

Update on the context and situation of children

The Government continues to demonstrate its commitment to improving the situation of children and adolescents in Georgia through the adoption of a range of progressive legislative and policy initiatives in the areas of justice for children, child care, early and preschool education, inclusive education, referral systems for child protection, social protection reform, health policy and general child rights. Despite progress achieved, significant challenges remain.

The 2018 MICS6 results demonstrated that nearly half of all newborns were delivered by cesarean section with 80% of cases elective, very few newborns receive skin-to-skin contact and breastfeeding rates are low with only 20% of children between 0-5 months exclusively breastfed. Almost 70% of children continue to suffer from violent methods of upbringing, especially children with functional difficulties, and more than 30% of children experience physical punishment of which 5% were subject to severe punishment. Many children do not receive enough stimulation at home for their early learning and development and less than 10% of fathers are engaged in their children's upbringing. More than half of Georgia's children do not have access to children's books.

- During the first week after discharge from the health facility, 57.2% of newborns have not received a health check. After one month, 17% of newborns still have not received this service, with some regions reporting as much as 46% of newborns not reached.
- The percentage of children aged 6-23 months who receive a minimum acceptable diet (dietary diversity + meal frequency) is only 27.4%.
- Georgia is one of the top 10 countries in the WHO European region for incidence and number of measles cases (4,398 cases registered).
- 8% of children between 2-17 years have functional difficulties in at least one domain including seeing, hearing, walking, fine motor skills, communication, learning, playing, and/or controlling behavior.
- 1.4% of women aged 20-49 were married before the age of 15 and 17.3% before the age of 18.
- Upper secondary school completion rates are strongly related to the wealth of the household. Only 56% of poor children but 96% of rich children complete upper secondary school.
- While school attendance in primary and lower secondary school is almost universal (98% and 96% respectively), 15% of upper secondary school age children do not attend school.
- 22% of children between 3-5 years do not participate in preschool education. Children from poor families (39%) are more often out of preschool education than children from rich families (13%).
- 6% of households do not have adequate means to wash their hands because of the unavailability of water, soap or detergent. 25% of households have drinking water contaminated by E-coli.
- 41% of children in Georgia have blood lead levels (BLL) above 5 $\mu\text{g}/\text{dL}$, the National Centre for Disease Control reference level (25% of children have BLL between 5 and 10 $\mu\text{g}/\text{dL}$ and 16% 10 $\mu\text{g}/\text{dL}$ or more).

According to the 2018 Programme for International Student Assessment (PISA) survey, 15-year-old children in Georgia scored lower than the OECD average in reading, mathematics and science. Moreover, out of the 79 countries and territories participating, Georgia remained amongst the ten with the lowest scores. PISA 2018 results in Georgia were significantly below those observed in 2015 in reading and science, reversing most of the gains observed between 2010 and 2015. Only mathematics results were significantly above the level observed in 2010.

GeoStat data from 2019 showed that, by the national absolute child poverty measure, 25.5% of children in Georgia live in poverty, while only around 16% of children are covered by the national social protection benefits. There are rural-urban disparities whereby the percentage of population below the absolute poverty line in urban areas is 18% while in rural areas is 23.1%. No statistical difference was identified for gender. The Welfare Monitoring Survey 2017 confirmed that poverty rates are higher in households with children with 24.1% of households with one or two children live in general poverty compared to 16.6% of households without children. These figures rise with the increase in the number of children in the household.

The number of children in state institutions remained relatively low at 81 children in 2018. At the same time, the Public

Georgia

Defenders Office (PDO) reports identified serious concerns regarding the quality of care in all types of alternative care, including incidents of sexual violence.

Also during 2019, the Committee on the Rights of the Child issued its concluding observations on the report submitted by Georgia under Article 8 (1) of the Optional Protocol on the involvement of children in armed conflict. The Committee raised concerns about reported cases of recruitment and radicalization of children in the Pankisi Gorge, as well as about the possibility of persons below the age of 18 years attending a higher military educational institution. The Committee was concerned that military service permitted for students below the age of 18 years might involve the handling of firearms. The Committee also noted that despite the prohibition of recruitment of children below the age of 18 years into the armed forces, the Criminal Code does not explicitly criminalize such recruitment, or the use by the armed forces of children below the age of 18 years in hostilities.

