



**HUMAN RIGHTS DEFENDER OF
THE REPUBLIC OF ARMENIA**



AD HOC PUBLIC REPORT

ON ENSURING THE RIGHT OF ACCESS TO WATER AND SANITATION IN PRESCHOOLS AND SCHOOLS



YEREVAN 2019



AD HOC PUBLIC REPORT



ON ENSURING THE RIGHT OF ACCESS TO WATER AND SANITATION IN PRESCHOOLS AND SCHOOLS

YEREVAN 2019

CONTENTS

INTRODUCTION.....	3
METHODOLOGY.....	5
CHAPTER 1.....	8
WATER AND SANITATION ACCESS AS A HUMAN RIGHT	8
1.1 CONTENT AND PRINCIPLES OF RIGHTS OF ACCESS TO	9
WATER AND SANITATION	9
1.2. CRITERIA FOR IMPLEMENTATION OF THE RIGHT OF WATER AND SANITATION	12
CHAPTER 2.....	17
ENSURING WATER AND SANITATION RIGHT	17
IN EDUCATIONAL INSTITUTIONS.....	17
2.1 FIXATION OF RIGHT OF WATER AND SANITATION IN THE LEGISLATION OF THE REPUBLIC OF ARMENIA	17
2.2 WATER SUPPLY, DRAINAGE AND HYGIENE IN EDUCATIONAL INSTITUTIONS	19
2.4 ABSENCE OF UNIFIED STATISTICS AND ACTIONS PROGRAM ON WATER AND SANITATION ACCESSIBILITY, LACK OF AWARENESS	64
2.5 SCHOOLS FINANCING AS A MATERIAL BASE OF IMPLEMENTATION OF WATER AND SANITATION RIGHT.....	69
CHAPTER 3.....	74
RESULTS OF STUDIES IMPLEMENTED IN SCHOOLS.....	74
RESULTS OF THE PRESCHOOL STUDIES.....	111

INTRODUCTION

Water is a source of life, and clean water and sanitation is an important guarantee for health protection. Ensuring access to water and sanitation is one of the priority issues that is put on the table for discussion of numerous states and international organizations. The conspicuous fact of the latter is the “2030 Agenda for Sustainable Development”, which was adopted by the world leaders during the UN Summit in September 2015. Such issues as access to water and sanitation also have been included in the 17 goals of the agenda. Particularly, the “Agenda 2030” aims to ensure access to water and sanitary conditions for everyone and the sustainable management of the latter, on its way solving the existing problems of general, equal access to safe and accessible drinking water up to ensuring adequate sanitary and equal sanitary hygienic conditions for all in the fields of water supply and drainage management improvement¹.

Issues in regards to access to water and sanitation also exist in the Republic of Armenia, and in order to achieve the goals defined in the “Agenda 2030”, it is necessary to implement appropriate steps in order to tackle existing problems and take measures towards their solution.²

The RA Constitutional Law on “The Human Rights Defender” of December 16, 2016 entrusted the monitoring of application of the provisions of the UN Convention on “The Rights of the Child”, adopted on November 20, 1989, as well as the UN Convention on “The Rights of Persons with Disabilities” adopted on December 13, 2006, as well as the implementation of the prevention and protection of the rights of children and persons with disabilities to the RA Human Rights Defender.

Based on the above-mentioned and taking into consideration the fact that children spend most part of the day in preschools or schools, in 2018, monitoring has been carried out in these institutions to study the current state of access to water and sanitation, gaps, problems and priorities.

Children, due to their age and legal capacity, need a special treatment, and ensuring the realization of their rights is of fundamental importance. A great number of international documents enshrine the rights and freedoms of the child in order to ensure that children are more secure and protected.

The most important guarantee for the health, observation of the hygiene rules of children is the access to water and sanitation. The receipt of the relevant knowledge and the high level of awareness, in their turn, should, be one of the guarantees for the implementation of the right of access to water and sanitation.

There have been frequent cases when access to water and sanitation was not ensured in the institutions, which has been discovered during the monitoring of the Human Rights Defender.

¹ <http://un.am/hy/p/sustainable-development-goal-6>

² <http://un.am/up/file/SDG6-CleanWater.pdf>

In this case, it should be noted that the inaccessibility and unavailability of water and sanitation in the educational institutions can have a negative impact on the health protection, development, world outlook, hygienic upbringing, as well as on the educational progress of the child.

During monitoring not only protection of the children's rights but also the status of the labor conditions of the employees, administration has been inspected.

METHODOLOGY

This report is based on the study of the legislation, international standards of the sphere, monitoring field visits to preschool and schools during 2018 and on the results of examinations of complaints addressed to the Defender carried out by the representatives of the Department of Children's Rights Protection, Research and Educational Center specialists, as well as water and sanitation specialist-experts of the Human Rights Defender's staff. The issues raised by the CSO's of the sphere and the published materials and studies of mass media have also been studied while preparing the report.

In 2017, representatives of the Human Rights Defender's Office took part in a special training in Geneva on "Human Rights and Water Management" to acquire new knowledge and skills on the sphere. The course was organized by "WaterLex"³ International Organization. The initiative of the National Human Rights Institutions for the water management intends to develop the capabilities of the mentioned institutions for a proper implementation of water management monitoring. By taking different steps, the organization intends to strengthen the capability of the National Human Rights Institutions for the effective implementation of preservation, protection of water right and other related rights. The training was specially projected for the development of capabilities of the staffs of RA Human Rights Defender and the Public Defender of Georgia.

A clear methodology has been developed by the representatives of the Defender's staff and experts for monitoring the access to water supply and sanitary services in preschool and schools within the framework of the program "Support for the implementation of sustainable development goals, the availability of water and sanitation as a human right".

Thus, special questionnaires have been developed by experts in advance, and the visits have been unannounced. Herewith, two separate questionnaires have been drawn up for monitoring both preschool and schools based on the requirements for the water supply and sanitation rules fixed by the internal legislation, international criteria and the UN sustainable development goals. Moreover, the questionnaires include questions containing both quantitative as well as qualitative components.

The questions included in the first questionnaire were given to the staff of the institution (e.g. the director, the deputy director) concerning provision of the institution building with twenty-four-hour drinking and running water, availability of complaints on the quality of the supplied drinking water and so on.

Questions reflected in the second questionnaire were filled in by experts and representatives of the Defender, through checking the access to water and the sanitation conditions in the toilets. The

³ "WaterLex" is a non-profit, non-governmental organization founded in 2010 and registered in Switzerland. The latter has the status of implementing special consultative functions in the UN Economic and Social Council and a special status in the "Partners of UN-Water". The organization has been working with National Human Rights Institutions since 2013 within the framework of the "Water Sphere Initiative" program. <https://www.waterlex.org/>

questionnaires include such questions as availability of separate toilets for girls and boys in the institution, as well as the availability of toilets adapted for the groups of disabled children and those with low mobility among others.

Rules of using water and sanitary services were subjected to a special study during visits. Particularly, availability of disposable cups for drinking water in general education institutions and the availability of individualized or non-individualized cups in preschools has been specified during the monitoring, at the same time, information was collected during private and confidential interviews conducted both with the staff of the educational institution as well as children studying there. This report also includes data received from the queries sent to the competent state authorities.

In the result of comparison and analysis of the information, documents and legislative regulations of the sphere gained during the visits, both practical problems as well as gaps and shortcomings in the legislative regulation have been revealed.

Schools have been selected from the Education Management Information System (www.emis.am) on an random basis. In the mentioned system the schools are classified according to three categories: 1. subject to capital repair; 2. needs current repair; 3. is in good condition. Accordingly, the visits were carried out both to the institutions in need of capital repair and current repair as well as those in good condition.

Thus, in May-June 2018, the representatives of the Defender's Office monitored 201 educational and elementary educational institutions in Yerevan and regions: 121 schools and 80 kindergartens (see Tables 1-2, 56-57).

During the visits, the activities of the Human Rights Defender have been introduced to the staff of institution as well as the essence and purpose of the study.

Monitoring has been carried out in the institutions both with small and large number of pupils (for example, monitoring has been carried out in the institution with 50 pupils within the framework of the project).

Special attention has been paid to the practice on carrying out works on the knowledge of the use of sanitary services among the children. Particularly, the administration of institution, as well as children have been asked corresponding questions to get information on the works of the staff of the institution on the children's knowledge of hygiene protection and use of sanitary services.

In the course of visits, representatives of the Defender's staff have also taken photographs, in order to record the sanitary conditions, in which both the positive as well as the negative results revealed by the monitoring are reflected.

At the end of the visit, raised problems have been discussed with the directorate of the educational institution so that the latter can correct them if possible. The problems and needs raised by the directorates have also been recorded.

This report introduces, in a systematized way, the problems revealed during the monitoring, the professional analyzes in that connection and the suggestions directed to their solution.

CHAPTER 1.

WATER AND SANITATION ACCESS AS A HUMAN RIGHT

The right of water and sanitation has been recognized as a human right by the UN General Assembly with the Recommendation 64/292 of July 28, 2010 and it has been accepted that the access to water and sanitation is fundamental for implementation of human rights.⁴ Water is a public weal having an essential significance for the human life and health. Water is one of the indispensable factors of the implementation of the right of a dignified life of a human being.⁵

Water is also the basis of sustainable development. Accordingly, the access to water and the protection of water resources have been reflected in the Sustainable Development Goals. Particularly, the 6th goal of the Sustainable Development is to ensure access and sustainable management of water and sanitation for everyone. Targets corresponding to the goals of the Sustainable development have been also envisaged that are fundamental for states and, accordingly, the policymaking and the implementation of the programs should be directed to the realization of those targets.⁶ Water resources and the services rendered by them are the basis for poverty reduction, economic growth and environmental sustainability.

The right of a child to water and sanitation access is directly enshrined by the UN Convention on “The Rights of the Child”.⁷

In accordance with the Points “c” and “e” of the second part of Article 24 of the Convention, the State-parties should take necessary measures to combat disease and malnutrition, including within the framework of primary health care, through, inter alia, the application of readily available technology and through the provision of adequate nutritious foods and clean drinking-water, taking into consideration the dangers and risks of environmental pollution; and to ensure that all segments of society, in particular parents and children, are informed, have access to education and are supported in the use of basic knowledge of child health and nutrition, the advantages of breastfeeding, hygiene and environmental sanitation and the prevention of accidents.

Part 2 of Article 37 of the RA Constitution defines that a prior attention should be paid to the interest of the child in the issues relating to the child. The principle of the best interest of the child is of an initial significance in the issues related with the rights of the latter. It is also enshrined in Article 3 of the Convention on the Rights of the Child, and, in general, the best interest of the child

⁴ http://www.un.org/waterforlifedecade/human_right_to_water.shtml

⁵ General comments of the Committee on Economic, Social and Cultural Rights No 15, The Water Right, E/C 12/2002/11, Paragraph 1.

⁶ <http://un.am/hy/p/sustainable-development-goal-14>, <http://un.am/hy/p/sustainable-development-goal-6>, http://www.un.am/up/file/SDGs_Targets_Indicators_ARMENIAN_FINALIZED.pdf

⁷ Was adopted on November 20, 1989, entered into force on July 22, 1993.

should unconditionally lay on the basis of all the legislative acts concerning the protection of the rights of children, relating to the rights of children. The firm observation of the principle of the best interest of the child is of great significance from the point of view of protection of the rights of the child. It is worth mentioning that the duty of the state is to ensure the observation of the best interest of the child and to create conditions for the protection and implementation of the rights of the child. The implementation of the rights of education and health care protection of a child is also conditioned by the fixation of the best interest of the child and the observation of that principle. In case of preparing a basis for the implementation of the rights of the child and, and in each case, considering the interest of the child a priority, the child will feel himself not only the object of protection, but the holder and realizer of the rights.

1.1 CONTENT AND PRINCIPLES OF RIGHTS OF ACCESS TO

WATER AND SANITATION

It is necessary to reveal and analyze a number of initial provisions in order to predetermine and more deeply comprehend the frames of the right of access to water and sanitation. These are the principles of equality and non-discrimination, access to information, participation (involvement), accountability, sustainable development which serve also as human rights guarantees playing a special role in the implementation of water and sanitation access rights.

Principle 1. Equality and Non-discrimination.

