations with members in the CPA.

The national trade union density trend for 2012 is 275,762 members of CITUB and 91,738 members of CL Podkrepa. Since the beginning of the post-communist transition, there has been a trend of decreasing trade union membership - from 80% in 1990, 42% in 1993, 20% in 2007 and 15% in 2022 (Kirov 2019). This suggests that the national trade union density is not high (estimated at around 12-15%), but based on NIPA information for public administration and Defence, it is much higher for this sector compared to the national level.

The accuracy of this data cannot be confirmed by extracting the collective agreement coverage of the Central Public Administration (CPA) from the associations with members in the public administration, as this data has never been the subject of a cross-sectoral survey in Bulgaria. The challenge arises from the fact that the CPA sector is spread across at least eight major affiliates of the two national trade unions (confederations), with only two of them - SAS Podkrepa and FNSDUO CITUB - collecting relevant data on membership in the CPA. SAS Podkrepa reports a membership of around 7,000 individuals, but relevant data on FNSDUO membership could not be obtained as they refused to formally participate in the survey. While these two unions are not the only ones with members in the Central Public Administration (CPA), others have not separated CPA employees from their total membership figures. This obstacle makes it impossible to provide accurate data on CPA membership in Bulgaria. Other trade union organisations with members in the CPA include:

**Table 3 Trade union organizations with membership in CPA**

	<b>Trade union organizations with membership in CPA</b>
<b>1.</b>	SAS CL PODKREPA
<b>2.</b>	FNSDUO CITUB
<b>3.</b>	Defence – PODKREPA
<b>4.</b>	Federation Culture PODKREPA
<b>5.</b>	F CIW PODKREPA
<b>6.</b>	Federation of trade, services, control bodies and Tourism PODKREPA
<b>7.</b>	Federation of Agriculture and Forestry PODKREPA
<b>8.</b>	National Trade Union of Firefighters and Rescuers "Ogneborets" (NSPS "Ogneborets") CITUB
<b>9.</b>	Trade union of "Road Work" CITUB
<b>10.</b>	Federation of Independent Agriculture trade unions CITUB

This is due to the methodology of the procedure for counting the number of members in order to obtain national recognition of trade union representativeness (Article 34 of the Labour Code), which takes place every four years. Each confederation reports the total number of its members, rather than the number of members within the Central Public Administration (CPA). As a result, no additional intersectoral counting has been carried out so far.

As of 30 November 2023, the labour cost per hour worked per employee with a labour contract or civil servant relationship in the CPA in Bulgaria in 2022 was BGN 19.53, which is less than EUR 10. This is according to data from the National Statistical Institute (NSI) in Bulgaria. By comparison, the labour cost per hour worked per employee was 30.5 euro in the EU and 34.3 euro in the euro area. This indicates that labour costs in Bulgaria are significantly lower than the average in both the EU and the euro area.

According to the European Commission's annual report for 2022, there was a significant negative growth in real net wages on 1 July 2022 compared to 1 July 2021, with a decrease of 9.6%. Real net wages are calculated by taking





gross wages and reducing them by the amounts due for social security contributions and income tax. These adjusted salaries are then further adjusted for inflation.

According to Eurostat's methodology, the inflation index as of 1 July was 14.8%. This means that real net wages decreased by 9.6%, even after taking into account the inflation rate of 14.8%. This indicates a significant decline in the purchasing power of employees across the EU Member States during this period.

As of 31.12.2022, the total number of all employees under the main establishment plan in the administration is 132 005, and the total number of employees with terminated relations is 11 055, which represents a turnover of 8.37%. The highest turnover is in the regional administrations - 43.54%, followed by the administrations of the State Commissions - 20.97%, and the Council of Ministers - 20.77%. The trend from previous years remains that one of the administrations with the lowest turnover is the ministries - only 6.11%.

One interpretation could indeed be that people perceive state employment as offering greater job security compared to the private sector. The administrative system within the public sector is often seen as more conservative and stable, which makes employees feel more secure in their positions. In addition, the turnover rate may primarily affect new entrants to the public sector rather than those who have been employed in the public sector for a longer time period. This could be due to several factors, such as the nature of entry level positions, differences in job expectations or the attractiveness of other opportunities. Overall, the perceived job security and stability offered by public sector employment compared to the private and self-employed sectors may contribute to the lower turnover rates observed in the public sector.

**The current structure of employment in economic activities in Bulgaria is characterised by lower than the European average shares of employment** in public administration, education, human health care and medico-social care with accommodation and social work.