The implementation environment during 2019 was challenging and characterized by political tensions on justice and electoral reforms, and relations with Russia, as well as by continued concerns about the situation in the non-government-controlled regions of Abkhazia and South Ossetia. The challenges included the resignation of the Speaker of Parliament and the Prime Minister, the restructuring of government bodies including personnel changes at senior and middle management levels, massive political demonstrations, protests of radical groups against the adoption of the Child Rights Code, limited access to Abkhazia, as well as security incidents at the Administrative Border Line to South Ossetia.

Disaster and emergency risks for children remain as Georgia experiences periodic conflict and/or civil unrest and is prone to flooding, landslides, and earthquakes.

Major contributions and drivers of results

2.1 Cross-sectoral results

Code on the Rights of the Child adopted

The Code on the Rights of the Child was adopted by Parliament on 20 September 2019 after a three-year drafting and consultation process led by the Parliament Committee on Human Rights and Civil Integration in close collaboration with UNICEF and with support from the EU to ensure adherence to international child rights standards. The Code will enter into force on 1 June 2020.

The Code is expected to fundamentally change how Georgian law treats children and issues concerning children. It covers all rights and freedoms of children and introduces child rights protection and implementation mechanisms. The Code is based on the key principle that all relevant legislative and administrative procedures should be developed and implemented with primary consideration given to the best interests of the child. The Code provides legal guarantees to empower children in independently exercising and protecting their rights, inter alia, through child-friendly access to justice institutions and mechanisms. It reinforces safeguards for gender-sensitivity in procedures, including additional protection for girl victims of sexual violence, and introduces a ban on traditional rituals when they represent a risk for the child.

The Code was developed in a fully participatory process with technical and advocacy support provided by UNICEF. Youth and children from various socio-economic backgrounds throughout Georgia were invited to comment and advise on the Code. Intensive communication and advocacy efforts conducted by UNICEF around the Child Rights Code contributed to mitigating risks and winning the support of civil society and religious leaders.

MICS 6 results finalized and launched

The results of the 2018 Multiple Indicator Cluster Survey (MICS6) were finalized and launched. The MICS6 provided representative data for all regions of Georgia under effective control of the Government. The data is also representative of national minority groups and internally displaced persons. The MICS6 provided baseline indicators for the nationalized Sustainable Development Goals, established the prevalence of blood lead levels (BLL) in children (2-7 years), and assessed the quality of drinking water. The MICS6 was carried out by the Georgian National Statistics Office (GeoStat) with the involvement of the National Center for Disease Control and Public Health (NCDC) and the support of the Government Administration. UNICEF provided technical support throughout the process. UNICEF, Sida, USAID, AFD, SDC, WHO, UNFPA, UNDP, the World Bank, the Italian National Health Institute and NCDC financed the MICS6. The finalization of the results involved rigorous data validation, including data interpretation and report compilation workshops in which experts and decision-makers of all relevant government agencies took part.

This was the first time globally a BLL module was included in the MICS. The results were launched in April 2019 and resulted in the initiation of a state program to prevent lead exposure in children. The findings on water quality resulted in

Georgia

refocused efforts of the Ministry of Regional Development and Infrastructure to improve water quality in those regions identified by the MICS6 to have the highest E-coli contamination.

More than 3,240,148 people reached with evidence-based advocacy messages

UNICEF reached more than 3,240,148 people with evidence-based messages through social media. The newly launched website, more than 60 multimedia stories about and from children and young people, almost 2,000 media stories, as well as new partnerships with religious leaders, influencers and opinion makers contributed to winning support for child rights issues. The 30th anniversary of the CRC created additional opportunities to advocate for children's rights and engage more people in public discourse. The celebrations included a series of lectures on child rights in universities, meetings on child rights for religious leaders, public events, school-take overs and Tbilisi's iconic TV tower going blue. UNICEF's National Ambassador in Georgia, Nikoloz Rachveli, and the National Philharmonic Orchestra dedicated their new season's opening concert to commemorate the 30th Anniversary. The Chairman of the Parliament joined the CRC@30 Global Pledge committing to implement the Code on the Rights of the Child.

Furthermore, the Charter of Georgian Journalistic Ethics was capacitated to take over the monitoring of ethical reporting on children. More than 100 young people in five towns of Georgia enhanced their media literacy skills to think critically about information they encounter and to defend themselves from misinformation.

