



## **Evaluation of the first phase (2005 - 2009) of the World Programme for Human Rights Education (WPHRE)**

### **GUIDANCE AND QUESTIONNAIRE FOR GOVERNMENTS**

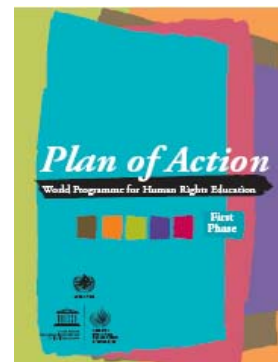
The purpose of this questionnaire is to provide Member States with guidance for the preparation of national evaluation reports on the national implementation of the first phase of the World Programme for Human Rights Education.

#### **I. GUIDANCE**

##### **1. Introduction – The World Programme for Human Rights Education**

The United Nations General Assembly, in resolution 59/113A of 10 December 2004, proclaimed the World Programme for Human Rights Education (2005-ongoing) as a global initiative structured in consecutive phases, in order to advance the implementation of human rights education programmes in all sectors. The first phase of the World Programme covers the period 2005-2009<sup>1</sup> and focuses on integrating human rights education in primary and secondary school systems.

The General Assembly, in resolution 59/113B of 14 July 2005, adopted the revised draft Plan of Action<sup>2</sup> for the first phase of the World Programme, which proposes a concrete strategy and practical ideas for implementing human rights education nationally. Resolution 59/113B, inter alia, encouraged “*all States to develop initiatives within the World Programme and, in particular, to implement, within their capabilities, the Plan of Action*” (para. 2) and appealed to “*relevant organs, bodies or agencies of the United Nations system, as well as all other international and regional intergovernmental and non-governmental organizations, within their respective mandates, to promote and technically assist, when requested, the national implementation of the Plan of Action*” (para. 4).



##### **2. Background to the evaluation**

The evaluation of the first phase of the World Programme for Human Rights Education is mandated both by the General Assembly and by the Human Rights Council as outlined below. The Plan of Action adopted for the first phase of the World Programme by all United Nations Member States through the **General Assembly** provides:

*49. At the conclusion of the first phase (2005-2007) of the World Programme, each country will undertake an evaluation of actions implemented under this plan of action. The evaluation will take into consideration progress made in a number of areas, such as legal frameworks and policies, curricula, teaching and learning processes and tools, revision of*

<sup>1</sup> Although the first phase was initially launched for three years, until 2007, the Human Rights Council subsequently decided, in its resolution 6/24 (28 September 2007) to extend the first phase of the World Programme by two more years until the end of 2009.

<sup>2</sup> A/59/525/Rev.1 hereinafter referred to as “Plan of Action”. For easy reference, the Plan of Action may be accessed at <http://www.ohchr.org/Documents/Publications/PActionEducationen.pdf>

*textbooks, teacher training, improvement of the school environment, etc. The Member States will be called upon to provide their final **national evaluation report** to the United Nations inter-agency coordinating committee.*

...

*51. The inter-agency coordinating committee will prepare a final evaluation report based on national evaluation reports, in cooperation with relevant international, regional and non-governmental organizations. The report will be submitted to the General Assembly at its sixty-third session (2008).*

The **Human Rights Council** in resolution 12/4 of 1 October 2009:

*6. Reminds Member States of the need to prepare and submit their **national evaluation reports** on the first phase of the World Programme to the United Nations Inter-Agency Coordinating Committee on Human Rights Education in the School System by early 2010; and*

*7. Requests the Coordinating Committee to submit a final evaluation report of the implementation of the first phase of the World Programme, based on **national evaluation reports**, in cooperation with relevant international, regional and non-governmental organizations, to the General Assembly at its sixty-fifth session (autumn 2010).*

This evaluation will be carried out by the United Nations Inter-Agency Coordinating Committee on Human Rights Education in the School System (UNIACC), for which the Office of the High Commissioner for Human Rights (OHCHR) provides the secretariat.<sup>3</sup>

### **3. Content of evaluation**

The aforementioned Plan of Action defines human rights education and outlines key actions to be undertaken by ministries of education and other school and civil society actors working in partnership to integrate human rights education effectively in the primary and secondary school systems. The UNIACC evaluation will therefore be based on national reporting on key elements drawn from the Plan of Action, namely the five main components of human rights education in the primary and secondary school systems, in the context of the minimum action which Member States are encouraged to undertake during the first phase of the World Programme.