### **Additional information related to social dialogue (SD)**

The regulatory framework of the CPA covers a wide range of activities, which means that trade union representation is split between several main members or federations of the nationally represented trade unions in Bulgaria, namely CITUB and CL PODKREPA. This fragmentation makes it difficult to accurately estimate trade union density within the CPA.



The lack of data on the membership of individual trade union sections/organisations belonging to different confederations makes it difficult to accurately determine trade union density within the CPA. This lack of specific information also extends to estimating the total membership of the central administration across the different federations and confederations in Bulgaria.

The lack of timely information on trade union membership from federations and confederations makes it difficult to understand the extent of trade union representation in the CPA and hampers efforts to analyse labour dynamics and effectively advocate for workers' rights. Addressing this issue may require cooperation between relevant stakeholders to collect comprehensive data on trade union membership in the CPA.

The two main trade union confederations covering the administrative sector are the Trade Union of Administrative Employees ([sas-podkrepa.org](http://sas-podkrepa.org)) and the Federation of Independent Trade Unions of State Government and Organisations ([fnsduo.com](http://fnsduo.com)). Both protect the trade union and labour rights of employees under labour and service relations. As mentioned above, there are some discrepancies between the basic organisation of public administration trade unions and their membership at federal level. This is because the main members of both confederations do not replicate their coverage by economic activity. That is why the structures of the central public administration have trade union membership in the main members of CL PODKREPA, such as Trade Union of Defence - Podkrepa; Culture Federation; Federation of Construction, Industry and Water Supply; National Federation of Trade, Services, Customs and Tourism (TUKOT Podkrepa), Federation of Agriculture and Forestry and Trade Union of Administrative Employees. And CITUB has trade union organisations represented by the National Trade Union of Firefighters and Rescuers "Ogneborets" (NSPS "Ogneborets"), the Trade Union of "Road Work", the Federation of Independent Trade Unions of Agriculture and the Federation of Independent Trade Unions of State Government and Organisations - FNSDUO. It is very possible that other federations are also members of the CPA.

#### 4. Major problems and challenges in the sector

According to the Council of Ministers' report on the state of public administration for 2022, the main challenges and requirements in the sector are related to the **modernisation of the Central Public Administration (CPA), especially in terms of improving efficiency, transparency and digitalisation of administrative processes.**

In the context of digital transformation, the use of up-to-date information and communication technology (ICT) solutions is essential to improve the delivery of services to citizens and businesses. The development of digital transformation processes within the CPA requires the adoption of modern ICT solutions to streamline administrative activities and improve service delivery.

Legislation such as the E-Government Act (EGA) plays a crucial role in promoting digitisation within the CPA. The EGU requires administrative authorities to provide electronic administrative services and encourages the one-time collection of data for repeated use. This requirement aims to reduce administrative burdens by eliminating the need for citizens to repeatedly submit the same documents and information to different authorities.

By implementing the provisions of the EGU and using ICT solutions, administrations can improve the efficiency, transparency and accessibility of services. This not only improves the overall user experience for citizens and businesses, but also contributes to the modernisation and optimisation of administrative processes within the CPA.

The Ministry of Electronic Governance (MEU) plays a key role in developing and maintaining the administrative framework necessary for the effective use of shared resources by the administrative authorities in Bulgaria. A key aspect of this framework is the establishment of a networked administration in accordance with the eGovernment Architecture.

A key resource provided by this framework is the horizontal and centralised eGovernment infrastructure. This infrastructure facilitates the exchange of documents between administrative authorities, streamlines communication and increases efficiency within the public sector.

By the end of 2022, significant progress had been made in the adoption of electronic messaging systems by administrations. Out of 585 administrations, only 8 did not exchange documents with other

administrations via the electronic messaging system. This indicates a widespread adoption of digital communication tools across the public sector.

However, the migration of existing information systems, registers and e-services to the State Hybrid Private Cloud remains a work in progress. Despite the benefits of a centralised cloud infrastructure, only 13.50% of administrations had planned to migrate by the end of 2022. This suggests that further efforts are needed to encourage administrations to use cloud technology to improve data management, security and efficiency.

Overall, the efforts led by the Ministry of Electronic Governance demonstrate a commitment to modernising administrative processes and improving the digital infrastructure within the Bulgarian public sector. Continued investment and collaboration will be essential to further advance e-government initiatives and realise the full benefits of digital transformation.