This principle implies non-discrimination as well as the duty of the state to ensure the equality of receipt of water and sanitary services from the point of view of access to water and sanitation. In its turn, the revelation of the principle of equality and non-discrimination requires targeted consideration of a number of issues. Thus,

- it is forbidden to manifest discrimination against individuals or groups depending on race, gender, language, religion, political or other views, national or social origin, property, birth or other status;⁸
- each case of discrimination manifestation must be under special attention of state and the latter must take effective steps in the direction of elimination of such cases and restoration of the infringed right. In this regard, it should be noted that some legislative regulations, being neutral, can also lead to discrimination;

⁸ See, for example, Article 2 (2) of the International Convention on Economic, Social and Cultural Rights (Adopted on December 16, 1966, received legal force on January 3, 1976) and Article 2 (1) of the International Convention on Civil and Political Rights (adopted on December 16, 1966, received legal force on March 23, 1976).

- states should take steps in the direction of reduction of inequalities so as to create actual equality for everyone in the issue of access to water and sanitary services;⁹
- states are obligated to ensure access to water, sanitary infrastructures and services for all irrespective of the land property form and the owner;¹⁰

Moreover, the targets of the 6th goal of the Sustainable Development are also aimed at reducing the access difference and ensuring equity. Particularly, this goal, as a target, envisages achieving universal and equal access to safe and affordable drinking water till 2030, adequate and equal sanitary-hygienic conditions for all by putting an end to the satisfaction of natural needs outdoors, paying a special attention to the needs of women, girls and those being in vulnerable situations.¹¹

Principle 2: Access to Information

The essence of the principle of access to information is that everybody should have an opportunity to search and receive information on both functioning and planned legislation, policy and programs on water and sanitation. States should make easy the access¹² to the corresponding information for the public, at that, with such means that will ensure the wide possible outspread¹³ of the information.

When speaking about accessibility, it should be also noted that states are obligated to take measures to ensure that this information is accessible to everybody, irrespective of the language, having disability etc.¹⁴

Finally, states should ensure that everyone has an opportunity to participate in awareness-raising programs on the theme of water and sanitation and the education of this sphere becomes accessible for all (e.g. courses on influence of sanitation on hygiene and health care and the environment).¹⁵

Principle 3. Participation (involvement)

⁹ The following social groups are considered to be risky in the essence of vulnerability: indigenous peoples, nomadic or traveling groups, sanctuary seekers, displaced persons and migrants, victims of natural disasters, persons deprived of freedom, elderlies, disabled persons, persons having chronic or serious illnesses, children, women, transgender or intergenerational individuals

¹⁰ See, The human rights to water and sanitation in courts worldwide, a selection of national, regional and international case law, available at the following link: https://hrbaportal.org/wp-content/files/Human-rights-to-water-and-sanitation-in-courts_WEB_2015.pdf

¹¹ http://www.un.am/up/file/SDGs_Targets_Indicators_ARMENIAN_FINALIZED.pdf, <http://un.am/hy/p/sustainable-development-goal-6>

¹² UNHRC «Report of the Special Rapporteur on the Human Right to Safe Drinking Water and Sanitation» (2011) UN Doc A/HRC/18/33 (UNHRC Planning Report) [72].

¹³ UNHRC «Report of the Independent Expert on the Issue of Human Rights Obligations Related to Access to Safe Drinking Water and Sanitation, Catarina de Albuquerque» (2009) UN Doc A/HRC/12/24 (UNHRC Sanitation Report) [66].

¹⁴ See, The human rights to water and sanitation in courts worldwide, a selection of national, regional and international case law, available at the following link: https://hrbaportal.org/wp-content/files/Human-rights-to-water-and-sanitation-in-courts_WEB_2015.pdf

¹⁵ The UN Committee on Economic, Social and Cultural Rights “General Comments 15” (n 1) [26].

Participation makes it possible to take into consideration the needs of everybody, ensures a more effective implementation of the process, which, in its turn, improves the sustainability of its results. Based on the fact that any decision or project connected with the right of water and sanitation has its impact on a number of fundamental human rights, then, it is necessary to carry out any initiative through a participatory and transparent process.

Moreover, one of the targets of the 6th goal of the Sustainable Development is to support and strengthen the participation of local communities in the improvement of water supply and drainage management.¹⁶

Principle 4: Accountability

State and private organizations and their officials rendering water and sanitary services should be accountable to water users for the access to water and sanitation and ensuring other rights arising from it. In order to ensure such an accountability, two requirements must be taken into consideration: *an effective means to restore the infringed right and the control responsibility*.

An effective way to restore the infringed right: those individuals and the social groups who believe that their rights have been violated should have an opportunity to apply to independent review mechanisms and courts in order to make their complaints heard and resolved.¹⁷

Control Responsibility: in this case, it is necessary to discuss the need of establishment of such mechanisms that form a possibility for monitoring and control over the provision of water and sanitation both for public and private persons. In order to have accountability tools in the water and sanitation system, it is necessary to introduce clear institutional mechanisms. The steps taken or the decisions made in this system should be of accountable nature and be regulated by appropriate control responsibility measures.¹⁸

States are free to delegate water and sanitation services to private operators. In this case, measures should be taken to create effective structures for the independent monitoring and restoration of infringed rights, ensuring the accountability of the private organizations of the sphere to the water users and state.¹⁹

¹⁶http://www.un.am/up/file/SDGs_Targets_Indicators_ARMENIAN_FINALIZED.pdf, <http://un.am/hy/p/sustainable-development-goal-6>

¹⁷ See, C. de Albuquerque, V. Roaf, On the right track – Good practices in realizing the rights to water and sanitation, p. 177, 2012, available at: www.ohchr.org/EN/Issues/WaterAndSanitation/SRWater/Pages/SRWaterIndex.aspx.

¹⁸ See C. de Albuquerque, V. Roaf, On the right track – Good practices in realizing the rights to water and sanitation, p. 206, 2012, available on the website www.ohchr.org/EN/Issues/WaterAndSanitation/SRWater/Pages/SRWaterIndex.aspx

¹⁹ See UNHRC «Report of the Independent Expert on the Issue of Human Rights Obligations Related to Access to Safe Drinking Water and Sanitation, Catarina de Albuquerque» (2010) UN Doc A/HRC/15/31 (UNHRC Non-State Actors Report) [63(h)].

In this case, the implementation of monitoring is important in terms of accountability. Accordingly, the states are obligated to create effective bodies and procedures to guarantee assurance of human rights by public and private services providers.²⁰

Principle 5. Sustainable Development

The right of access to water and sanitation should be implemented for the benefit of the present and future generations.²¹ Water as a resource should be a means of ensuring economic, environmental and social sustainable development.²² Sustainable development of water and sanitation services is based on a number of factors such as the existence of adequate infrastructures, satisfactory service, uninterrupted operation etc. In case of the absence or the insufficiency of the latter, there is a false impression of access to the services.²³

According to the general comments of the UN Committee on Economic, Social and Cultural Rights, the State-parties should adopt comprehensive and integrated programs to ensure the availability of sufficient and safe water for the present and future generations.²⁴ As an example, the Committee points out the protection of water resources from contamination, extra leakage of water from reservoirs by monitoring the existing resources and the effective use of water by the end-users etc.²⁵

1.2. STANDARDS FOR IMPLEMENTATION OF THE RIGHT OF WATER AND SANITATION

The study of legal regulations of water and sanitation has allowed to reveal those standards which can serve as a guide for the further processing of legal acts regulating the sphere.

Standard 1. Accessibility²⁶

Water and sanitation should be accessible for everyone on a sufficient and continuous basis for personal and household use at home or in the immediate vicinity of the house.

²⁰ See UN CESCR «General Comment 15» (n 1) [24].

²¹ See UN CESCR «General Comment 15» (n 1) [11].

²² UNHRC Independent Expert on the Issue of Human Rights Obligations Related to Access to Safe Drinking Water and Sanitation, «Good Practices» related to Access to Safe Drinking Water and Sanitation: Questionnaire» (2010) [question N 10].

²³ See, for a brief overview of shortcomings in water and sanitation infrastructures, see: UNHRC «Report of the Special Rapporteur on the human right to safe drinking water and sanitation» (2013) A/HRC/24/44 [4].

²⁴ See UN CESCR «General Comment 15» (n 1) [28]. Adopted at the 29th Conference of the UN Committee on Economic, Social and Cultural Rights on January 20, 2003 (*E/C.12/2002/11*)

²⁵ See, UN CESCR «General Comment 15» (n 1) [28]: Adopted at the 29th Conference of UN Committee on Economic, Social and Cultural Rights on January 20, 2003 (*E/C.12/2002/11*).

²⁶ See, this and the further statement standards in The human rights to water and sanitation in courts worldwide, a selection of national, regional and international case law, available in the following link: https://hrbportal.org/wp-content/files/Human-rights-to-water-and-sanitation-in-courts_WEB_2015.pdf

Mainly, it should be noted that water supply for personal and household use should be sufficient and continuous so that the user has the opportunity to use water regularly for drinking, washing clothes, preparing food, as well as personal and household hygiene.²⁷ It is also worth mentioning that the number of water sources should be such that the period of time for the collection and waiting for water is not unreasonably long.²⁸

Water and toilets should be accessible at home and in all the places where people spend most part of their day. States bear a special responsibility for ensuring access to water and sanitation in public institutions (e.g. schools, hospitals, refugee dwellings, penitentiary institutions, etc.), public places (e.g. shops, food objects, etc.), as well as in non-state bodies (private schools, private health care institutions etc.).²⁹

The manifestations of water and sanitation absence may even lead to the violation of the obligations undertaken by state under the European Convention on “The Protection of Human Rights and Fundamental Freedoms”. The decision on *Tadevosyan v. Armenia* is about the similar violation. Thus, according to Article 3 of the mentioned Convention, no one is to be subjected to torture or inhuman or humiliating treatment or punishment, and the absence of water and sanitation may lead to the distortion of the values preserved by the mentioned article. Meanwhile, the European Court has noted by its decision that the applicant was not allowed to make use of the toilet and drinking water freely during his stay at the place of detention. The European Court has stated its position that it is unacceptable to keep a person in custody in such conditions where the elementary needs of the latter are not ensured.³⁰ As a result, the European Court has stated a violation of Article 3 of the Convention.

Accessibility as an idea should be introduced in water and sanitary services tariffs and regulated by social security and subsidy schemes. Accessibility can be assessed by allocating the liquidated financial means envisaged for satisfying other basic needs and intentions from those financial means which are intended for water and sanitation services.

²⁷ See, UN CESCR ‘General Comment 15’ in ‘Note by the Secretariat, Compilation of General Comments and General Recommendations adopted by Human Rights Treaty Bodies’ (2008) UN Doc HRI/GEN/1/Rev.9 [12(a)], [37(a)] & [37(c)]; UNHRC «Report of the Independent Expert on the Issue of Human Rights Obligations Related to Access to Safe Drinking Water and Sanitation, Catarina de Albuquerque» (2009) UN Doc A/HRC/12/24 (Sanitation Report) [70]; UNHRC «Report of the Special Rapporteur on the Human Right to Safe Drinking Water and Sanitation» (2011) UN Doc A/HRC/18/33 (Planning Report) [8(a)]; UNHRC «Report of the Independent Expert on the Issue of Human Rights Obligations Related to Access to Safe Drinking Water and Sanitation» Catarina de Albuquerque» (2010) UN Doc A/HRC/15/31 (Non-State actors Report) [47(a)] & [47(c)].

²⁸ See, UN CESCR ‘General Comment 15’ (n 1) [37(a)].

²⁹ See The human rights of water and sanitation in courts worldwide, a selection of national, regional and international case law, available at the following link: https://hrbaportal.org/wp-content/files/Human-rights-to-water-and-sanitation-in-courts_WEB_2015.pdf.

³⁰ See paragraph 53 of the European Court verdict of December 8, 2008 on *Tadevosyan* against Armenia. Available at the link <http://static.echr.am//judgments/955dc9cad193222fdc1a754e46a1dd42.pdf>

Standard 2. Physical Accessibility

The normative content of the criterion “physical accessibility” first of all requires the availability of such infrastructures and their location in a way so that they are continually accessible to all users without exception, including persons with special needs, such as children, elderlies and persons with disabilities.

States should ensure certain minimum standards of water source and toilets location availability and maintenance, and the international standards should be a guideline for the national ones.³¹ At the same time, it should be noted that the mentioned criteria should be viewed as minimum requirements and states should constantly seek to the maximum introduction of standards of physical accessibility of water and toilets and their continuous improvement.