#### **3.1 Components of human rights education in the primary and secondary school systems**

Human rights education promotes a rights-based approach to education. The Plan of Action provides at paragraph 18:

*Therefore, human rights education in the primary and secondary school systems includes:*

- (a) Policies — developing in a participatory way and adopting coherent educational policies, legislation and strategies that are human rights-based, including curriculum improvement and training policies for teachers and other educational personnel;*

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<sup>3</sup> UNIACC was established in September 2006, as mandated by the Plan of Action, to facilitate coordinated United Nations support to the national integration of human rights education in national school systems. The Inter-Agency Committee, for which OHCHR provides the Secretariat, is composed of 12 UN system entities and affiliated organizations, namely: ILO, OHCHR, UNAIDS, UNDG, UNDP, UNDP, UNDP, UNESCO, UNFPA, UNHCR, UNICEF, UNRWA, and the World Bank. The Council of Europe has participated as an observer.

- (b) *Policy implementation — planning the implementation of the abovementioned educational policies by taking appropriate organizational measures and by facilitating the involvement of all stakeholders;*
- (c) *Learning environment — the school environment itself respects and promotes human rights and fundamental freedoms. It provides the opportunity for all school actors (students, teachers, staff and administrators and parents) to practice human rights through real-life activities. It enables children to express their views freely and to participate in school life;*
- (d) *Teaching and learning — all teaching and learning processes and tools are rights-based (for instance, the content and objectives of the curriculum, participatory and democratic practices and methodologies, appropriate materials including the review and revision of existing textbooks, etc.);*
- (e) *Education and professional development of teachers and other personnel — providing the teaching profession and school leadership, through pre- and in-service training, with the necessary knowledge, understanding, skills and competencies to facilitate the learning and practice of human rights in schools, as well as with appropriate working conditions and status.*

*A detailed description of the five components and related courses of action, to serve as a reference tool, is provided in the appendix.*

### **3.2 Minimum action required by States**

Paragraph 26 of the Plan of Action on “Stages of the implementation strategy” calls for *analysis of the current situation of human rights education in the school system (stage 1); setting priorities and developing a national implementation strategy (stage 2); implementing and monitoring (stage 3); and evaluating (stage 4).*

Paragraph 27 of the Plan of Action provides that *Member States are encouraged to undertake as minimum action during the first phase (2005-2007) of the World Programme the following:*

- (a) *An analysis of the current situation of human rights education in the school system (stage 1);*
- (b) *Setting of priorities and the development of the national implementation strategy (stage 2);*
- (c) *The initial implementation of planned activities.*

## **II. QUESTIONNAIRE FOR GOVERNMENTS**

The questionnaire below to be completed by Governments contains questions that should be addressed in Member States' national reports. Please mark the specific answers with corresponding numbers of the questions. In addition to the questionnaire, supplementary information may also be provided as additional attachments to your report.<sup>4</sup> Governments are strongly encouraged to involve National Human Rights Institutions and civil society in the preparation of their reports. Please return the completed questionnaire and any other additional information to the Methodology, Education and Training Section at the Office of the United Nations High Commissioner for Human Rights (by fax: +41 22 917 9008 or by email: [registry@ohchr.org](mailto:registry@ohchr.org) ; with copy to [wphre@ohchr.org](mailto:wphre@ohchr.org)) no later than 31 March 2010. Submissions by email are preferred, but any materials not available electronically may be posted to OHCHR, attn: METS – WPHRE, Palais des Nations, 8-14 Avenue de la Paix, CH-1211 Geneva 10, Switzerland. Replies received by the deadline will be reflected in the evaluation report to be submitted to the UN General Assembly 65<sup>th</sup> session and may also be uploaded on OHCHR's website for the World Programme.