The main conclusion to be drawn from this situation is that many administrations face challenges due to **insufficient financial resources to fulfil their spatial data management and publication obligations.**

Administrations are required to provide access to the spatial data they create and maintain, to describe them with metadata, and to create network services for these data. They are also expected to harmonise and format the data appropriately for publication on the National Spatial Data Portal.

However, **the lack of adequate financial resources hampers the administrations' ability to fulfil these obligations effectively.** Insufficient funding may limit their ability to invest in the necessary infrastructure, technology and expertise required to manage spatial data and develop network services.

As a result, administrations may struggle to ensure the timely and accurate publication of spatial data on the National Spatial Data Portal, which could hamper efforts to promote transparency, accessibility and interoperability of spatial information across sectors.

To address this issue, policy makers may need to allocate additional financial resources to support administrations in meeting their spatial data management obligations. This could include increased funding for infrastructure development, capacity building and technical assistance initiatives aimed at improving spatial data management and promoting the effective use of spatial information for decision-making and development.

**In general, activities related to spatial data and the fulfilment of obligations have a low priority and are underfunded. Working with spatial data requires specific skills and highly specialised professional training, which are not available in most administrations and require additional training for administrative capacity building.** More than 480 of the administrations regularly analyse and plan **the training needs of their staff in order to improve their skills in the field of administrative services.** Only 41 of the administrations stated that they did not plan any training, indicating that the reason for this was a lack of financial resources.

**The policy of quality management in the state administration is set as one of the main priorities** for the development of the state administration. It is aimed at the implementation of quality management systems for the continuous improvement of the activities of administrations, which is a European model for improving the activities of the administration. In 2022, 32% of administrations use quality management systems, including the most widely used ISO - 201 and CAF -79. Quality policy could become an important part of the social dialogue agenda of the Tripartite Cooperation Councils.

Based on the analysis in this section, I would like to stress that in the CPA the most important issues in the sector are the following

1. Improving the electronic infrastructure.
2. Improving the electronic literacy of the workforce.
3. Improving the wages in the sector.
4. Improving the legal framework to extend the possibilities for social dialogue and CLA.
5. Improving the measures to introduce quality management systems.

From the perspective of social dialogue challenges, there are also several issues.

Trade union representation in the Central Public Administration (CPA) in Bulgaria is characterised by fragmentation, with various trade union organisations active in the sector. These trade union organisations are typically members of different confederations affiliated to the national trade



unions CL Podkrepa ODKREPA and CITUB. This leads to challenges in coordinating collective bargaining efforts and representing the interests of workers in the sector.

In addition, there may be third trade union organisations that are not nationally represented but still participate in the collective bargaining process by supporting the agreements reached by the main confederations. These organisations can play a role in influencing negotiations and ensuring that the interests of their members are taken into account.

Overall, the fragmentation of union representation within the CPA underlines the diversity of perspectives and interests among workers in the sector. While this diversity can enrich discussions and negotiations, it can also pose challenges in achieving consensus and effectively representing the interests of all workers. Cooperation and coordination between trade union organisations will be essential to meet these challenges and to promote the collective interests of workers in the Central Public Administration in Bulgaria.

The second major challenge is uneven representation - while there are trade union sectors in some administrative bodies, there are no unions at all in others. The two main confederations in the CPA are the SAS and the FNSDUO. They are represented with members in both the central and territorial structures, such as the Employment Agency (AE), the Social Assistance Agency (ASA), the National Insurance Institute (NII), the National Health Insurance Fund (NHIF), the General Labour Inspectorate (AMIL), the Registration Agency (RA), the State Archives (SA), prisons, the Ministry of the Interior (MVR), the State Reserve and War Stocks, Landscape and Communal Economy (BKS), municipal administrations and others.

The total number of trade union members is unclear. It is difficult to define the exact membership density in the CPA because of the lack of information that should be provided by the different confederations. SAS PODKREPA has around 7,000 members, but there is no integrated data on other confederations. For example, there are 9000 employed in the National Tax Agency and 10%, about 900, are members of TUKOT. There are 3000 employees in the Customs Agency and about 120 of them are members of TUKOT, but there are also two other trade union organisations of CITUB (FNSDUO) and one independent trade union, so the exact membership data is not available. There are regions (SRS Gabrovo Podkrepa) which declared that 10% of their regional members are in CPA (out of 1000 members in





Gabrovo region, 100 are in different territorial structures of Employment Agency, Social Welfare Agency, National Insurance Institute, NHIF, RA). At regional level, there is no representation as part of CPA except in the National Insurance Institute and the Regional Administration (Oblastna administracia).