2.2 Every child survives and thrives

A data culture institutionalized in the field of maternal and neonatal care

The UNICEF-supported Birth Registry (BR) has become an essential tool for the Government as it continues to inform and positively influence maternity care practices in Georgia. With UNICEF support, quarterly perinatal reports from the BR became an institutionalized practice in the MCH Committee of the Ministry for Internally Displaced Persons from the Occupied Territories, Labor, Health and Social Affairs (MoIDPOTLHSA), thereby establishing a new mind-set about the use of BR data, increasing the role of the Committee and strengthening evidence-based policy and decision-making on organization and quality of MCH services.

Government embarks on primary health care (PHC) reform including upscaling of the UNICEF-supported child development oriented rural PHC model

UNICEF and Czech Caritas supported two pilot PHC programmes of which the UNICEF programme registered 3,800 children in the electronic child growth and development surveillance system for children 0-6 years. Based on the positive results of these two PHC pilot programmes which demonstrated feasible reform options at a critical moment of health reform discussions, the Government decided to embark on a long awaited rural PHC reform. The reform aims to make PHC child development oriented, focused on preventive care and able to generate sustained service quality improvements. UNICEF Georgia and Czech Caritas will jointly support the PHC reform. The Government provided digital technologies to enforce the PHC Electronic Health Information Management System (e-HIMS). UNICEF supported an evaluation of the e-HIMS development process. The findings highlight the participatory design process and alignment with global recommendations and noted the challenges faced with transitioning from paper- to computer-based systems including technology issues and functionality of the different modules.

Switch to Electronic Immunization Module decreed

The Government decided to fully switch to the UNICEF-supported electronic data collection system in immunization, the Electronic Immunization Module (EIM), effective from May 2020. UNICEF's active advocacy coupled with continued technical support contributed to the removal of the requirement of paper-based immunization forms. The decision demonstrates the reliable quality of data collected by the EIM.

Infant and Young Child Nutrition Coordination Group established

UNICEF supported the establishment of the Infant and Young Child Nutrition Coordination Group under the MCH Committee of the MoIDPOTLHSA with the aim to enforce the new guidelines on protecting, promoting and supporting breastfeeding, along with promoting and overseeing developments in the field of nutrition. For the first-time, the Government is focusing on school nutrition and requested UNICEF to initiate a Nutrition Policy Gap Analysis. In parallel, UNICEF supported the establishment of a partnership with Parent Associations to promote school nutrition.

2.3 Every child learns

New institutional model mechanism for coordination and continued municipal capacity building in preschool

Georgia

education initiated

UNICEF continued to support Government and municipalities in improving the quality and accessibility of preschool education. Several coordination meetings and workshops in Tbilisi and the regions were organized with participation of all municipal self-governments, the Ministry of Education, Science, Culture and Sport (MoESCS), preschools and professional organizations. As a result, horizontal and vertical coordination, as well as capacity building on the implementation of the Law on Early and Preschool Education and Care (EPEC) and the national preschool standards were strengthened. UNICEF launched a new partnership with the MoESCS' Zhvania School of Public Administration, which is mandated to train public servants of local governments, for continued support to municipal capacity development in the field of EPEC. As a result, the Zhvania School, is now entitled to extend its work to the preschool field. This innovative model is an important achievement for addressing capacity gaps at the municipal level and weak accountability for implementing legislation and policies in the decentralized preschool education system. This innovative approach could be replicated in other policy fields that require coordination between central and local government and capacity building of municipalities.

Central and local governments developed relevant by-laws for implementing the EPEC Law

With UNICEF support, 7 municipalities successfully piloted local strategies to introduce continuous professional development systems for preschool staff. In five of these municipalities, the strategies were eventually adopted. The strategies employ a continued, cyclical approach towards professional development, integrating the identification of training needs, training, coaching, and supervision. As part of the training, teachers were exposed to major principles and methodologies on child-centered and gender-sensitive early and preschool education.

With UNICEF advocacy and technical support, MoESCS also developed a by-law on Inclusive Early Childhood Education integrating principles and mechanisms for cross-sectoral work to support inclusive preschool education. The by-law, planned to be adopted in 2020, defines responsibilities of the MoESCS for setting guidelines and coordination mechanisms with municipalities on improving equitable access and participation in quality preschool education for children with disabilities.