### **Part 1: BASIC INFORMATION**

- |   |   |
|---|---|
| 1. Date:  | 26 <sup>th</sup> March 2010   |
| 2. Institution responsible for completing this questionnaire: | Directorate for Quality and Standards in Education  |
| 3. Responsible department:                                    | Curriculum Management & eLearning   |
| 4. Contact person:  | Raymond J. Camilleri  |
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| 7. Fax number:  |   |
| 8. E-mail address:  | <a href="mailto:raymond.j.camilleri@gov.mt">raymond.j.camilleri@gov.mt</a>  |
| 9. Webpage:   | <a href="http://www.curriculum.gov.mt">www.curriculum.gov.mt</a>  |

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<sup>4</sup> This may include but is not limited to relevant information reported to the United Nations Human Rights Treaty Bodies contained in Common Core Documents and Treaty-specific reports, as well as relevant responses to UNESCO (e.g. Forth Consultation on the Implementation of the 1974 Recommendation concerning Education for International Understanding, Cooperation and Peace and Education relating to Human Rights and Fundamental Freedoms), Council of Europe (EDC/HRE programme "Learning and Living Democracy for All" 2006-2009), and other consultations.



## Part 2: COMPONENTS OF HUMAN RIGHTS EDUCATION IN SCHOOLS

### A. Educational policies<sup>5</sup> and policy implementation

10. Do education laws, education policies and education policy objectives exist which explicitly refer to the following?<sup>6</sup>

	<i>Yes</i>	<i>No</i>
▪ Human rights	<input checked="" type="checkbox"/>	<input type="checkbox"/>
▪ The right to education	<input checked="" type="checkbox"/>	<input type="checkbox"/>
▪ A rights-based approach to education	<input checked="" type="checkbox"/>	<input type="checkbox"/>
▪ Human rights education	<input type="checkbox"/>	<input checked="" type="checkbox"/>

You may elaborate further if you wish:

This is particularly emphasised through subjects such as Social Studies, Personal and Social Development (PSD), Geography and European Studies

11. Is human rights education incorporated in national plans and strategies including those listed below where they exist?<sup>7</sup>

	<i>Yes</i>	<i>No</i>	<i>Doesn't exist</i>
▪ National human rights plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
▪ National plans of action against racism, racial discrimination, xenophobia and related intolerance	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
▪ National poverty reduction strategies and other development plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
▪ National sectoral plans for primary and secondary education	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
▪ National plans for Education for All (EFA)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
▪ National policy frameworks as part of the Decade on Education for Sustainable Development (2005-2014)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If yes to any of the above, please elaborate.

Most of the above are found in the Education Act and the National Curriculum Strategy (1999) which emphasises that all children have the right to education, despite their race, religion, political opinion and gender; also in syllabi of certain subjects and co-curriculum projects with NGOs.

12. Has a national implementation strategy been developed to implement any human rights education policy objective?<sup>8</sup>

There is planned a National Seminar on Development Education in collaboration with DEEEP and the North South Centre to advocate this matter.

<sup>5</sup> Education policies according to the Plan of Action include legislation, plans of action, curricula and training policies.

<sup>6</sup> Plan of Action, appendix A.2-5.

<sup>7</sup> Plan of Action, appendix A.5(d).

<sup>8</sup> Plan of Action, appendix B.10.

If yes, have young people/learners been involved in both developing the national implementation strategy and in its implementation?

The plan is to involve young people and students

Has the strategy been published and disseminated? If yes, please share a copy or refer to a website address if available online.

No

13. Is human rights education present in the national curriculum and educational standards?<sup>9</sup> If yes, please explain its status (e.g. obligatory or optional, subject-based or cross-curricular?).

Yes it is carried out on an obligatory manner for Human Rights Education (HRE) is subject-based in regard to particular subjects. However it is also carried as an optional theme on a cross-curricular level

14. Please state whether guidelines exist for writing or revising textbooks that reflect human rights principles?<sup>10</sup>

Presently there are various guideline issued by NGOs and international organisations which educators can use.