It's interesting to note that few of the respondents share the view that, despite differences in membership related to territorial structures, the total membership of the various trade union organisations in the Central Public Administration (CPA) sector in Bulgaria is claimed to be almost equal in the two main trade unions.

**The main challenges identified by respondents are related to financial constraints, the "incompleteness" of the legislation, the personal attitude of employers towards trade unions, the lack of qualified young workers and the age profile of workers in the CPA.**

*"The main challenge is the budget, because the wage fund is fixed in the state budget", so the restrictions concern all the structures of the central administration because of the annual limits of the payment of labour. "An imperative norm determines the ceiling".*

The legislative challenges concern the **lack of a clear procedure for collective bargaining**. The law stipulates that the employer is obliged to enter into negotiations with the trade union, but the law does not define a time limit for accepting or rejecting an agreement to be signed, thus hindering the possibility of the right to protest or collective labour disputes. This lack of conditions is used by unfriendly employers to postpone negotiations, and this has an impact on membership motivation and refusal to join.

Another legal issue concerns the **different status of employees in the CPA**. Civil servants and contract workers have different legal rights because, as mentioned above, the Civil Servants Act regulates through mandatory norms and the Labour Code through discretionary norms. In some municipalities and agencies, for example, there are differences between those who are employed on a contract basis on budget financed matters and those who are employed on a contract basis financed from the municipal budget (or on projects) - the so-called "out of state" employment. This difference is "reflected" in their rights to collective agreements and strikes, and in the ability to negotiate the level of paid days off, pension benefits and other social issues for both categories. That is why these categories are called differently - servants and workers. Collective agreement is applicable for



workers on the Labour Code and for civil servants is applicable so-called agreement (sporazumenie), but as we noticed both do not have the same arrangements of labour issues.

*" It is difficult to negotiate a collective agreement when there are three different ways of financing the material."*

Since the changes in the legislation in 2012, the right to "class time served" (bonus for length of service) - which has a permanent character - was abolished and integrated like "additional rewards for achieved results" - which has a volatile character for the employer four times a year (the Labour Code regulated this issue in Article 107(14) p.5). This leads to unfairness against the so-called "out-of-state" employees who use the right of class time served and receive higher salaries than the other two categories. On the other hand, civil servants have no deductions from their salaries for insurance and pay only 10% income tax. This is how the basic legislation differentiates the labour issues.

The employer's **attitude towards social dialogue and cooperation** with trade unions is another challenge in the sector that reflects the working conditions. All the respondents agreed that good communication and regular meetings between the trade unions and the management are key to good cooperation and a good working microclimate, because the aim of the social dialogue mechanism - called Social Council for Cooperation or Permanent Working Group - is to inform the management about the existing problems in the working process.

The state budget, by its very nature, is a factor that affects the workforce and is one of the main causes of fluctuation. The lack of labour force at the territorial level is also a challenge because some of the main regions in Bulgaria are seriously depopulated and this has a serious impact on the labour market.

## **5. Characteristics of social dialogue organisations in the sector**

**The representativeness criteria for the national representation of trade unions and employers' organisations** are defined in the Labour Code and in the "Regulation on the procedure for establishing the criteria for the representativeness of workers and employers". The procedure is carried out





once every four years by the Council of Ministers. **There are two national trade union confederations and five employers' organisations in Bulgaria.** There is no membership of employers' organisations in the CPA sector because the state is the employer and it's the largest employer in Bulgaria.

**The size and structural characteristics of the membership of the main trade unions in the CPA** sector are shown in Table 1, which describes the distribution of trade union membership across the different confederations. The fragmentation of membership does not allow for accurate data on membership density in the CPA. The main trade unions SAS PODKREPA and FN\$DUO have structures in the Agency for Social Assistance, the National Health Insurance Fund, the National Insurance Institute, the Registry Agency, the National Statistical Institute, the Employment Agency, the Executive Agency of the Main Labour Inspectorate, the Ministry of Justice, the Ministry of Culture, the municipality of the capital city (Sofia) and others.

On one side of the social dialogue are the two national trade unions and on the other side of the employers are all the structures of the CPA with their management. In general, negotiations in the CPA take place between the union president and the director of the agency, or between the president of the regional union and the mayor of the municipality. There is one exception in the CPA: in the National Statistical Institute, the social dialogue and collective agreements involve, on the one hand, the union president and all the leaders of the base trade union organisation in six territorial structures and, on the other hand, the president of the Institute and the six managers of the six territorial statistical bureaus (offices). This multilateral meeting, with seven representatives from one side and seven from the other, is unpopular, but it is based on very well-functioning communication between the trade union members and the trade union leaders of these offices, then between the fixed trade union leaders and the president of the SAS, and on very constructive and permanent social dialogue meetings every three months. The union representatives attribute this good practice to the very good leadership of both the main union and the president of the institute. In this case, the principle of "intuit personae" confirms that the quality of the social dialogue depends on the personal industrial relations culture of both sides.