Nine state universities have improved capacity for delivery of pre-service training for preschool educators

UNICEF collaborated with MoESCS, municipalities and state universities to create resources (i.e. educators' guidebooks, training modules) and build capacities for an improved training system for preschool educators and managers. Through several workshops, seminars and coaching sessions, 9 state universities improved their capacity for developing and delivering Bachelor of Arts (BA) level pre-service training programmes for future preschool educators. Six universities prepared the BA programmes for accreditation in 2020 integrating research-based recommendations. UNICEF also supported 7 municipalities and the Autonomous Adjara Region to pilot models for improving competences of preschool educators and sector managers through a comprehensive system of training and preschool-based coaching. Successful and effective practices and lessons learned were documented for their further scale-up.

New School Model initiated based on joint MoESCS-Estonia-UNICEF pilot programme

The MoESCS integrated the child-friendly approaches developed in 20 pilot schools of the trilateral partnership programme with UNICEF and the Government of Estonia into its *New Model School* reform initiative with focus on improving teacher and student performance, delivery and breadth of skills. This partnership supported the development of a teacher training toolkit and the first Georgian digital programme *We learn by Playing*, an innovative supplementary teaching and learning tool with interactive and insightful functionality for children's improved learning. It contributed to improving learning outcomes in the 20 pilot schools and is currently being scaled up by the MoESCS.

Integration of child rights into university curricula initiated

UNICEF established a new partnership with state universities by facilitating capacity development sessions on child rights with university professors. UNICEF supported three universities to adopt child rights into Bachelor programme curricula to better inform and equip future teachers to implement child-focused programming and to address issues concerning the rights of children. This initiative will be scaled up to other universities in 2020.

Evidence-based actionable policy recommendations developed for general education reform

UNICEF and the OECD launched the Reviews of Evaluation and Assessment in Education report for Georgia. The review, which was fully funded by UNICEF, was carried out in close cooperation with the MoESCS during 2018 and 2019. The partnership generated evidence on the effectiveness of the education system, as well as concrete policy recommendations for the new education reform launched by the Government in 2018.

Georgia

Partnership on Ending Violence Against Children (VAC) in Schools launched

UNICEF and the MoESCS launched the new partnership “Ending Violence Against Children in Schools”. This partnership focuses on developing a concept and piloting models of violence-free preschools and schools, institutionalizing mechanisms and strengthen the capacity of school staff to effectively prevent and respond to violence, and integrating issues related to VAC into the national education plan. This initiative resonates with the global *Safe to Learn* initiative of the Global Partnership to End Violence Against Children.

2.4 Every child is protected from violence and exploitation

Political will to end violence against children strengthened

In response to UNICEF advocacy, the Commission on the Rights of the Child under the Government’s Human Rights Council adopted a road map and launched the development of a situational review and a national strategy for the prevention of VAC. This initiative is in line with Georgia’s commitment under the Global Partnership to End VAC and a requirement of the new Code on the Rights of the Child. The road map includes steps to ensure the strategy is evidence-based, costed and developed in a consultative process, including children. The strengthened political will to end VAC also resulted in the development of an interagency concept for an integrated service for child victims of violence which will be modelled in 2020 with support from UNICEF and the Government of Estonia.

New disability assessment and status determination system based on social model successfully piloted

UNICEF supported the Government to pilot a new system to determine disability status based on the social model of disability. Assessment instruments were finalized, the new disability assessment procedure was tested, capacity building for involved professionals was carried out, and the development of a data management application was initiated. The pilot was launched in the Autonomous Adjara Region in partnership with the MoIDPOTLHSA and with financial support from USAID and the EU. UNICEF supported an awareness campaign to create an enabling environment for the social model of disability assessment, and 400 health professionals and community leaders were educated on how to support social inclusion of people with disabilities and to influence social change. Children with disabilities (CWD) and their parents were empowered to demand quality services and about 800,000 people were informed on misconceptions about disability. Service delivery, community engagement and media platforms were used to promote a positive public discourse and narrative on CWD and to address negative attitudes. With support of AFD, the MoIDPLHSA also launched a second pilot to allow comparative analysis of the results. UNICEF supported the Government to ensure quality alternative care for CWD through training and supporting specialized foster care providers and for the staff of two small group homes for CWD. Changes in the national childcare standards were initiated based on the results of these activities.