Have textbooks been prepared according to these guidelines?

No

15. Please refer to any national or sub-national policies that promote a human rights-based approach to school governance, management, discipline procedures, inclusion policies and other regulations and practices affecting the school culture and access to education.<sup>11</sup>

In 2000 Malta embarked on a National Educational Reform with the creation of a new National Minimum Curriculum (NMC) entitled “Creating the Future Together” based on a belief in social justice and prescribes the implementation of inclusion (Principle 8).

The Education Act as amended in 2006 provides that “it is the right of every citizen of the Republic of Malta to receive education and instruction without any distinction of age, sex, belief or economic means”. It advocates that the Directorate for Education Services in conjunction with Colleges and schools, is to provide the resources and other schemes related to individual educational needs. Student Councils are mandatory in all schools It stipulates that Malta College of Arts, Science and Technology (MCAST) ensures access to all persons in full respect of any diversity. It also indicates that the National Commission for Higher Education shall propose policies related to students on sustainable options, equity in access and mobility in the institutions.

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<sup>9</sup> Plan of Action, appendix A.5(e)(ii)-(iv).

<sup>10</sup> Plan of Action, appendix A.5(e)(viii).

<sup>11</sup> Plan of Action, appendix A.5(e)(ix).

The Education system in Malta has given special attention to students with a disability. Policy documents included : a) 'Inclusion of Students with a Disability' (2000) outlining national guidelines on both informal and formal processes of preparing Individualised Educational Programmes (IEPs) and the necessary mechanism assessment recommending the nature of support; b) "Inclusive Education Policy Regarding Students with a Disability" (2001) aiming at the attendance of students with a disability in mainstream education; c) Special Examination Arrangements for Special Needs Students

In 2005, the Ministry of Education published a new Network Organisation for Quality Education in Malta entitled "For All Children to Succeed" (FACTS), which advocates the idea of networking among schools allowing internal diversity to enable the stretching of all abilities to the highest excellence possible. Within the same year the Malta Qualification Council (MQC) was set up to steer the development of the National Qualification Framework (NQF). It published four policy documents entitled 'Valuing all Learning' thus setting up a mechanism which acknowledges skills and competences, open flexible pathways and values the full range of knowledge and competence held by individuals irrespective of where and how they were acquired.

In 2006 the National Policy 'Early Childhood Education and Care' identified elements that are likely to promote equitable access to good quality service in education, offering an inclusive and flexible approach to diversity, without compromising quality or access.

In 2007 'A Career Guidance Policy and Strategy for Compulsory Schooling in Malta' was launched making recommendations on establishing an adequate career guidance infrastructure. It emphasises the principle that all individuals, irrespective of their personal or social characteristics, should be exposed to all possible career options.

The document 'Further and Higher Education Strategy 2020', the NCHE recommends: a) fair and open access to all students willing to further their studies; b) student support schemes for vulnerable groups.

16. Is there a comprehensive training policy on human rights education for teachers and other educational personnel in schools?<sup>12</sup>

No, but regular in-service courses in July and September are organised which have covered this aspect.

## **B. Learning environment**

17. Are human rights integrated into the learning environments of schools including school governance and management?<sup>13</sup> Please mark on a scale from 1 to 5 (1 = Yes, comprehensively, 5 = Not at all):

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<sup>12</sup> Plan of Action, appendix A.5(f).

<sup>13</sup> Plan of Action, appendix A.4.



*Yes, comprehensively* 1 2 3 4 5 *Not at all*

18. Do practices not defined as human rights education exist in your country which reflect the principles of the rights-based approach to education, such as peace education, citizenship and values education, multicultural education, global education, education for tolerance or education for sustainable development?<sup>14</sup> If yes, please explain.