**The representativeness criteria in national law are the same for civil servants and contract workers** and are based on the constitutional right of association. The right of employees to join trade unions and the right of



employers to join employers' organisations are regulated by the Constitution of the Republic of Bulgaria, the Labour Code and the Civil Servants Act.

The association of civil servants is regulated by Article 43 of the Civil Servants Act: "Civil servants shall have the right to associate in professional organisations and non-profit organisations. "

Trade unions of civil servants are regulated by Article 44 of the CSA: (1) Civil servants have the right to freely form trade unions, to join them and to terminate their membership, taking into account only their statutes. (2) Trade unions of civil servants have the right to determine their statutes.

The Labour Code regulates the right of association in Article 4 and the right to collective bargaining in Article 50 to Article 60.

For civil servants, cooperation (CA) with trade unions is regulated in Article 46a. ((1) The structure, scope and forms of cooperation shall be determined by agreement between the trade union organisations of civil servants and the Council of Ministers; (2) the procedure for concluding the agreement and the criteria for trade union organisations shall be determined by ordinance of the Council of Ministers; (3) all draft normative acts relating to service relations shall be coordinated with the trade union organisations.

**Barriers to the process of social dialogue include legal restrictions on the right to collective bargaining for civil servants. Another obstacle is the frequent changes in the management of the agencies - because this reflects the personal attitude of the employers to the process of developing industrial relations in a particular sector, as well as the frequency of social dialogue meetings in the Councils for Social Cooperation. The strength and long-term existence of trade union organisation is fundamental for the process of social dialogue.**

### **5.1. Challenges for organising employees**

The main organising challenge relates to **understanding the purpose of trade unions and the added value of social dialogue** among employees in the CPA. The challenges are two-sided. On the one hand, trade unions need to be more visible, talk more and promote their activities; on the other hand, employers need to accept trade unions as a partner that could support the efficiency of the administration and the motivation of employees. The political



changes reflect the management of the CPA and have a direct impact on the dialogue with the social partners.

According to several union representatives who were interviewed, the activity and personality of union leaders play a crucial role in building trust among those employed in the sector. For example, the increasing interest in membership of the CPA due to the contribution of the president of the national trade union - the organisation of protests at national level and the intensity of communication with workers. These activities increased interest in the territorial structures of different administrations and in organising new sections.

Another challenge is the approach of employers to trade union activities. Few of the interviewees shared the view that the changes in the management bodies of the employers were also reflected in the issues of social dialogue.

## 5.2. Good practices for organising employees

**All the respondents pointed to the benefits in the CLA as good practices for organising workers, such as prizes, cash bonuses for holidays, extra days off, wage increases, participation in the development of a regulation on minimum wages in individual agencies; "Bringing people together and putting forward the employer's demands and the employer's agreement is the best example of good practice".**

The presence of the CLA provides a certain "protection that you can take your problem to the trade union organisation of which you are a member, it gives people inner peace and reassurance".

Other examples of good practice include information and training campaigns and good practices from other countries; federation meetings where people can exchange information on how they have dealt with certain practices; support from federations to base trade union organisations for the preparation of CLAs; participation in trade union events to be done by the employer and not with days off from the worker's annual leave, which prevents the possibility of receiving additional pay on the basis of days worked; additional pay for results achieved; tickets to sports and cultural events; provision of funds for vision correction and medical examinations for women; additional pay for academic degrees.

**The establishment and smooth functioning of social cooperation councils** is also seen as good practice. Most respondents agree that "they are good for both the employer and our members". **Long-term trade union work,**



with **good leadership** of the organisations and established **structured cooperation councils**, leads to trust in the employer, and the employer itself approaches the trade unions with its demands for remuneration when submitting its own budget to the state budget. In the 2024 budget, we worked in parallel with the trade unions and the directors of a tax agency.

The latest example of **cooperation between national trade unions in protesting for the increase of salaries in CPA** - the Trade Union of Administrative Employees "Podkrepa" and the Federation of Independent Trade Unions of State Administration and Organisations was the protest on 3 April 2024 in front of the Council of Ministers. The protest was for the preservation of the planned amounts of funds / in the draft of the Council of Ministers / to overcome the imbalances in the remuneration of employees in the state administration - CPA.