Water sources and toilets, besides of the easy accessibility and being set in taking into account the physical minimum risks, should be located in such places so that to ensure the physical security of all the users both at day and night hours.³² In order to ensure the above, it is extremely important to reveal the characteristic features of the location places of toilets and, hence, the choice of the area. States should take positive measures to ensure the physical security of all when using water sources and toilets.³³

Along with the introduced, it is also very important that water sources and toilets are projected in such a way that they are physically accessible to people. The mechanism of the removal of water from pipes and wells as well as the projection of toilets should be implemented taking into account the special needs of elderlies, children, disabled persons, as well as pregnant women.³⁴

Standard 3. Acceptable Nature

The essence of the acceptable nature standard is that when rendering water and sanitation services, it's necessary to take into account the cultural needs and preferences³⁵ of the recipients of the services, which once again confirms the affirmation that the involvement of the beneficiaries in the issues of water sources and toilets location and projection is extremely important for ensuring their acceptability criterion.

When speaking about the standard of water acceptance, first, it should be mentioned that it should not be turbid or have an unusual taste and smell, because in this case people may apply to

³¹ Water outlets should be located in such a way so that the total distance of taking water and return way does not exceed 30 minutes. In places where the sanitation is not possible at home in the short term perspective, maximum five households are to use the toilets. See WHO, UNICEF Joint Monitoring Program, JMP, Report of the Second Consultation on Post-2015 Monitoring of Drinking-Water, Sanitation and Hygiene, 2012, available http://www.wssinfo.org/fileadmin/user_upload/resources/WHO_UNICEF_JMP_Hague_Consultation_Dec2013.pdf. See also, G. Howard, J. Bartram, Domestic Water Quantity, Service Level and Health, WHO, 2003.

³² See UNHRC Sanitation Report (n 4) [75].

³³ See UN CESCR «General Comment 15» (n 1) [12(c)(i)]; UNHRC Sanitation Report (n 4) [75].

³⁴ See UNHRC Sanitation Report (n 4) [76].

³⁵ See UNHRC Sanitation Report (n 4) [80]; UNHRC Planning Report (n 3) [8(c)] and [71].

non-safe water alternatives.³⁶ Water sources, too, should be acceptable for use, especially taking into account personal hygiene, once again taking into account the cultural preferences and requirements of users.

The actual volumes of use cannot be predetermined only by the quantity of water sources. In order to be accessible, water sources and toilets must ensure the isolation and dignity of the users.³⁷

The toilets can be acceptable for the users only when their design and the usage conditions correspond to the users' requirements. The observation of the criterion of acceptability also requires isolation of users, and often in public places - separate toilets for women and men, in schools - for girls and boys.³⁸

Standard 4. Quality and security

Water and sanitation services should be rendered in such a way as to not violate the right of users and, in general, protect the right of the public for health. Water must be safe for use by people as well as for personal hygiene. It should be free of microorganisms, impermissible chemical compounds and radiological dangers, as in case of their availability water may threaten to health of people and even to life. Toilets should be safe from the point of view of hygienic and technical use.³⁹ All the toilets should be equipped with personal hygiene means, ensured with the possibility to wash hands with soap and water.⁴⁰

States should introduce executable criteria for water quality control. Thus, the World Health Organization⁴¹ has defined criteria for water quality, which can be a guideline for states. States should also take into account the fact that, it is possible that the ensuring of implementation of certain specific needs may not be taken into account in the defined minimum criteria (e.g. in cases of those who are especially vulnerable to infections), thus, these criteria should not be perceived as absolute. Moreover, states should localize and develop these criteria in the logic of the national or local situation of the corresponding country or territory. It is also very important to improve and perfect the mentioned criteria through the continuous work by states.

Summarizing the above mentioned, it should be noted that, besides ensuring the level of raising awareness in the direction of hygiene observation and education provision, states are obligated to control over water quality compliance with criteria, prevent water pollution, as well as

³⁶ See UNHRC 'Report of the Special Rapporteur on the human right to safe drinking water and sanitation' (2013) UN Doc A/HRC/24/44/Add.3 [25] (Mission to Thailand).

³⁷ See, for example, the abridgement of 2012 case of the Indian Supreme Court - Environmental and Consumer Protection Foundation against the Delhi Administration and others.

³⁸ See, UN CESCR "General Comment 15" (n 1) [12(b)]; UNHRC Sanitation Report (n 4) [72].

³⁹ See, UN CESCR «General Comment 15» (n 1) [12(b)]; UNHRC Sanitation Report (n 4) [72].

⁴⁰ World Health Organization, Intergovernmental Organization belonging to the United Nations Organization. It was founded on April 7, 1948. It has the goal of raising all the nations to the highest level of health care.

⁴¹ <https://www2.ohchr.org/english/bodies/crc/docs/co/CRC-C-ARM-CO-3-4.pdf>

ensure the observation of national regulations on used water purification, especially by the suppliers of drinking water.

CHAPTER 2

ENSURING WATER AND SANITATION RIGHT IN EDUCATIONAL INSTITUTIONS

In the Annual Communications and AD HOC Reports of the RA Human Rights Defender, continually a consistent reference is made to the issue of access to water and sanitation in pre-schools and schools, based on complaints addressed to the Human Rights Defender, the issues presented by the public sources and so on. The issue is constantly raised also by the pupils of the schools during the private talks with the Defender and his representatives, as well as during the visits to the Defender's office.

The problem has been also in the center of attention of international organizations. Thus, still in 2013, the UN Committee on the Rights of the Child considered the state of access to water and sanitation in preschools and schools problematic in its concluding observations.⁴² At the same time, it should be emphasized that the Committee has considered this issue just while assessing the issue of implementation of the right of education.

The studies show that the children also consider the issue of the accessibility to water and sanitation mostly problematic. Thus, the majority of the respondent pupils mentioned that the school infrastructures need improvement. In particular, 48% of respondents wanted water and sanitation conditions to be improved.⁴³

2.1 RIGHT OF WATER AND SANITATION ACCORDING TO THE LEGISLATION OF THE REPUBLIC OF ARMENIA

According to Part 1 of Article 12 of the Constitution of RA, state promotes the protection, improvement and restoration of the environment, the rational use of natural resources guided by the principle of sustainable development and taking into account the responsibility to the future generations. According to Part 2 of the same Article, everyone is obligated to care for the protection of environment.

Article 85 of the Constitution of RA envisages that everyone has the right of health protection in accordance with the law. According to Article 23 of the Constitution, human dignity is inviolable.

Accordingly, the mechanisms for detailed implementation of the abovementioned rights are defined by the laws. Thus, according to the Article 1 of the Law of RA on "The Rights of the Child", the state proceeds from the prior principles of preparing the child for a productive life in the society,

⁴² <https://www2.ohchr.org/english/bodies/crc/docs/co/CRC-C-ARM-CO-3-4.pdf>

⁴³ RESULTS OF REQUEST, "In Children's Opinion ...":
https://armenia.savethechildren.net/sites/armenia.savethechildren.net/files/library/YV_brief%20version_Final%20%20arm.pdf, page 19

development of social and creative activity, high moral qualities, patriotism and upbringing as an individual. The child is under the patronage and protection of the society and the state.

Part 1 of Article 7 of the Law defines the right of child to health protection and strengthening, and Article 8 defines the right of the child to have the necessary living conditions and defines that every child has the right of living conditions required for the full-fledged physical, mental and spiritual development.

Water accessibility and sanitation are fundamental from the point of view of implementing the right of the health protection and education of the children. Therefore, the state should take steps to create an appropriate environment. Lack of sufficient water and sanitation conditions contains risks from the point of view of spread of epidemics and diseases. It is also problematic for the children from the point of view of awareness raising on sanitation and hygiene and education, as a member of society. All these factors are directly related to the rights of the health protection and education of the child.

According to Part 2 of Article 6 of the Law of RA “On Education”, the state ensures the right of education with the normal operating of the educational system and the creation of socio-economic conditions for receiving education. Moreover, according to Article 49 of the same law, entitled “The Rights and Social Protection of Learners”, the educational institution promotes the creation of the necessary conditions for life, food, health protection, rest, physical and spiritual development of learners. Accordingly, the right of the child to receive education is crossed with the right of health protection as its full implementation can create conditions for the effective realization of the other right.

This idea is also fixed in the Law of RA “On General Education”, according to Part 1 of Article 22 of which, the school ensures safe and secure conditions for the implementation of the educational program, normal working regime, medical aid and service, necessary conditions for the physical development of learners and health strengthening, forms personal hygiene and healthy mode of life skills according to the procedure defined by the authorized body of the public management in the sphere of health care. Moreover, special attention is also paid to children with needs of special educational conditions.

Relevant regulations are also envisaged in the Law of RA “On Preschool Education”, according to Part 1 of Article 11 of which, the preschools ensure conditions corresponding to the sanitary-hygienic requirements for children’s development, upbringing, education and health strengthening. Accordingly, part 1 of Article 17 of the Law fixes that the local government bodies ensure conditions for preschool education.

Taking into account the abovementioned regulations, the legal regulations of water supply and hygiene in schools and preschools are envisaged by a number of sub-legislative legal acts which are directed to the prevention of the impact of dangerous and harmful factors, unfavorable conditions on the health of learners and the staff involved in the learning process and define the establishment of an institution (hereinafter referred to as institution) implementing new under construction,

reconstructed, exploitable general education programs, presented to the sanitary-epidemiological and hygienic requirements of the plot of land, area, the structure of rooms of the buildings, inventory, equipment, temperature conditions of the rooms of the institution, natural and artificial illumination, water supply and disposal of sewage, educational process regime, organization of medical aid and service of students, protection of the institution and the sanitary condition.

2.2 WATER SUPPLY, DRAINAGE AND HYGIENE IN EDUCATIONAL INSTITUTIONS

2.2.1 WATER SUPPLY: TWENTY-FOUR-HOUR DRINKING-SERVICE RUNNING WATER, DRAINAGE SYSTEMS

Chapter 4 of Order No 12-Ն⁴⁴ of March 28, 2017 of the Minister of Health of RA on “Approval of the Requirements and Norms N 2.2.4-016-17 Presented to the Educational Institutions Implementing General Educational Programs” and Annuling Order No. 82 of February 11, 2002 of the Minister of Health of the Republic of Armenia” defines the requirements presented to water supply and sewage disposal of the exploitable institutions. Thus, Point 66 of the Order envisages that the building of the institution is provided with twenty-four-hour drinking-service running water, drainage system, and in case of water supply schedule, at least the toilets (washbasins, toilet bowls) are ensured with water reservoirs for securing permanent running water. Water supply procedure is also envisaged by Points “ը” and “ժ” of sub-clause 3 of Point 20 of the Appendix defined by Decree No 1334-Ն⁴⁵ of September 3, 2010 of the Government of RA “On Approval of Internal and External Assessment Criteria of Activities of Schools of RA and the Implementation Procedure” according to which the school should be supplied with twenty-four-hour running drinking water and all the toilets of the school with twenty-four-hour running water.

Meanwhile, various studies show that there is a systemic problem with the access to water and sanitation in schools. As a result, the rights of children, such as the rights of health protection or receiving education are endangered. The lack of permanent running water first of all makes risky the issue of ensuring the accessibility of sanitation as well as endangers the issue of accessibility of clean drinking water. The schedule of water supply can be effective in some cases, if its schedule creates a real opportunity to ensure the right of access to water.

The 2018 annual report “On Social Condition of the Republic of Armenia”, published by the Statistical Committee of RA, introduces the building conditions of schools of the regions of RA and Yerevan for 2017/2018 academic year. According to this data, 72 out of 1421 schools in Armenia still do not have water supply.⁴⁶

⁴⁴ Hereinafter, Order No 12-Ն of 2017 of the Minister of Health of the Republic of Armenia

⁴⁵ Hereinafter, Decree No 1334-Ն of 2010 of the Government of RA

⁴⁶ https://www.armstat.am/file/article/soc_vich_2017_2.pdf, page 65

Lack of water supply has been revealed during the visits carried out for the elaboration of this report. In particular, 105 out of 121 monitored schools were ensured with twenty-four-hour drinking service running water, while in 1 school (Syunik region) out of the remaining 16 there is no water indoors, and in the other school it is with the schedule once in three days (Syunik region) and in 14 schools with a supply schedule (see Table 3). For example, during the visit to a secondary school of Khnatsakh community in Syunik, the school administration informed that the drinking water for the school was brought from the nearby spring, and once in three days impotable (due to the fact that the pipes are old, the color and the taste of water are changed) drinking water is supplied which is collected in tanks and used for toilets. Besides the spring water, the children also bring water to school in their own bottles. Water is also available by schedule, for example, at 10:00 a.m. and at the evening hours at school No 90 in Yerevan, every day from 8:30 a.m. till 2:00 p.m. in the Gladzor community school of Vayots Dzor region, 9:00 till 12:00 at Vernashen school.