Yes. These concepts already exist in different subject syllabi, like Social Studies, Personal and Social Development, European Studies, Geography, History and Religion. However one has to mention as well the various school or college-based activities that are organised in order to celebrate diversity, multiculturalism, peace and solidarity. One has to mention as well the various initiatives for schools that are regularly organised by the Curriculum Management and eLearning Department (CMeLD) to celebrate these. Currently the CMeLD is working in conjunction with CARITAS Malta on a national campaign in schools on the eradication of poverty and social exclusion. Other practices managed by the same department are the scheduled school visits for Form 4 student to the Courts of Justice and to the House of Representatives, where students are given a first-hand experience on their functions by members of the judiciary and the members of Parliament respectively.

19. Do opportunities exist in schools for students to express themselves freely, to have responsibility, to participate in decision making (in accordance with their age and evolving capacity) and to organize for their own interests?<sup>15</sup> Please mark on a scale from 1 to 5 (1 = Comprehensive opportunities exist, 5 = Not at all):

*Comprehensive opportunities exist* 1 2 3 4 5 *Not at all*

- To express themselves
- To have responsibility
- To participate in decision making
- To organize for their own interests

20. Are there interactions between schools, local government, civil society and the wider community facilitating awareness of children's rights and the key principles of human rights education?<sup>16</sup> Please mark on a scale from 1 to 5 (1 = Comprehensive interactions take place, 5 = Not at all):

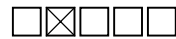
*Comprehensive interactions take place* 1 2 3 4 5 *Not at all*

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<sup>14</sup> Plan of Action, II B.

<sup>15</sup> Plan of Action, appendix C.15(c). See also General comment No. 1, United Nations Committee on the Rights of the Child, which states that "The participation of children in school life, the creation of school communities and student councils, peer education and peer counselling, and the involvement of children in school disciplinary proceedings should be promoted as part of the process of learning and experiencing the realization of rights" (para. 8).

<sup>16</sup> Plan of Action, appendix C.15(d).



NGOs and other entities promote human rights by organizing activities for students

21. Are monitoring systems in place to assess the following?<sup>17</sup> Please mark on a scale from 1 to 5 (1 = Comprehensive monitoring systems, 5 = Not at all):

<i>Comprehensive monitoring systems</i>	1	2	3	4	5	<i>Not at all</i>
▪ Respect for human rights principles in teaching practice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
▪ Teaching quality with regard to human rights education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
▪ Respect for human rights principles in school management and governance processes <sup>18</sup>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
▪ Changes in students' knowledge, skills, values, attitudes and behaviour with regard to understanding of and respect for human rights <sup>19</sup>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

22. Please outline how schools fund human rights education including sources and the percentage of State budget allocated in this area?<sup>20</sup>

### C. Teaching and learning processes

23. Do curriculum subjects in primary and secondary schooling include human rights education?<sup>21</sup> If so, which curriculum subjects include human rights education at primary and secondary levels?

PSD, Social Studies, European Studies, Geography and History

How many hours are taught and at what grade levels?

PSD - in the primary level (45 minutes weekly); in lower secondary level (1 hour weekly); in upper secondary level (45 minutes weekly)

Geography, History and Social Studies - in the secondary level (45 minutes weekly). From Form 3 onwards students can opt for these three subject thus having 4 lessons of 45 minutes each per week.

24. Do learning methodologies associated with these human rights education activities exist which are child friendly, learner-centred and encourage participation?<sup>22</sup> Please mark on a scale from 1 to 5 (1 = Yes, comprehensively, 5 = Not at all):

<sup>17</sup> Plan of Action, appendix D.19(f) and B.10(b)(x).

<sup>18</sup> Plan of Action, appendix A.5(e)(ix).

<sup>19</sup> Plan of Action, appendix A.5(e)(x).

<sup>20</sup> Plan of Action III E.

<sup>21</sup> Plan of Action, II B.20 and appendix D.19(a).

<sup>22</sup> Plan of Action, appendix D.19.

*Yes, comprehensively* 1 2 3 4 5 *Not at all*

There is a lot of valid work in the schools on these lines which include debates, group work and role play

25. Which institution(s) has/have the authority to develop, approve and change curricula?<sup>23</sup>

Directorate for Quality and Standards in Education

26. Do teacher guides, manuals, textbooks, and other teaching and learning materials in primary and secondary education conform with human rights principles?<sup>24</sup> Please mark on a scale from 1 to 5 (1 = Yes, comprehensively, 5 = Not at all):

*Yes, comprehensively* 1 2 3 4 5 *Not at all*

Are materials not produced by your Government being used in schools? If so, who produced them?