Other good practices **include informing society about the right of association and as a practice for unionising and developing the collective bargaining process.**

Organising, which is the basis of trade union activity, to promote the benefits of belonging to the trade union community and to recruit members through various campaigns in the specific sector, has not been carried out jointly by the two nationally representative trade unions - CITUB and PODKREPA - in recent years. There is no joint coordination of efforts on the part of the unions, which are the main members of the two confederations representing the sector (Table 1, p.14). The fragmentation of trade union membership can be overcome through better coordination between trade union structures and better defence of the positions and interests of CPA employees in front of employers' representatives. The lack of general positive campaigns to attract new members is not a peculiarity of the sector, but a weakness in the activities of the national unions as a whole. In recent years we have seen the creation of local unions as a result of protests at national level, for example at the registry office. This can be seen as a negative campaign, which also produces results, but it should be used as an exception for unionisation and not as the main method of promotion.

### **5.3. Characteristics of employer representation**

In essence, the state can be seen as the employer, with the Prime Minister as its representative. In practice, however, negotiations often take place with the heads of the various administrative structures. This reflects the decentralised nature of decision-making within the government, where



authority and responsibility are delegated to different levels and branches of the administration. Indeed, the levels within the CPA define the levels of negotiation between the social partners, reflecting the decentralised nature of decision-making. In most cases, the president of the agency is the legitimate representative of the employer. However, there are exceptions, such as the National Statistical Institute, where the employer representation extends to the president and managers of all six territorial offices. This variation highlights the need for flexibility and adaptability in bargaining structures in the public sector.

## 6. Collective bargaining and other forms of social dialogue in the sector - characteristics

In part 3.1. Regulatory framework, we explained the roots of the differences between servants and workers in CPA. The CLAs are positively assessed as a practice in different administrations and work flawlessly where they succeed *"The employer sees that we help him and legitimise his expenses"*. In the National Tax Agency in 2023 there was signed CA for 2 years, which have better conditions for retirement, social assistance for illness and childbirth.

**At national level, around 90-95% of SAS members are covered by collective agreements.** At a territorial level it depends on the unionisation of the regional structures. For example, in SRS Podkrepa Gabrovo there are collective agreements in 50% of the municipalities in the region. In one of the six territorial statistical offices, about 60% of the employees are members of trade unions, so the coverage of collective agreements is high. In the two revenue agencies - National Revenue Tax Agency (NRA) and Customs Agency - there is 10% membership (900 out of about 9000 employees) and 120 members out of 3009 in the Customs Agency. The FNSDYO also has about 10% in the NRTA and so is the CA coverage for both federations. In the Employment Agency the established state of employment in the whole agency is 2200 people, 400 of the places are vacant and the membership is about 300 members. Some of the benefits in this agency's CLA are a higher pension, two extra days for children's birthdays, the right to representative clothing, food vouchers and spectacles.

Civil servants in Bulgaria have the **right to strike**. This became possible after the government approved amendments to the Civil Servants Act. The amendments aim to synchronise our legislation with European legislation<sup>1</sup>. Now civil servants can call a strike, but the implementation of the strike will be



carried out by wearing appropriate signs and symbols, protest posters, tapes, etc., without interrupting the performance of the civil service. This is an important step to protect their labour rights.

Protests have been held after working hours (for example, in the National Tax Agency in 2017, due to the creation of a new department - fiscal control - increasing uncertainties related to restructuring and fear of dismissals.

Restructuring was not well represented and people were afraid of structural reforms because of layoffs).

### 6.1. Content analysis of collective agreements

The National Institute for Consultation and Arbitration (NICA) is the institution in Bulgaria responsible for the annual analysis of collective bargaining. The data are presented on the basis of the total number of concluded or registered in the integrated information system of the NIPA, TCDs and their annexes. The data in the tables and figures are current as of 21.03.2023.

AGREEMENTS CONCLUDED AND THEIR ANNEXES BY YEAR. As of 31.12.2022, the National Institute for Consultation and Arbitration (NICA) has data on a total of 17,225 collective agreements and their annexes, of which 13,677 are collective agreements and 3,548 are annexes.

Several government agencies have CLAs - NRA (29.10.2021), National Statistical Institute, The Employment Agency, Social Assistance Agency (19.12.2023), Registry Agency, etc. These are some of the major collective agreements. Despite some differences, these CLAs contain many similar clauses. The common articles in most collective agreements are related to Additional remuneration (art. 31 of Social Assistance Agency CA, art.22 in Registry Agency CA etc.)