Social work model expanded to all districts of Abkhazia

In Abkhazia, Georgia, UNICEF supported expansion of the social work pilot to all districts focusing on capacity building of social workers and development of cross-sectoral collaboration on child protection based on the Regional Call to Action to Strengthen the Social Service Workforce, with financial support from SIDA and in partnership with World Vision. A second group of 18 social workers were trained and assumed their duties in the 5 districts that were not covered earlier. Operational and methodological support was provided to all 33 social workers in Abkhazia. Also, a social work course was institutionalized within the curriculum of the Abkhaz State University. UNICEF continued promotion of good parenting practices through study circles with parents and a child health room in the Sukhumi Children’s Polyclinic.

2.5 Every child lives in a safe and clean environment

Lead prevalence among children and water contamination identified

The blood lead level module of the MICS6 established that 41% of children (2-7 years) have alleviated blood lead levels. Individual responses and subsequent recommendations were sent to all 1,578 participants. A special state program was developed in response to the lead results. A study of lead exposure sources is underway.

The MICS6 also identified that 25% of households consume E-coli contaminated water. In response, the Ministry of Regional Development and Infrastructure amended its infrastructural projects to ensure prioritization of the regions with the highest E-coli contamination.

Involvement of adolescents in improvement of WASH conditions in their communities has been initiated with UNICEF’s support. 65 adolescents between 14-17 years in 7 vulnerable rural municipalities increased their knowledge and skills on gender-sensitive WASH as a human right and in planning and implementing successful advocacy campaigns. The trained adolescents initiated 4 advocacy campaigns covering improvement of drainage systems to prevent flooding and

improvement of water quality using petitions and meetings with decision-makers at the municipalities.

2.6 Every child has an equitable chance in life

Fivefold increase of child benefits implemented

In response to UNICEF's 2018 Welfare Monitoring Survey which showed an increase in child poverty rates, the Government increased child cash benefits within the Targeted Social Assistance (TSA) program fivefold starting from 1 January 2019. This resulted in an increase of state budget allocations for child benefits by more than 25 Mio USD. As discussions continued regarding the best modality of delivering child benefits to families, the Government requested UNICEF support to test two modalities: cash transfers or a combination of cash transfers and food vouchers for children. As of November 2019, 146,000 children receive TSA and child benefits, which is around 16% of all children in Georgia.

Three cities committed to join the Child Friendly City Initiative

Three major cities of Georgia, Tbilisi, Batumi and Kutaisi, expressed their interest and willingness to become part of the Child Friendly Cities (CFC) Initiative. The Mayor of Tbilisi signed the global CFC Declaration during the Global CFC summit in Cologne/Germany, while Batumi and Kutaisi participated in the Athens Regional Meeting of Mayors for Children where they committed to making cities work for children and young people. During 2020, actions will be focused on signing memorandums of understanding with interested cities and municipalities in Georgia and developing respective plans of action.

New national youth policy concept drafted

The national youth policy concept, a regulatory framework on the national vision and principles of youth development based on their rights, needs and priorities to support youth participation, education, health and well-being, has been drafted with technical and financial support from the UN Youth Coordination Group including UNICEF. This Group conducted several preparatory activities including monitoring the implementation of the 2014-2020 Youth Policy Action Plan, implementation of a youth dialogue platform and youth on-line consultations, and development of a monitoring framework. Adoption of the concept will be initiated in early 2020 by the Parliament Committee on Sport and Youth Issues. In addition, UNICEF was a key actor in establishing an issue-based coalition to promote mental health of young people. The coalition includes the GOC, Parliament, and civil society organizations.

Lessons Learned and Innovations

3.1 Lessons Learned

Code on the Rights of the Child

The adoption of the Code on the Rights of the Child was the result of an effective partnership between the Parliament Committee on Human Rights and Civil Integration and UNICEF, with political and financial support from the EU. While fully respecting the sovereignty of the Parliament in deciding on Georgian legislation, UNICEF, as guardian of international child rights standards, worked closely with the Parliament to ensure full compliance of the Code with international and European child rights standards. UNICEF also engaged with the EU as Georgia's close partner to get political support. Through constructive and respectful engagement with all relevant stakeholders, the challenges to the draft Code from various actors were overcome.