Yes such materials include those produced by NGOs, institutions as the EU, North South Centre, Oxfam and the United Nations

#### **D. Training of school personnel**

27. Is human rights education included in the following?

	<i>Yes</i>	<i>No</i>
▪ Pre-service teacher training	<input checked="" type="checkbox"/>	<input type="checkbox"/>
▪ In-service teacher training	<input checked="" type="checkbox"/>	<input type="checkbox"/>
▪ Head teacher training <sup>25</sup>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Is participation voluntary or mandatory?

All teachers have to attend for in-service training once a year but it depends upon whether the courses being offered are mandatory or voluntary

How many hours are offered?

12 hours

28. To what extent is learning, good practice, research and materials collected and made available to educators in human rights education?<sup>26</sup>

The end product of projects run as co-curriculum are CDs which are circulated among participating link teachers and copies are given to officials at the CMeLD and to foreign partners. Subject Associations also regularly issue a CD with related papers regarding

<sup>23</sup> Plan of Action, III D.28 and appendix D.19(c).

<sup>24</sup> Plan of Action, appendix D.19(c).

<sup>25</sup> Plan of Action, appendix E.26.

<sup>26</sup> Plan of Action appendix D.19(d).

HRE

29. To what extent do recruitment, appraisal and promotion policies for teachers, headmasters and school inspectors reflect human rights principles?<sup>27</sup>

NIL

30. How are human rights trainings for teachers assessed?<sup>28</sup>

All in-service courses are assessed by a questionnaire that is given to all participants at the end of the course

<b>Part 3: CHALLENGES AND GENERAL COMMENTS</b>
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31. To what extent has the Plan of Action for the WPHRE 1st Phase contributed to improving the integration of human rights education into schools systems?

32. Please indicate the main obstacles to the implementation of the Plan of Action to the 1st Phase of the World Programme in your country on a scale from 1 to 5 (1 = No obstacle, 5 = Major obstacle):

*No obstacle* 1 2 3 4 5 *Major obstacle*

- Lack of awareness of WPHRE at central government level
- Lack of awareness of WPHRE at local government level
- Lack of interest in WPHRE at central government level
- Lack of interest in WPHRE at local government level
- Teachers do not have sufficient training
- Insufficient tools available to implement the programme
- Insufficient financial resources to implement the programme
- Other (please specify):

33. Please indicate any actions undertaken by your country to ensure the World Programme is known amongst (1) education officials, (2) teachers and (3) young people.

Actions are actually taken by interested specific subject education officials (Social Studies, Geography, PSD) who disseminate it to their teachers who in the long run make it known to their students.

<sup>27</sup> Plan of Action, appendix C.15(b)(v).

<sup>28</sup> Plan of Action, appendix E.27(f).

34. Please indicate on a scale from 1 to 5 (1 = Used often, 5 = Not used) the usefulness of the following publications and/or tools available at

<http://www.ohchr.org/EN/PublicationsResources/Pages/TrainingEducation.aspx>

- |   | <i>Used often</i> | 1                        | 2                                   | 3                                   | 4                        | 5                        | <i>Not used</i> |
|---|-------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|-----------------|
| ▪ <i>WPHRE Plan of Action for the 1<sup>st</sup> phase</i>  |                   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                 |
| ▪ <i>ABC - Teaching Human Rights:<br/>Practical activities for primary and secondary schools</i>  |                   | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |                 |
| ▪ <i>Human Rights Education in the School Systems of Europe,<br/>Central Asia and North America: A Compendium of Good Practice<br/>(joint publication of OHCHR, OSCE/ODIHR, CoE and UNESCO)</i> |                   | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |                 |

35. (Optional). Please describe the methodology and process adopted in preparing your national evaluation report:

36. Please make any other comments not provided elsewhere:

THANK YOU.