- The Parties to this CA shall make **joint efforts to increase the efficiency of work and the quality of administrative activity and administrative services** in order to increase the public rating of the CPA and all its departments, as well as to ensure the employment of employees and their career development in accordance with the law.

- In order to ensure objectivity and fairness, the parties **undertake to work together to establish an effective mechanism for transparency and control of the individual evaluation process**, on the basis of which the specific individual amounts of additional performance remuneration are determined.





- Collective agreements include contracts with **health care institutions for the performance of periodic medical examinations of employees** in accordance with the Ministry of Health Decree on obligatory preliminary and periodic examinations.
- The employer undertakes to provide, at his own expense, **means for correcting the eyesight of employees working with video displays, if prescribed by an ophthalmologist.**
- The employer is obliged to purchase and provide appropriate **office furniture and disinfection of workplaces**, if financial resources are available.
- The most common items are **additional annual holidays, increased retirement benefits, trade union leave, free work and uniform clothing.**

As a good example, the compensation negotiated in the collective agreement in the Agency of Social Assistance - in case of dismissal due to closure of the enterprise or part of it, redundancy in the state, reduction of the volume of work, in case of refusal of the worker or employee to follow the enterprise or its department in which he works, when he moves to another locality, or when the position occupied by the employee must be dismissed for the reinstatement of an unlawfully dismissed employee who previously occupied the same position, the employee is entitled to compensation from the employer. The compensation is equal to his gross salary for the period of unemployment, but not more than 2 months (Art. 222(1) of the Labour Code 1 month).

An employee is entitled to compensation from the employer in the amount of his gross salary for a period of 4 months if he has worked at the place of employment for 5 to 10 years, and for 5 months if he has worked at the place of employment for more than 20 years (2 months under the Labour Code).

Upon termination of the employment relationship, according to the Labour Code, after the worker or employee has **acquired the right to a retirement pension**, regardless of the reason for the termination. He is entitled to compensation from the employer in the amount of his gross salary for a period of 2 months, and if he has acquired 10 years of service with the same employer or in the same group of enterprises during the last 20 years - to compensation in the amount of his gross salary for a period of 6 months. In the collective agreement these compensations are exceeded - 3 months (gross salary) for up to 5 years of service, 6 gross salaries for 5 to 10 years of service



and 10 monthly gross salaries for more than 10 years of service with this employer. The only limiting condition for receiving this additional compensation is that the trade union membership should not be less than 2 years.

## 6.2. Other forms of social dialogue

There are no other forms of social dialogue relevant to the sector in the CPA. Two of the union leaders interviewed said that in the past, in the early 2000s, a memorandum was signed between the unions and the then Minister of State Administration, Dimitar Kalchev, to resolve all non-regulated issues: *"You make a memorandum when you don't have a functioning trade union. It is used by the president of a confederation to sign with a minister when agreements cannot be reached at lower levels."*

In the structures of the CPA where there are no trade union organisations, such as the 28 regional administrations (*oblasti*), where there is only one CITUB structure in Veliko Tarnovo and no signed collective agreement, workers negotiate wage increases through another form of workers' representation - the so-called **General Assembly of Employees**. At the beginning of April 2024, the workers of the Regional Administration in Sofia expressed their dissatisfaction with the low increase in basic monthly salaries adopted by the government and insisted that their salaries should correspond to the average salary for the capital, which, according to the NSI, is 2,999 BG leva.

In accordance with the decisions of the general assembly of the workers held on 4 April, and on the basis of the law on the settlement of collective disputes, their demands were sent on 5 April to the regional government of the Sofia region and to the Council of Ministers.

## 6.3. Impact of European sectoral social dialogue

The impact of the European social dialogue is currently rather limited and focuses on the definition of the components that determine national minimum wages in accordance with the Directive 2022/ 2041 -19.10.2022 on adequate minimum wages.

Employers' organisations emphasise labour productivity as a crucial factor, while trade unions emphasise the cost of living as the most important consideration. This reflects different perspectives on how to set fair and sustainable minimum wage levels, with employers focusing on economic





productivity and trade unions prioritising workers' ability to meet basic living costs.

Most respondents agree that there is a need for joint information campaigns by unions and employers on collective bargaining, as well as the introduction of some privileges for employers who conclude collective agreements.