During the visits made in the process of elaborating this report, it also turned out that there were many cases when the problem of access to water at school was not related with the institution, but with the water supply of the community where the school was located. They informed us at the secondary school of Vahan community in Gegharkunik region that water at school is accessible by the schedule which is available for the whole community, but it can't be called a schedule because there are no exact hours for water supply. Proceeding from the latter, the teaching personnel and the economic part employees bring water with buckets or bottles either from their own home or homes nearby to school.

Moreover, unlike the institutions of the urban communities, the problem is more obvious in the rural communities. Thus, water supply is lacking exclusively in the regional schools (e.g. in 15 schools of Aragatsotn region, 13 schools of Gegharkunik region, 12 schools of Shirak region).⁴⁷ The mentioned is extremely problematic and represents the general picture of the institutions functioning in Yerevan and the regions. In fact, children in Yerevan can make use of the drinking water, while different methods are used in the regions to ensure access to water (often also at personal expense). The studies carried out for the elaboration of this report testify that Ararat region stands out among the regions, where 75% of the monitored schools do not have twenty-four-hour water supply. The number of schools not having twenty-four-hour water supply in four regions makes 20-25%: Aragatsotn, Kotayk, Syunik, Vayots Dzor (see Table 4).

Along with the mentioned issue, it should be also noted that in some monitored schools water was not accessible due to the broken faucets or the lack of them. Moreover, during the study, there were cases when only one faucet was available in the whole school (for example, in one of the schools of No. 1 college of Stepanavan of Lori region, the faucet was available only in the toilet for girls). That is, even when there is permanent running water at school, it becomes senseless in case of lack

⁴⁷ https://www.armstat.am/file/article/soc_vich_2017_2.pdf, page 104

of a faucet as there is no possibility to use it. This is also problematic from the point of view of the best interest of the child, since, in fact, the latter is deprived of the access to water and sanitation.

Moreover, unlike the schools, there are no legal regulations in the current legislation concerning the preschools, particularly, the relevant construction norms, water quality, continuity and temperature of the supplied water, as well as sanitation.

Therefore, it is necessary also to envisage legal regulations and standards on construction norms, water quality, continuity and temperature of the supplied water, as well as sanitation for the preschools.

A compatible analysis has been applied as to the fact of the number of water supply cuts during the last year, the duration and the notification in advance on the water supply cut as a standard for the assessment of the availability of permanent water supply in schools. Thus, the provider is obligated to notify the water user about the reasons of termination or interruption of water supply and the time for restoring water supply in accordance with Point 4 of Part 2.4 of the Decree No 658-Ն⁴⁸ of June 1, 2017 of the Government of RA “On Annuling Decree No 130-Ն of January 22, 2004 of the Government of RA and the Record of Regulation of the Use of Drinking Water for Irrigation Purpose, Illegal Consumption of Drinking Water from the Drinking Water Supply Systems and the Illegal Use of Drainage (disposal of sewage) Systems”.

In the result of the study, it became clear that the management of 101 out of the 121 (83%) studied schools is notified in advance about the cut of water supply and the average water supply cut duration has been 2-4 hours (see Table 21-24). Only 64 (80%) out of the 80 preschools having participated in the study, are notified in advance about water supply cut, and in 6 institutions, according to the management, water isn't being cut off.

The mentioned indicators are important from the sanitary-hygienic point of view taking into account the fact that the lack of running water is a factor of risk for the spread of diseases. Therefore, it is extremely important that all the institutions are notified in advance about the water supply cuts. In addition, it is important that this notification is real, that is to say, create a real opportunity for the institutions to have full information and, thus, take steps to ensure water accessibility.

Therefore, it is necessary to take steps in the direction of ensuring real awareness exclusively of all the cases of water supply cut.

The location of the nearest water tap during the water supply cut, the period of time of not having access to water in the organization has been also studied during the monitoring, in a result of which it was recorded that it makes average 2-3 hours at schools, except of permanent water supply cases, and in case of water supply cut, average time for the storage of water is 20-30 minutes (see Table 74). At the same time, in the result of queries carried out among the 74 preschools participated in the study, it turned out, that in case of lack of water, the staff of the institution mostly uses taps of

⁴⁸ Hereinafter, Decree No 658-N of 2017 of the Government of RA

the nearby houses or the stored water (26%) as well as the fountain (18%). However, in a number of cases, according to information provided by the management of the institutions, in case of lack of water, a nearby water tap or source are not available (for example, the Arzakan preschool of Kotayk region). In another case, for example, the school directorate of the Aknalich community of Armavir region has informed that although a longtime lack of water is a rare event in the institution, in any case, the municipality sends a special car loaded with water.

In the institutions where practically there are no water supply cuts, the staff mentioned that, the activities of the institution will be temporarily suspended (see Table 73-77) in case of a longtime lack of water supply and the unavailability of water storage. For example, according to the administration of the Gyumri preschool “Smile” of Shirak region, although there have been only 2 cases of lack of water in a year, but there is no available nearby water source and they will have to stop work until the water supply is restored. The mentioned is naturally impermissible because, in this case, if a problem occurs, the right of education will be endangered which, at the same time, is problematic from the point of view of the best interest of the child. Moreover, it can also create complications for parents who will carry out extra actions for the arrangement of the care of the children.

Order No. 12-Ն of 2017 of the Minister of Health of RA envisages the legal regulation of sewerage arrangement in localities where there is no sewerage. For example, in the institutions placed in localities with non-sewer system, an internal sewer system is installed connected with a waste storage waterproof pit or the wastewater local cleaning equipment only in case of the availability of the local cleaning equipment. The sewage disposal from the waste storage waterproof pit is carried out by a specialized organization after the pit is 2/3 (point 69) filled. In this regard, it should be noted that only 21 out of the 121 monitored schools had a waste storage waterproof pit. Only in 5 (24%) of these schools the sewage disposal is carried out by a specialized organization, in the 5 (24%) the sewage disposal is not carried out by a specialized organization, and data on 11 schools (52%) are lacking.

However, problems have been revealed even in cases when the building is ensured with drainage and sewer systems. For example, although, there is a sewage disposal system in the Gavar No 8 school of Gegharkunik region, it works with shortcomings, and the wastewater disposal is implemented with difficulty. The drainage and wastewater disposal system of the Stepanavan No 2 School after St. Grigor Lusavorich of Lori Region, is blocked up due to being constructed incorrectly, the water is assembled and because of the pipes being old and rotten there always arises necessity to do extra work.

In the result of the studies, problematic cases which threaten to the health protection of the surrounding society and the environment have been also revealed. Thus, the wastewaters of the secondary school of Syunik community in Syunik region are being disposed flowing into the nearby gorge. In another case, the wastewaters of the Alaverdi No 1 school after Suren Spandaryan of Lori

Region, flow into the Debed River streaming beside the school. The sewage waters of the Azatan community secondary school of Shirak region run into the Jajur River. The sewage waters of the Benjamin community secondary school of Shirak region run into the nearby stream. The sewage waters of the Kuchak community secondary school of Aragatsotn region run into the nearby stream. The wastewaters of the Zorakan community secondary school of Tavush region run into the nearby gorge.

It should be pointed out that some countries have even forbidden water supply cuts taking into account the importance of water accessibility especially at the schools. Thus, in the Water Act of England and Wales dated 1999 the conditions are listed under which water supply cannot be stopped. The children's care homes and schools also make use of them.⁴⁹

2.2.2 WATER USE MEANS FOR DRINKING PURPOSES

The means of water use for drinking purposes have also been studied. The accessibility of drinking water in the educational institutions is of vital importance. Particularly, the way the children use the drinking water is of special attention. The latter is very important from the point of view of occurring bacterial, virus, fungal and parasitic diseases transmitted through water among children, its spread and the risks management.⁵⁰

Thus, according to Order No. 12-Ն of 2017 of the Minister of Health of RA, the corridors (recreations) of newly constructed and reconstructed institutions are ensured with a fountain of drinking water managed by water flow to use water for drinking purposes (Point 9). There are no other legislative regulations, so each institution has given an individual solution to the issue.

Although the mentioned legislative regulation has been fixed in 2017 and refers to newly constructed and reconstructed institutions, nevertheless, the issue has also been studied during the visits for assessing the current situation. Thus, during the studies carried out in the schools, it became clear that in the studied schools, they drink water from fountains in 33% cases in urban schools and 7% in rural areas, which gives us an opportunity to make an idea of the availability of fountains in the institutions (see Tables 12-15). During the visits, such cases have been raised when the children drink water only from the fountain because it is the only opportunity. For example, water is not accessible indoors in the Vanatur community secondary school of Syunik region, so the children have to drink water from the fountain outside the school building. The mentioned is especially

⁴⁹ Water industry act 1999. <http://www.legislation.gov.uk/ukpga/1999/9/contents>

⁵⁰ According to the data of the World Health Organization, 80% of the infectious diseases are mainly conditioned by the water factor, which is connected with the violation of sanitary and hygienic norms of water supply and insufficient quality indices of the drinking water. The diseases spread by water are infectious and non-infectious. The violation of sanitary norms and rules of the organization and exploitation of water supply leads to outbreak of diseases. Cholera, abdominal typhoid and paratyphoid, dysentery, salmonellosis, etc., are spread through water. (The material is fully accessible at the following link): <http://www.armwater.am/files/adb/Gap/Gender%20training%20 2015.pdf>

problematic in terms of health protection of the children using drinking water in winter or cold weather.

It should be also taken into consideration that as of July 2018, 58 people make use of the fountain, 33 of which are pupils. Such a situation is also problematic in terms of hygiene, as in this discussed case the mentioned 58 people also use the fountain for washing (see Photo 1).

Photo 1



Moreover, in some of the monitored institutions, although, there was a fountain inside the school or in the yard of the institution, but they were out of order or the water was closed by the main valve. Thus, in case of availability of a fountain at the Vanadzor primary school No 1, however, the children do not make use of it as it is out of order, and for example, the fountain works only in summer at the Charentsavan school No 4 of Abovyan region, and the flow of water is closed in winter.

According to the data provided by the school administration, in some schools, children make use of cups in the buffets, and in some schools, disposable cups are provided (the Kapan No 2 Senior High School).

However, there were cases during the visits, when the disposable cups, foreseen for drinking water, after being used, were collected, washed and again given to the children (the Aparan School No 1).

There were also schools where no cups were foreseen for children. Thus, they informed from the Kapan No 3 secondary school that the children mainly drink water from cupped hands and the

children studying up to the 4th class drink water from the bottles brought from home. Data have been received on the Alaverdi School No 2 after Hovh. Tumanyan of Lori region, the Ararat school No 4 of Ararat region, the Aparan school No 2 of Aragatsotn region, the Yerevan school No 51 about drinking water from cupped hands. This way of drinking water is impermissible as it is risky in terms of spread of infections and various diseases and does not ensure the principle of the health protection of the child. The children having no sufficient awareness of the mentioned issues, become particularly risky in terms of spread of infections. As a result, it causes danger from the point of view of health protection of the child. There were no hand dryers or disposable paper towels in the school toilet, as a result of which the child does not have even an opportunity to dry his hands after drinking water from cupped hands.

And in some cases, in the result of the queries it became clear that the children drink water from the cups brought from home (the Goris No 1 school).

Accordingly, the studies show that the methods used for drinking water at schools are risky from the point of view of the spread of infections, and the regulation of Order No. 12-Ն of 2017 of the Minister of Health of RA at that the corridors (recreations) of newly constructed and reconstructed institutions are ensured with a fountain of drinking water managed by water flow to use water for drinking purposes is not sufficient to solve the problem in practice.

Moreover, during studies, both the school administration and the children informed that one fountain often is not enough for the children because it is extremely difficult for the children to make use of the fountain especially in big schools.

Therefore, it is necessary,

- 1. to elaborate a clear time-schedule for ensuring the availability of a fountain in the buildings constructed until the adoption of Order No 12-N of 2017 of the Minister of Health of RA;*
- 2. to amend Order No 12-Ն of 2017 of the Minister of Health of RA, as an intermediate solution, envisaging clear regulations for the use of drinking water by the children in the school, taking into account the risks of spread of infections. This can be foreseeing disposable cups;*
- 3. to review the requirement of Point 9 of the above mentioned Order, to envisage corresponding norms on the number of fountains, taking into account the number of children in the school.*

Taking into account the significance of access to water in preschools, different ways of use of drinking water have been studied here, too, during the monitoring. The study of the legislation shows that here there are no clear norms, as a result of which different institutions solve the problem in different ways. Thus, children drink water from individual cups or bottles in 59 out of 80 preschools (74%) having participated in the study. Meanwhile, in 26% of cases, the children drink water from the common cup (see Table 67).