Key aspects of this successful engagement were:

- UNICEF maintained an influential gatekeeping role and was not compromised by any specific national narrative.
- UNICEF advocated for and ensured a fully consultative process in the development of the Code with all relevant Government agencies, NGOs, religious communities, and Parliamentarians.
- Consultations were held with children from east and west Georgia, which proved to be an important step towards adoption of the Code.
- UNICEF's continuous engagement with all stakeholders, including political support from the EU, facilitated discussions on controversial topics and agreement on articles to include in the Code.
- Conservative groups believed the Code was undermining Georgian traditional family values. UNICEF engaged in an open dialogue with conservative groups and religious institutions to explain the meaning and benefits of the Code. This resulted in the full endorsement of the Code by the Patriarch of the GOC. Consultations were also held with the Muslim community, and a partnership established with the State Agency for Religious Issues, under the Prime

Georgia

Minister's Office.

- UNICEF supported the Parliament in launching a communication campaign on the Code and developing key messages for the public.

3.2 Innovations

Engagement with religious leaders

Opposition faced from some Parliamentarians, political conservative groups and the Georgian Orthodox Church (GOC) during development of the Code on the Rights of the Child, highlighted the need for UNICEF to engage in an open and mutually respectful dialogue with all parties, including the GOC and other religious communities to raise awareness on child rights, including access to health services such as immunizations, and respond to widespread stereotypes and misunderstandings about alleged contradictions between child rights, the rights of parents, and traditional family values. In response to these challenges, UNICEF undertook efforts to build a new innovative value-based partnership with religious leaders and communities and remained open and transparent in engagements with all concerned parties.

However, as the GoC is the most trusted institution in Georgia, these new efforts of UNICEF go beyond awareness raising and diffusion of stereotypes and misunderstandings, as they aim at mobilizing the enormous potential of religious leaders to become actors of social change promoting child rights practices in their communities. Several workshops with priests, imams and representatives of Churches were organized covering all topics of interest related to the situation of children in Georgia, international child rights documents and standards, the benefits from the adoption of the Code on the Rights of the Child, as well as UNICEF's work in Georgia and its position on major issues faced by children in Georgia. This new engagement eventually ensured the open support of the GOC for the adoption of the Code on the Rights of the Child. In August 2019, UNICEF signed a Memorandum of Understanding with the State Agency on Religious Issues, which will allow expansion of the emerging partnership to all religious denominations in the country and the development of specific joint guidance documents on child rights.

The process and lessons learnt are being documented and a short video will high-light key steps in the process.

Study of Lead Exposure Sources

Following up on the MICS results on blood lead levels in children, a study of sources and pathways of lead exposure was designed during 2019. Based on cross-sectoral analyses of lead and other MICS indicators, GIS mapping, as well as stable isotopic ratio analyses of lead particles found in venous blood samples of lead exposed children, hypotheses on potential sources of lead contamination will be formed. Homes, kindergartens, playgrounds and other areas where children with high lead levels spend time will be investigated for lead contamination. Investigation of testing sites will start by screening walls, toys and other objects using XRF analyzers. Specimen of food, water, etc. will be collected and analyzed using atomic absorption spectrometers (AAS). Once results of XRF and AAS testing are available, they will be entered in an Integrated Exposure Uptake Biokinetic (IEUBK) software to compare modeled lead prevalence among children with lead prevalence found during MICS.

To establish a control group, children with high lead levels will be matched in a quasi-experimental manner to children with lead levels under 5mcg/dL. The same lead contamination investigation procedure and technique will be used in households, kindergartens and other sites where control group children spent their time.

New approach to staff learning and development (L&D)

In 2019, UNICEF introduced a new approach to staff learning and development (L&D). Along with traditional individual and group trainings, two innovative models for L&D were introduced: cooperative learning sessions (CLS) and partnerships with universities (PwU). CLS are facilitated by UNICEF staff members/consultants within their field of expertise. They effectively contribute to learning and development of staff, but also help to deepen cross-sectoral work. PwU envisions mutual knowledge sharing between UNICEF and universities aimed at promotion of child rights in universities and at supporting L&D of UNICEF staff for more efficient delivery of results for children. UNICEF's L&D Plan for 2020 was developed by the L&D Committee in a highly participatory way based on a survey on L&D needs and subsequent discussions with all staff members and long-term consultants.