## 7. Conclusions and recommendations

In conclusion, this report has identified several factors that contribute to the limitations of social dialogue and collective bargaining within the Central Public Administration (CPA). These include budget constraints, legal constraints, employer attitudes, trade union activity and leadership, and the diverse structure of employment within the CPA.

However, it has been shown that effective communication within trade union structures and regular meetings in social dialogue councils are essential methods of improving both the quality of work and worker satisfaction. By promoting open dialogue and cooperation between stakeholders, the social partners in the CPA can work to overcome these constraints and improve overall organisational effectiveness and employee well-being.

It is also clear from the interviews that a functioning social dialogue can be achieved either through long-established cooperation between trade unions and employers, implemented in a formalised cooperation council with its own rules and procedures, or in the newly created trade union structures, through increased trade union activity, leadership presence and a continuous process of communication among the members themselves and between them and the employers' representatives. Both cases confirm that social dialogue improves working conditions and the quality of public services.

The main obstacle to wage increases in the CPA remains budgetary constraints, and this is where unions and employers are coordinating their demands to address the government. In 2023 trade union structures held meetings with parliamentary groups before the vote on the state budget. The funding of administrative structures depends on wages and the ability to train and improve the skills of civil servants.

Good dialogue is a prerequisite for better pay and working conditions. A representative participant says: "*We were in one of the last places out of 121 structures in the CPA, we were 114th, and thanks to the **developed trade***



**union organisations and several protests we were able to negotiate adequate salaries** through a separate decree of the Council of Ministers, almost 30% of funds were allocated for raising wages. **Thanks to the negotiations, we have won more decent salaries up to the average salary in the country. And we will continue to fight together".**

## Recommendations

- **Develop trade union campaigns in areas with lower density:** This involves targeting regions or departments within the central administration where union membership is weaker. The aim would be to raise awareness of the benefits of trade unions, encourage membership and defend the rights and interests of workers in these areas.
- **Improve the exchange of information on good practice:** Sharing successful strategies and tactics between different confederations within the central administration can be hugely beneficial. This could include methods of increasing membership, negotiating better working conditions or addressing common challenges faced by workers.
- **Build leadership skills:** Investing in training programmes and resources to develop the leadership skills of union representatives is crucial. Effective leaders can mobilise members, negotiate effectively with management and bring about positive change within the organisation.
- **Unite union structures:** Cooperation and alignment of demands between different federations and regions, even within different confederations, can strengthen the collective voice of workers. By presenting a united front, unions can have greater influence and negotiate more effectively with employers or government bodies.
- **Co-operation between the national unions represented in the central administration and EPSU** to share best practice and better co-ordinate their common demands for better working conditions for CPA workers.

Each of these strategies plays a vital role in strengthening the overall effectiveness and impact of trade unions within the central administration. By focusing on areas of lower density, sharing best practice, developing



leadership and fostering unity, unions can better defend the rights and interests of workers at different levels and in different regions.

Last but not least, in the context of the implementation of the Adequate Minimum Wages Directive - the issue of measurability - instruments for adequate measurement and the choice of indicators to be monitored will be on the social partners' agenda and will become a key issue not only at national level but also, for purposes of comparison and correspondence, a key issue in the European social dialogue.

- **Defining adequacy:** Social partners will need to agree on what constitutes an adequate minimum wage. This may involve taking into account factors such as the cost of living, purchasing power and prevailing wage levels in different sectors and regions.
- **Choice of indicators:** Choosing the right indicators is essential to accurately measure the adequacy of minimum wages. Indicators could include the ratio of the minimum wage to median or average wages, the minimum wage compared to poverty thresholds, and the share of workers earning the minimum wage.
- **Measuring impact:** It's important to monitor the impact of minimum wage policies over time. This could include tracking changes in income inequality, poverty rates, and overall living standards for workers earning the minimum wage.
- **Comparative analysis:** Given the transnational nature of the Directive, harmonisation of measurement methods and indicators across European countries will be crucial to facilitate meaningful comparisons and ensure consistency in reporting.
- **Data collection and reporting:** The establishment of reliable data collection mechanisms and reporting frameworks will be necessary to ensure that social partners have access to accurate and up-to-date information for monitoring and evaluation purposes.
- **Social dialogue:** Constructive social dialogue between employers, trade unions and relevant stakeholders will be essential to reach consensus on measurement methodologies and to ensure the effective implementation of minimum wage policies.



By addressing these issues and working together through social dialogue, social partners can ensure that minimum wage policies are effectively monitored, evaluated and adjusted as necessary to promote fair and adequate wages for all workers.

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