Particularly, children at the Tegh community preschool No 2 of Syunik region were using non-labeled, common cups, although according to the employees, each time they wash the cups. The

same situation was also at the Kapan preschool No 2. This condition does not proceed from the principle of the best interest of the child, it is strictly impermissible and obviously endangers the health of children. The risk of spread of infections and microbes is also great.

In rural preschools, in 34% of cases children drink water from a common cup, and in urban institutions this percentage ratio makes 22% (see Table 68) (see Photo 2). The presented data show that the probability of spread of infections among the children is higher in rural communities as compared with the urban communities. Particularly, common cups most of all are used in the regions of Syunik (83%), Ararat (50%), Shirak (40%) and Vayots Dzor (40%), in Yerevan (47%), and comparatively less in Lori (19%) and Tavush (8 %) regions (see Table 69). For example, according to information received during the visit to the Aragats community secondary school No 2 of Aragatsotn region, only one cup is foreseen for drinking water, which is used by all the schoolchildren. This situation is strictly impermissible as it is dangerous from the point of view of the risk of spread of epidemic diseases among children.

Photo 2



In the result of the study, it also turned out that the individual cups or bottles are mainly distinguished by the pictures of animals or fruit (see Photo 3).

Photo 3



According to the employees every child knows his own marking and no problem arises in this respect. Meanwhile, this option is also risky in terms of spread of infections as children can easily drink from each other's bottle. Moreover, in the result of monitoring it was recorded that the bottles are mainly identical, and the markings are confusing.

The described situation is problematic as it creates additional risk from the point of view of the health protection of the children and raises the probability of spread of infections.

As a problem solution, for example, children drink water with disposable cups in the Yerevan preschool No 22 provided by the kindergarten. In some institutions, according to the employees, children are given only boiled-cooled water, and in some cases children bring bottles of water with them to avoid the possible infections.

Accordingly, it is necessary to amend Order No 857 of 2002 of the Minister of Health of RA envisaging clear regulations on the making use of drinking water in the preschool, taking into account the risks of spread of infections. This can be achieved by a concrete norm according to which the

children will be provided exclusively with such cups for individual use which can be easily distinguished from other cups or disposable cups.

Besides the abovementioned, other ways of storing water have also been prevalent. Accordingly, in the result of the visit to the Lernapar community preschool of Lori region it turned out that besides water brought in bottles from home, every day, the employees of the institution store water in a glass container for the use on the next day. Drinking water was kept in a simple bucket in the Spitak preschool No 2, and the cup for drinking was dipped into water of the bucket. These data naturally testify about the risky options of water storage, in the result of which water itself can be dangerous for the health of the child. Thus, according to the Drinking Water Quality Guide of the World Health Organization, storing water in a bucket is on the list of the methods that are dangerous in terms of the health of persons. Moreover, it is noted that water can be stored in a bucket only half an hour before the use.⁵¹

Therefore, it is necessary to envisage standards in regards to the means of water storage by a legal act, ensuring the possibility of its safe use.

2.2.3 QUALITY OF DRINKING WATER

The studies of the current legislation of RA testify that a differentiated approach is not manifested to the quality of the supplied water in the educational institutions. According to Point 67 of Order No 12-Ն of 2017 of the Minister of Health of RA, the quality of drinking water from the centralized water supply system, including from the reservoir capacities of the institution or from the own source of the institution, must comply with the requirements of Order N 876 of December 25, 2002 of the Minister of Health of RA.

The general legal regulation of water quality is envisaged by Point 2.1. of Order No 876⁵² of December 25, 2002 of the Minister of Health of RA “On Drinking Water. Hygienic Requirements for Drinking Water Quality of the Centralized Water Supply Systems. Quality Control” On Approval of Sanitary Norms and Rules N 2-III-A2-1”, according to which the quality of drinking water supplied by the water supply systems must comply with the requirements of the mentioned sanitary rules.

Point 3.1. of the same Order defines that drinking water should be safe from the epidemiological and radiological point of view with harmless chemical composition and have favorable sensitivity properties. According to Point 3.2. of the Decree, the quality of drinking water before entering the water distribution network, as well as in water withdrawal points of the external and internal water

⁵¹ https://www.who.int/water_sanitation_health/dwg/fulltext.pdf, pages 64, 107

⁵² Hereinafter, Order No 876 of 2002 of the Minister of Health of RA

supply networks, should comply with the hygienic norms mentioned in Annexes 1, 2, 3, 4, 5 and 10 of the same Decree.

Thus, the abovementioned Annexes describe in details the norms of permissible microbiological and parasitic indicators in water, frequently met harmful chemicals and the permissible limitary concentrations of substances of anthropogenic origin, norms of the imported into the water supply system and the generated permissible limitary concentrations of harmful chemicals during the processing of drinking water, the norms of the sensitivity indicators of drinking water, the norms of radiation safety of drinking water, the hygienic normative of content of harmful substances in drinking water, as well as the statement rules of the quality control indicators of drinking water.

The study has been carried out through oral queries during the visits, as not all the schools, mainly in the cities, are included on the list of drinking water quality monitoring points. The results of the private talks with the staff of the educational institutions testify that 10 (13%) out of 80 preschools subjected to study have complaints about the quality of supplied drinking water (see Table 65).

The complaints mainly concerned water sensitivity indicators in 5 urban and 5 rural communities which have complaints about drinking water quality. At that, the complaints about the quality of the supplied drinking water in rural preschools make 17%, while in urban it is 10% (see Table 66).

Staffs of 21 schools (17%) have made complaints on the water quality out of the 121 studied schools, out of which 14 (67%) urban, and 7 (33%) rural (see Table 18). At that, water quality complaints mainly referred to the water sensitivity indicators.⁵³ For example, it was raining during the visits to schools in Dilijan, which became the reason that the running from the faucet water got brown coloring and was turbid (the Dilijan No 4 and Senior High Schools, the Haghartsin community school). According to one of the principals of the schools, the recorded situation is permanent during the precipitations, which is not only peculiar to the school, but also to whole Dilijan. In the Mayisian community secondary school of Shirak region after opening the faucets turbid water with yellow coloring was coming (rust-water), which was passing after some time in case water ran. Despite the last mentioned, we cannot clearly state that after the disappearance of the yellow turbidity of water it was good for drinking, especially in case when checkups of water quality were being carried out by the directorate of the school once in a quarter. In this case, we also become witness of waste of water as the most important resource, as due to the worn-out pipes, each user is obliged to leak the running water for a while.

⁵³ According to the mentioned Order, the sensitivity indicators are: smell (changes water smell), color (causes water coloring), foam (generates foam), membrane (generates a membrane on the surface of water), taste (gives taste to water), opalescence (generates an opalescence), turbidity (causes turbidity).

During the visit to the Vernishen preschool of Vayots Dzor region, it turned out that after storing running water from the faucet in reservoirs, sediment is left, and the similar situation is also in case of the educational institution of the Chiva community of the same region.

In the result of the compatible study of the data provided by the Ministry of Territorial Administration and Development of RA, it became clear that the expertise of water samples of the subordinated to the latter institutions were carried out only in Kotayk, Lori and Armavir regions. Particularly, microbiological and chemical expertise of 119 samples of drinking water of the Armavir region schools and kindergartens was carried out in 2017, and from January to November 15, 2018 microbiological and chemical expertise of 121 samples of drinking water, in the result of which no deviations has been recorded. Water samplings from the water supply systems in the subordinated to the Kotayk Regional Administration institutions are carried out monthly and in the vulnerable communities twice a month. The results of the implemented laboratory tests are summarized; the heads of the communities are given instructions on eliminating the shortcomings.

2.2.4 HOT WATER SUPPLY

The legislation defines that in a number of cases, hot water supply accessibility should be foreseen in the classrooms. Thus, according to Point 144 of Order No 103-N of 2014 of the Minister of Urban Development of RA, hot and cold water supply should be envisaged in the classrooms of 1-4 classes and extended-day group rooms, in the rooms of sketching, fine art, information and electronics, engineering simulation, young naturalists, circles of painting and sculpture, home economics workshops, teacher's room, workshops, technical staff rooms, shower-rooms and personal hygiene booths, cinema and photo laboratories, toilets and medical rooms, chemistry, physics and biology laboratories. Hot and cold water supply in the buffet, kitchen and dining hall is envisaged based on the technological requirements.

At that, Point 145 of the Order also defines that the temperature of hot water supplied to the mixer taps of washbasins should not exceed 60 ° C.

According to Order No 12-N of 2017 of the Minister of Health of RA, the classrooms of 1-4 classes, physics, chemistry, biology, painting, technology rooms, canteen, shower-rooms, and doctor's room of the newly constructed or reconstructed educational institutions are ensured with washbasins with cold and hot water supply (Point 10). In this case, the legal act regulates the requirements for hot water supply in newly constructed and reconstructed institutions as well, but the existing situation in the institutions built before the adoption of the legal act has been also assessed by it. The issue is that legal regulations have a logic in themselves and they cannot be legitimately different for different groups or institutions. Those regulations are aimed at the health protection of the children. The health peculiarities of the children of the age group indicated in the mentioned legal act, as well as the frequency of water use in the classrooms mentioned in the legal

act, bring forth the necessity of the actual accessibility of hot water supply. Therefore, it is necessary to assess the whole situation so as to create a possibility to carry out assessment of needs and accordingly elaborate clear actions to bring all the institutions in line with the requirements.

The study carried out within the framework of drafting of this report testifies that in practice a number of schools are not provided with hot water supply. Thus, data in terms of the availability of hot water supply at schools are presented in the annual report on “Social Situation of the Republic of Armenia” of 2018 published by the Statistical Committee of Armenia. According to the mentioned report, 1287 out of 1421 schools do not have hot water supply.⁵⁴

Moreover, data gathered show that there is no hot water supply at all the schools of some regions or the data available is too small. Thus, there is no hot water supply in any school of Vayots Dzor, and for example, in Syunik region, there is hot water supply only at 3 schools.⁵⁵ However, it should be also noted that, there were many cases when hot water was accessible only in the kitchen sector in case of availability of hot water supply (the Tchambarak primary school in Gegharkunik region). According to data provided by the administration of the Vanadzor preschool No 33, hot water is available only in winter when the heating system is turned on. The data provided by the Yerevan preschool No 139 testify that here, too, hot water is available only in winter.

Visits carried out during the elaboration of this report also reaffirm the above-mentioned. Thus, in the result of monitoring, it has been revealed that the majority 86% of schools having participated in the study do not have hot water supply, at that, this indicator in the urban and rural schools almost do not differ: 88% and 82% (see Tables 44, 45).

As to the preschools, Part 5.1. of Order 857 of 2002 of the Minister of Health of RA fixes that hot water supply is necessary to be ensured in the kitchen, laundry, the tender age children (the 1st group) playrooms, in the buffet section of all the groups and toilets with the availability of mixer taps.

Thus, 51 (64%) out of 80 preschools having participated in the study have had the junior age (the 1st group) playrooms, 63% of which were not ensured with hot water supply (see Table 78). At that, the junior age (the 1st group) playrooms were not ensured with hot water supply in 72% of cases of rural preschools and 58% of cases of urban organizations (see Table 79, 80).

The buffet sections of all the groups were not ensured with hot water supply in 53% of cases of the monitored 70 preschools (see Table 82). At the same time, the data analysis shows that the lack of hot water supply of the buffet sections is more common in rural communities (60%), and is almost equal in urban areas (49% do not have) (see Table 83). Armavir (100%), Kotayk (75%), Syunik (67%) and Tavush (60%) regions are comparatively in a worse condition (see Table 84).

⁵⁴ https://www.armstat.am/file/article/soc_vich_2017_2.pdf, page 65

⁵⁵ https://www.armstat.am/file/article/soc_vich_2017_2.pdf, page 104

The availability of hot water supply in the toilets of preschools proceeds from the point of view of the best interest of the child, hygiene, the health protection of the children and is extremely significant. Therefore, it is strictly impermissible that the lack of hot water supply makes 66% in the 80 preschool organizations having participated in the study (see Table 85). At that, in urban institutions it makes 65%, in rural it is 69%. Thus, there was hot water supply only in the kitchen section of the Yerevan No 52 preschools. The same situation was also in the Yeghegnadzor preschool No 1, the Vernashen and the Malishka preschools. Though water heaters are installed in the buffet sections of the Yerevan No 72 preschool, but they do not work.

The provision of hot water supply is almost equal in the urban and rural localities, (see Table 86), and there is a lack of hot water supply in the toilets (100%) in the studied preschools in Aragatsotn, Ararat, Armavir, Kotayk and Vayots Dzor regions (see Table 87).

One of the requirements envisaged in Part 5.1. of Order No. 857 of 2002 of the Minister of Health of RA, is that in preschools the hot water connected to the showers and washbasins should be no higher than 37° C. Meanwhile, in the result of the monitoring, it is recorded that the abovementioned requirement is not ensured in 65% of cases of 80 preschools having participated in the study (see Table 87.1, 88, 89). For example, during the visit to the Spitak preschool No 2 of Lori region, the hot water connected to the washbasin was so hot that it was impossible to keep hands under its sheet. The employees of the Zorakan community preschool of Tavush region have introduced that up to 55° C hot water is connected to the washbasins.

As a positive tendency, it is worth stating that a number of institutions have passed on to the workstyle of providing hot water supply through solar energy. Particularly, the hot water supply is provided by solar heaters in the Sevan No 2 “Hekiat” (“Fairy Tale”) of Gegharkunik region, the Lermontovo community of Lori region, the Noyemberyan No 2 of Tavush region preschools.

2.2.5 HYGIENE CONDITIONS: AVAILABILITY OF TOILETS

Order No 12-Ն of 2017 of the Minister of Health of RA has fixed the hygienic requirements presented to the educational institutions implementing general educational programs. Thus, Chapter 3 of this Order defines the hygienic requirements presented to the structure, rooms, stock and equipment of the exploiting institutions, which are fixed in Points 27-32 of the given Order. Particularly, according to Point 27 of the Order, at least by one toilet for girls and boys is to be disposed on the floors of the institutions which should have complete surfaces, the floor should be tiled or covered with another waterproof cover. A toilet for the staff is foreseen in each building.

Moreover, in accordance with Point 17, by one separate toilet for boys and girls is foreseen in the educational structural sections of 1-4 classes of the institution.

In the result of the visit and studies, a situation has been revealed when the toilet bowls, though, visually were in good repair, but it turned out that the water drain tank was out of order (e.g. the

Gyumri school No 9, the Maralik school No 1, the Armavir school No 6, the Charentsavan school No 4, the Yerevan school No 178) (see Photo 4).

Photo 4





Moreover, according to Point 27 of the Order, at least by one toilet for girls and boys is to be disposed on the floors of the institutions which should have complete surfaces, the floor should be tiled or covered with another waterproof cover. A toilet for the staff is foreseen in each building. In accordance with Point 17 of the same Order, by one separate toilet for boys and girls is foreseen in the educational structural sections of 1-4 classes of the institution.

However, the study reveals that this requirement is ensured not in all the schools in Armenia. Thus, the availability of toilets in the educational structural sections of 1-4 classes (foreseen by one separate toilet for boys and girls) has been studied in 109 out of 121 schools (where there are 1-4 classes) having participated in the study, in 41 out of them there are not envisaged separate toilets for the 1-4 classes (see Tables 25-27), which is extremely problematic. It is highly important to note the mentioned norm, as making use of the same toilet by children of different age groups can be problematic in terms of raising the risk of violence among children. Moreover, the presented can have serious consequences for the sexual education and psychology of children, and be dangerous for the implementation of the right of the health protection of the child.

As to the requirement of disposition of at least by one separate toilet for girls and boys on each floor of the institution, it turned out that the 35% of the buildings of the 121 schools having participated in the study do not have separated toilets by gender on each floor (see Table 28, see also Table 30). At that, in 52% of buildings of the rural schools having participated in the study did not have even one toilet on each floor (see Table 29). Thus, a separate toilet for boys and girls is foreseen

only on the first floor of the Aparan No. 1 school. One toilet is foreseen for boys which is on the 2nd floor and for girls on the 3rd floor in the Yerevan No 12 school. A similar picture has been also recorded at the Yerevan No 68 school.

At the same time, the monitoring allowed to record that, in some cases, even at the availability of separate toilets for boys and girls on each floor of the school, their doors were locked, in the result of which their use practically was not possible.

Moreover, there were shared toilets for boys and girls at some schools (the Beniamin community secondary school of Shirak region, a toilet functioned only in one building of the Ketik community secondary school of Shirak region and about 70 pupils make use of only that toilet, the Yerevan school No 171, the 1st floor of the Yerevan secondary school No 114).

The study of the international experience testifies that the disposition of toilets in a separate compartment is viewed in terms of privacy protection of the child and the exclusion of violence as well. Thus, according to the guide on the school premises standards envisaged for the State and Local Government Bodies, proprietors, heads of school, school staff, in the schools of the UK where there are shared toilets for boys and girls, the personal immunity should be strictly observed, which can be implemented, for example, by the installation of high doors of compartments and partitions.⁵⁶

Moreover, the study also showed that there was not a separate toilet available for the staff in some schools. For example, 75% of the monitored schools in Armavir region are not ensured with toilets foreseen for the staff (see also Table 53-55). Thus, there were available toilets, separated for men and women, foreseen for the staff at the Yeghegnadzor school No 1 and the Malishka community school of Vayots Dzor region. However, it should be noted that there were cases when there was a toilet available only for the representatives of the male staff of the school (the Yerevan senior high school No 127).

The lack of separated toilets is problematic in terms of increasing the risk of violence cases present among children. Especially, the use of the same toilet by children of different age groups can be risky for the younger children. Moreover, making use of the same toilet can be extremely risky for teenage girls and boys in terms of violence in the event of lack of sufficient awareness.

According to Point 84 of Order⁵⁷ No 103-N of April 9, 2014 of the Minister of Urban Development of RA “On Significance of General Educational Buildings” Approval of Constructional Norms”, the toilet bowls should be installed in closed compartments in the lavatories. The compartments should be separated from each other by partition screens of 0.2 m up to floor and not less than 1.8 m in height from the floor. The layout dimensions of the compartments should be 0.8 x 1.2 m. One of the compartments for girls should be in full extent (for personal hygiene) with the 1,8 x 1,2m layout dimensions.

⁵⁶ A guide on the school premises standards envisaged for the State and Local Government Bodies, proprietors, heads of school, school staff, the United Kingdom, page 6

⁵⁷ Hereinafter, Order No 103 of 2014 of the Minister of Urban Development of RA

In the guide on “Water, Sanitation and Hygiene Standards for Schools in Low-cost Settings” of the World Health Organization notes that in order to reduce the risk of violence, sexual harassment as well as to ensure sufficient confidentiality, toilets should be disposed correctly so that the safety and confidentiality of the user are observed. The toilet doors should have the possibility to be locked from inside and be left unlocked in case of not making use of them in order to ensure their accessibility.⁵⁸

Meanwhile, a number of problematic and impermissible cases have been recorded during the visits when the toilet bowls in the lavatories were not installed in closed compartments, which is also problematic in terms of privacy immunity, sexual education and psychological formation. Moreover, it is also unacceptable from the point of view of the best interest of the child. Representatives of the Defender’s staff have also recorded that the toilet bowls in the lavatories of the institutions were not separated from each other even by partitions (see Photos 5-8).

Photo 5



Photo 5.1

⁵⁸ World Health Organization, “Water, Sanitation and Hygiene Standards for Schools in Low-cost Settings” 2009, page 23



Photo 6



Photo 6.1



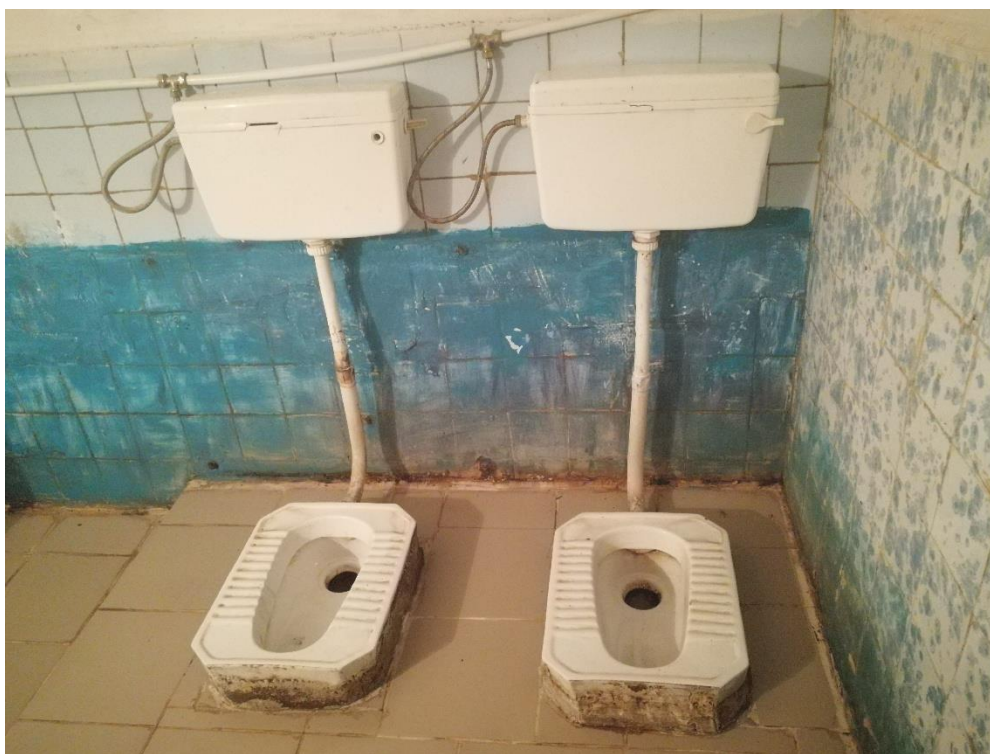
Photo 7



Photo 7.1



Photo 8

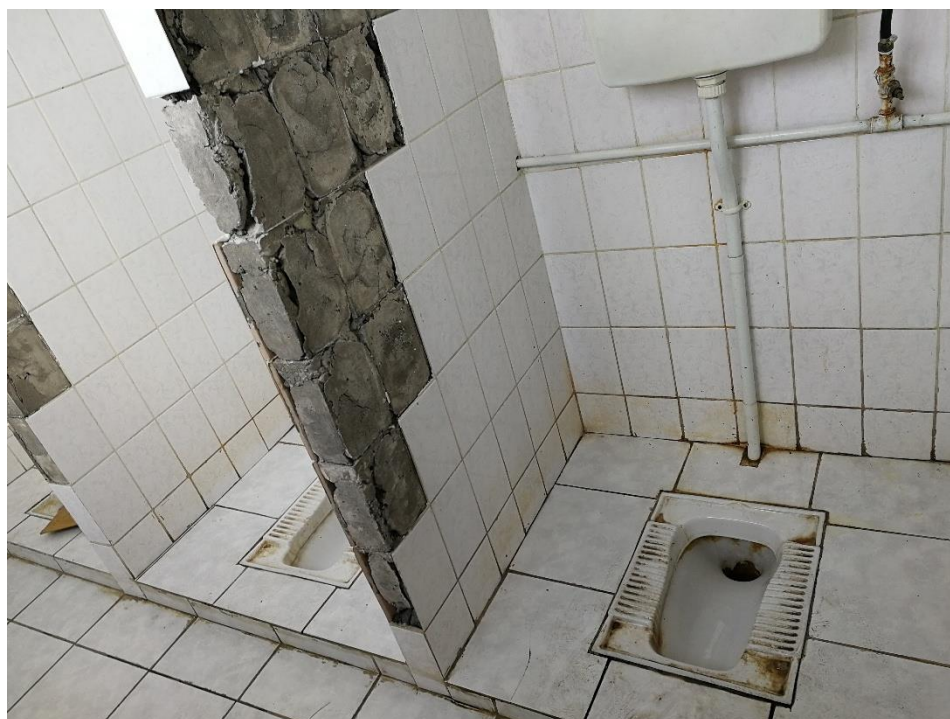


In some schools, though, there were partitions, but there was lack of doors (see Photos 9 and 10). For example, there were partitions in the toilets of the Yerevan secondary school No 38 but the doors were not available.

Photo 9



Photo 10



This situation is extremely problematic and contains dangerous risks for the health of children. This situation is fraught with the risk of violence, infringes the dignity of children and is impermissible in terms of implementation of the right of personal hygiene and sanitation. During the private talks with the Defender's representatives, the children have repeatedly mentioned that they avoid making use of the toilet. A situation occurs when the health of the child is endangered.

Order No 857 of 2002 of the Minister of Health of RA does not regulate the issue of the installation of toilet bowls in closed compartments in the lavatories in preschools. However, the study of the international experience shows that toilet bowls in preschools are installed in separate compartments.

The study of the international experience testifies that there is a special requirement for the availability of separate doors between the toilets in other countries as well. Thus, in Ireland, the 2014 Guide on "Sanitary and Hygienic Facilities in Primary Schools" defines the technical standards for the sanitary and hygienic facilities in the educational institutions.⁵⁹ The mentioned standards also

⁵⁹ <https://www.education.ie/en/School-Design/Technical-Guidance-Documents/Current-Technical-Guidance/TGD%E2%80%932-Guidelines-and-Standards-for-Sanitary-Facilities-in-Primary-Schools-1st-Edition-April-2014-.pdf>

require that each toilet should mandatory have a door. There is such an example in Singapore Republic, where sanitary norms require that the toilets should have doors.⁶⁰

Thus, the 2014 guide on “Toilet Design, Service and Education of the Preschool” of Singapore mentions that, taking into account the great probability of injuries resulting from the door collision incidents among the persons of preschool age, the doors should be replaced with curtains or folding doors as a security measure.⁶¹

Another standard is envisaged in the South Australian guide on “Early Childhood Facilities”, which states that secret doors should be installed in the preschool toilet cubicles.⁶² In connection with the abovementioned, it should be stated that the notion “secret doors” used in the guide supposes that the toilet bowls should be separated from each other and be safe for the health and life of the child in technical terms.

This issue should also be considered in the context of respect of the privacy of the child. Thus, according to Part 1 of Article 16 of the UN Convention “On the Rights of the Child”, no child shall be subjected to arbitrary or unlawful intervention of his/her privacy, family, home or correspondence, nor to unlawful attacks on his or her honor and reputation.

Numerous cases have been reported during the visits, when the toilet bowls in the lavatories were not installed in separated toilet cubicles. Moreover, the representatives of the Defender’s staff have recorded that the toilet bowls in the lavatories of the institutions were not separated by partitions.

Moreover, studies carried out in the framework of this report testify that the requirement for the rooms to be in good order is also not fully observed in practice. To get a complete picture of the problem, it should be noted that the toilets do not have complete surfaces in 26% of 121 studied schools (see Table 31, see also Table 32-33) (see Photos 11-13).

Photo 11

⁶⁰ https://www.bca.gov.sg/data/ImgCont/439/05_Sanitary%20Provisions.pdf

⁶¹ <https://www.toilet.org.sg/articles/GuideBetterPreschoolToilet.pdf>

⁶² <https://www.education.sa.gov.au/sites/default/files/early-childhood-facilities-birth-to-age-8-design-standards-and-guidelines.pdf?v=1459296603>



Photo 12



Photo 13



Moreover, numerous cases have been reported during the monitoring, when there was no toilet inside the buildings, instead they were outdoor toilets (see Photos 12 and 13). In response to a

query regarding to this issue, the Ministry of Education and Science of RA has provided information that 3 out of 74 studied schools, subordinated to the Ministry, have a toilet outside the building, which, according to the Ministry, is mainly used as reserve ones. The issue of the toilets located outside the building of the school has been also studied within the frames of this report. Thus, summarizing the data provided by the Ministry of Territorial Administration and Development of RA, we can state that the toilets of a great number of regional schools are located outside the building of the school. According to the presented data, the toilets of 13 out of 118 schools subordinated to the Aragatsotn Region are located outside the building of the institution, the toilets of 6 out of 107 schools subordinated to the Ararat Region are located outside the school building, 16 schools have toilets both inside and outside. The toilets are located outside the building of the institution in 31 schools out of the 111 schools subordinated to the Armavir Region and 6 preschools out of the 61 preschools under the regional subordination. The toilets are located outside the buildings of the institutions in 33 out of the 148 schools subordinated to the Shirak Region. The toilets are located outside the building of the institution in 21 out of the 111 schools subordinated to the Syunik Region. The toilets are located outside the building in 10 out of 45 institutions in Vayots Dzor region, and the toilets are located outside the building of the institution in 30 out of the 46 institutions subordinated to the Tavush Region.

In this respect, it should be noted that the pupils and the directorate of the monitored schools, where the toilet is located outside the building, have informed of the inconveniences that outdoor toilets cause , which becomes most apparent in cold weather conditions.

According to the data provided by the Yerevan Municipality not a toilet of an institution under the Municipality is located outside the building, unlike the regions.

The representatives of the Human Rights Defender's staff have also recorded cases of location of the toilets outside. For example, the toilet of the school is located outside the building in Aknaghbyur community of Tavush region (see Photos 14 and 15).

The mentioned is extremely problematic. First, it is dangerous in terms of child health protection, especially, during winter and cold weather. Besides weather conditions, the risk increases cases of violence against children and raises possibilities for children to appear in dangerous situations in the event of being out of school and not under the direct control of the teaching staff.

Photo 14



Photo 15



According to Order No. 12-N of 2017 of the Minister of Health of RA, the toilet bowls and other equipment of the institution are being exploited in good repair. The disrepair of washbasins, toilets bowls and urinals, water barrels, ventilation systems and other equipment is removed immediately (Point 28). Meanwhile, the monitoring in preschools and schools testifies that these rules are not observed in practice (see Photo 16).

Photo 16



The problem of malfunctioning of equipment was more emphasized in the educational institutions located in rural communities. Thus, in 45% of cases of the rural studied schools, toilet bowls and other equipment are in bad condition (see Photo 17).

Photo 17



Although the Yerevan Municipality, the Ministry of Territorial Administration and Development, the Ministry of Education and Science of RA have provided information on the

renovation of toilets of some schools for the recent years, however, the provided data testify that a unified time-schedule for the implementation of repairs is not available. Thus, according to the information provided by the Ministry of Education and Science of RA, toilets of 32 schools subordinated to the Ministry have been repaired in 2017 and 2018, and it is planned to repair toilets of another 29 institutions in 2019.

According to the information provided by the Yerevan Municipality, the toilets of 230 secondary schools and 207 kindergartens subordinated to the Municipality have been repaired during 2017, 2018 (see Photo 18).

Photo 18



According to the data provided by the Ministry of Territorial Administration and Development of RA, repair works of toilets of a number of schools have been implemented and it is still envisaged to carry out them in different regions in 2019. For example, the toilets of 94 schools out of 107 schools subordinated to the Ararat region have been repaired in 2018, and it is envisaged to repair or build another 129 toilets in 2019. 12 toilets have been repaired in 111 institutions subordinated to the Armavir Regional Administration in 2017-2018, and it is envisaged to repair toilets in another 26 educational institutions during 2019. The mentioned picture exists in almost all the regions, but, for example, the information on the institutions subordinated to Aragatsotn region is remarkable, according to which, the 2019 state budget of RA does not envisage the implementation of repairs of toilets of educational institutions, as projects envisaged for construction and renovation of schools in 2019 by the medium-term expenditures program (MTEP) for urban development in Aragatsotn

region for 2019-2021 are not included in the 2019 draft budget of RA. However, the data on water and sanitation in the schools, subordinated to Aragatsotn Regional Administration testify about the availability of a great number of problems, and in the result of lack of budgetary financial support, the existing situation will not change positively during the coming year.

In a number of cases, not all the toilets of the schools were repaired, and in fact, the whole burden has been falling on the repaired toilets as the pupils found it comfortable to make use of it (see Photo 19). In the result it appears that the toilet is formally available but because of being in bad repair is not subject for use.

Photo 19



Thus, only the toilet on the last floor of a three-storey building of the Stepanavan school No 1 in Lori region has been repaired during the study, as a result of which, for example, the pupil being on the first floor prefers to go upstairs to the third floor to make use of the comfortable toilet.

2.2.6 HYGIENE SECUREMENT

According to Order No 12-N of 2017 of Minister of Health of RA, the toilets and equipment of the institution are kept in clean condition, are ensured with liquid soap, hand-dryer electrical appliances or disposable paper towels, toilet papers. In order to be protected from flies, the small windows of the toilets are shut in with net (Point 29).

Thus, it should be noted that, in a few institutions there were toilets equipped with electrical appliances for hand drying during the visits (see Photo 18).

Photo 18



Such an example is the Noyemberyan high school of Tavush region the toilet of which was equipped with such a device.

The toilets and the equipment of the 71% of the 121 schools having participated in the study are not provided with liquid soap (see Table 46, see also Tables 47-48), 76% of the toilets are not provided with toilet paper (see Table 49, see also Table 50), and only 7% of the toilets of the schools are provided with hand-dryer electrical appliances or disposable paper-towels (see Table 51).

These norms ensure accessibility to sanitary services and are essential elementary items for personal hygiene. Their lack can become the basis for the spread of various infections, thus damaging the health of the children.

The record of such problematic indicators from the point of view of sanitary accessibility is connected with a number of reasons. During the visits to the institutions, besides the lack of financial and economic support, the administration also mentioned that children damage the hand-dryer electrical appliances, waste the paper and the liquid soap, in some cases, they take them home. During some private talks with the principals, the latter admitted that they were unaware of the abovementioned requirements, that's why the toilets were not provided, for example, with liquid soap, toilet paper or nets were missing from the small windows (see Photo 19).

Photo 19



The abovementioned allows to state that besides of the lack of financial provision, the implementation of the right of sanitary accessibility is infringed because of the lack of awareness and hygienic upbringing of the pupils, and in some cases, because of the lack of competence of legislative regulations of the management personnel.

The studies testify that there is also the problem of the lack of cleanliness in the toilets of schools and preschools (see Photo 20).

Photo 20





During the visits cases have been recorded when the toilet floors were rather dirty. Moreover, the cleaning goods and disinfectant solutions were found in the toilets and were not stored in a separate room or a cabinet.

In some cases, the staff of the school ensures the cleanliness at their own expenses. Accordingly, Alaverdi high school No 5 noted that they buy the chlorine used for school cleanliness at their own expenses.

According to Part 3.8 of Order No 857⁶³ of December 20, 2002 of the Minister of Health of RA “On Approval of N 2.iii.1 Sanitary Norms and Rules of Preschools (Institutions)”, in the toilets for middle and senior nursery groups two baby washbasins are installed, 1 adult and 1 baby toilet bowls (with hygienic seats), a trap, a shower plate, one towel in the junior nursery toilet. A washbasin with an elbow-shaped mixer tap is installed in the reception room and the playing room.

Thus, 76 (95%) out of the 80 preschools having participated in the study have had medium and senior nursery groups. In 72% cases of monitored institutions, the toilets are provided with baby washbasins (see Photo 21).

Photo 21

⁶³ Hereinafter, Order No 857 of 2002 of the Minister of Health of RA



It becomes clear from the presented data that the indicator of non-provision with baby washbasins is higher in rural localities (38%), especially in Syunik (67%), Tavush (46%), Aragatsotn (50%) and Ararat (50%) (respectively, Tables 97, 98).

In 47% of cases out of 76 preschools with middle and senior nursery groups having participated in the study were provided with baby toilet bowls (with a hygienic seat) (see Table 99) (See Photo 22).

Photo 22



The indicator is important in terms of accessibility of sanitary-hygienic conditions for the preschool age children. The lack of baby toilet bowls in urban localities (56%) is higher as compared with the rural localities (44%), and is more common in Syunik (100%), Tavush (64%), Gegharkunik (62%) Lori (56%) regions and Yerevan (64%) (see Table 100).

An almost general phenomenon can be considered the fact that though the toilets of a number of preschools were provided with a baby toilet bowl, but hygienic seat over it was missing. In response to the question on the lack of it, the representatives of the institution informed that hygienic seats are being taken away to prevent the spread of infections, and what is more, they easily break.

There have been recorded cases in a number of institutions, when baby toilet bowls were not installed in the lavatories, however, steps were taken directed to adjust them for the children. Thus, for example, in the Haghtanak community preschool of Tavush region, stone tiles were placed at the bottom of the toilet bowl thereby reducing the distance between the toilet floor and the toilet seat. A similar solution was given at the Noyemberyan preschool No 2, as well (see Photo 23).

Photo 23



It also turned out that the toilets were provided with a trap, a personal towel only in 29% cases out of 76 preschools with middle and senior nursery groups having participated in the study (see Photo 24).

Photo 24



Meanwhile, a trap and a towel are missing in 42% of cases in the rural preschools (see Table 101, see also Table 102). The indicator is important for maintaining washing and hygiene. The situation of the sanitation and water accessibility in the Amrak community preschool of Lori region is to be especially marked out. The kindergarten had only one toilet which is located outside the institution. It was a wooden small house without a sewage disposal system (see Photo 25.1). It was impossible to maintain cleanliness and hygiene rules even though measure and efforts are undertaken. Both girls and boys as well as the employees of the preschool institutions use that the same toilet. There was no washbasin, there was only one faucet in the kindergarten, and the employees insisted that the children washed outside the institution with water stored in bottles (see Figure 25.2).

Photo 25.1



Photo 25.2



It should be noted that according to Part 3.8 of Order No. 857 of 2002 of the Minister of Health of RA, 4 baby washbasins 3 baby toilet bowls, a shower plate and separated by a partition compartments, a shower with a flexible hose pipe and 1 towel should be installed in the junior 2nd and middle groups.

Only 91% and 90% of monitored institutions provide respectively baby washbasins and baby toilet bowls (see also Table 103-106). The toilets of 16 (76%) out of 68 preschools with the junior 2nd and middle groups having participated in the study are equipped with flexible hose pipe shower and towel.

Meanwhile, 81% of urban pre-schools and 65% of rural preschools lack shower with a flexible hose pipe and towel i(see also Table 107). Moreover, the problem of the lack of a shower with a flexible hose pipe in the toilets of the junior 2nd and middle groups exists on the whole territory of the Republic of Armenia which makes 50% and more (see Table 108). The indicator is important in terms of accessibility of sanitary conditions and hygiene (see Photo 26).

Photo 26



Although Order No 857 of 2002 of the Minister of Health of RA does not define that the toilets of the institution are to be provided with liquid soap, as it is mentioned in Point 29 of Order No 12-N of the Minister of Health of RA for the schools, however, that indicator also was studied during the monitoring. Availability of liquid soap has been recorded almost in all the preschools. Cases were also recorded during the monitoring carried out in the institutions when soap (not liquid) was placed

in the toilets of the institution, which is problematic in terms of personal hygiene and spread of infections.

Separated toilets for girls and boys often were not available at higher and preparatory groups. During the visit to the Lori region preschool No 2, it became clear that separated toilets for boys and girls very often were not available at higher and preparatory groups as well, whereof the kindergarten administration informed that the children use the toilet in turn by gender. It turns out that in the described situation, the accessibility of water and sanitation is not ensured for each child which is contrary to the principle of the best interest of the child.

Accordingly, it is necessary to amend Order No 857 of 2002 of the Minister of Health of RA envisaging clear regulations on the availability of liquid soap in the toilets of preschool institutions.

2.2.7 WATER AND SANITATION ACCESSIBILITY FOR CHILDREN WITH DISABILITIES

The World Health Organization Guide envisages that the standards for the toilets for children with disabilities include a ramp, wide door, sufficient space inside to move with wheelchair, adapted toilet bowls and handles.⁶⁴ Such an example is also defined in the UK schools standards (are applicable for the community centers, special schools and other institutions), according to which in toilets for children with locomotor system problems, stairs and other obstacles should be excluded, and toilets should be in such a place that the children are not obliged to cross a distance of more than 40 meters.

⁶⁵

Part 1 of Article 24 of the UN Convention “On the Rights of Persons with Disabilities” defines that State Parties recognize the right of persons with disabilities to education. In order to implement this right without discrimination and equal opportunities, state parties ensure the system including all the spheres of education at all levels, as well as education throughout life. Part 5 of the same Article envisages that state parties ensure the access to general higher education, vocational education, the adults’ education and education throughout life without discrimination and on an equal basis with others for persons with disabilities. To that end, state parties ensure that persons with disabilities are provided the necessary opportunities.

According to the Appendix of Decree No 1334-N of 2010 of the Government of RA, the school should be provided with twenty-four-hour running drinking water, renovated toilets separated for boys and girls should be available on all the floors, *and for persons with disabilities there should be*

⁶⁴ https://www.who.int/water_sanitation_health/publications/wash_standards_school.pdf

⁶⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/410294/Advice_on_standards_for_school_premises.pdf

an adapted toilet near which the availability of a distinguishing disability mark is necessary (paragraph “j” of subparagraph 3 of point 20).

The data provided by the competent state bodies as well as the studies carried out for the preparation of this report reveal an anxious picture as the majority of the institutions are not adapted to the needs of persons with disabilities.

Thus, according to the information provided by the Ministry of Education and Science, as of October 31, 2018, the toilets of the 20 out of 74 schools subordinated to the Ministry are adapted to persons with disabilities, however, the Ministry does not collect statistics on the types of disability, so it is not clear whether the given toilets are adapted for persons with locomotor system or visual problems.

According to data provided by the Ministry of Territorial Administration and Development of RA, as of October 31, 2018, the toilets of only 4 out of the 76 schools subordinated to the Tavush region are adapted for persons with disabilities. Adapted toilets for persons with disabilities, including those with visual problems are available only in 25 schools of regional subordination out of 149 schools subordinated to the Lori region.

Three out of 90 schools subordinated to the Kotayk Region are adapted for persons with disabilities, including those with visual problems, and 5 toilets out of 111 institutions subordinated to the Syunik Regional Administration are partially adapted for persons with disabilities. The most alarming picture is in the schools subordinated to the Aragatsotn, Vayots Dzor and Ararat regions, where there are no toilets at all and they are not adapted for persons with disabilities, including those with visual problems.

Adapted toilets for the group of children with disabilities and low mobility are only available in 8 out of 121 schools monitored during the preparation of this report (see Table 52). In spite of their availability, however, it should be noted that, in some cases, the toilet entrances entail obstacles for the group of children with disabilities and low mobility connected with making use of them on their own, for example, the entrance door frame had a certain height against the floor surface.

It was recorded during the monitoring that the toilets of only 2 (3%) out of the 80 preschools were adapted for the group of children with disabilities and low mobility, which is very significant in terms of equal sanitary and hygienic conditions (see Photos 26-30).

Photo 26



Photo 27



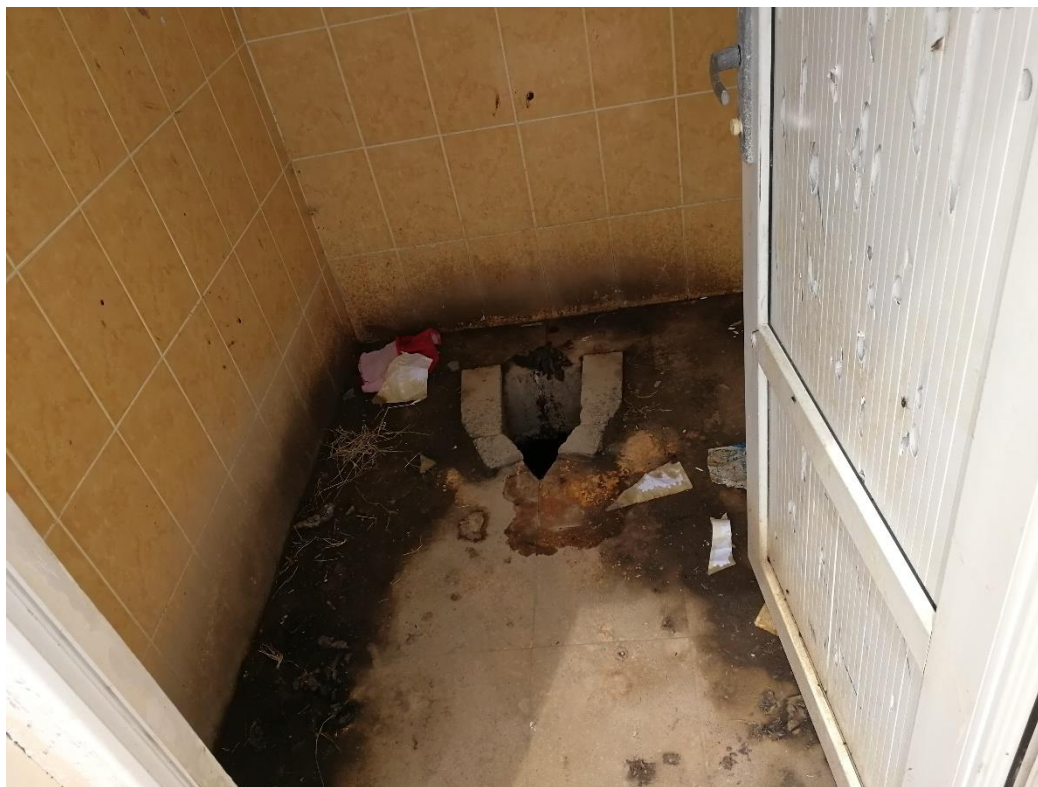
Photo 28



Photo 29



Photo 30



Information was received during the visit to the Vanadzor No 19 school of Lori region, that a child with locomotor system problems was studying at school, but this school was not adapted for persons with disabilities as well. The described case is noteworthy, as according to the received information, the child's mother who works in the buffet helps the pupil with locomotor system problems in making use of the toilet. In another case, an Asian-style toilet in the Azatamut community secondary school of Tavush region was not accessible for a pupil with disabilities studying at school whom his classmates were helping to use the toilet.

Information on a similar case was also provided at the Vanadzor primary school No 3, the toilets of which are not adapted for children with disabilities as well. In this school, a child with locomotor system problems is studying, whose parents or teachers help him to use toilet.

As regards to the institutions subordinated to the Yerevan Municipality, 45 are adapted for persons with disabilities (see Photo 31).

Photo 31



It should be also noted that in many cases, to the question on the availability of toilets adapted for persons with disabilities, both in the monitored schools and preschools an answer was received that no child with disabilities is studying in the institution. The last mentioned once again proves the lack of awareness of the heads of the institutions.

2.4 ABSENCE OF UNIFIED STATISTICS AND ACTIONS PROGRAM ON WATER AND SANITATION ACCESSIBILITY, LACK OF AWARENESS

The study of the information provided by the Yerevan Municipality, the Ministry of Education and Science and the Ministry of Territorial Administration and Development testifies that unified and differentiated statistics on the accessibility of water and sanitation in the schools is not collected periodically.

Thus, only 132 schools function under the subordination of the Ministry of Education and Science. It should be noted that the control on the accessibility of water and sanitation in the schools subordinated to the Ministry and its compliance with the regulations prescribed by the legal acts are carried out in the context of common, building and other utility problems, without defining periods of time as well as in the event of specific necessities. The Ministry does not carry out monitoring, no centralized statistics are collected on the accessibility of water and sanitation. In particular, each institution presented its own data on the queries submitted by the Human Rights Defender,

subsequently, data has been received from 74 schools, and the Ministry suggested the data of the rest 58 institutions to be presented on demand. Although the presented data on 74 schools may provide some idea on the current condition of the schools subordinated to the Ministry, however, it should be noted that, in case of implementation of monitoring and collecting unified statistics, the Ministry will also have a possibility to receive a clear picture of the accessibility of water and sanitation in different institutions. It should be also noted that disaggregated statistics are not collected on the accessibility of water and sanitation and the tools required for the implementation of this right separately in the rural and urban institutions accordingly.

The Ministry of Territorial Administration and Development of RA also does not collect disaggregated statistics on the accessibility of water and sanitation. The data provided by the different regional administrations identify this issue. Thus, in response to the question submitted to the Ministry of Territorial Administration and Development of RA on collection of disaggregated statistics on water and sanitation accessibility for the rural and urban institutions separately, only the Shirak Region provided a positive answer, and in cases of the other regions either the corresponding information was missing or was negative. In fact, this is systemic issue, as the Yerevan Municipality does not collect differentiated statistics on water and sanitation accessibility by different criteria, as well.

Moreover, because of the reorganization procedure of the inspection bodies, information has not become accessible in a unified form in that case, as well. Thus, in recent years, systematic and major check-ups on the observation of the requirements presented for water supply and sanitary rules fixed by the domestic legislation have not been carried out by the inspection body in the schools and preschools.

The problem is that in accordance with Decree No 839-A of July 30 2015 of the Government of RA the inspections have been suspended from August 1, 2015 till December 31, 2017. Meanwhile, the mentioned decree defines that the state bodies as established in Article 2 of the Law “On Organizing and Carrying out Inspections in the Republic of Armenia” of the Republic of Armenia, except the tax and customs authorities, as well as the inspection bodies established under the Law “On Inspection Bodies” of the Republic of Armenia may carry out inspections from August 1, 2015 till December 31, 2017 only:

- 1) in the state managerial institutions, state non-governmental organizations, community non-commercial organizations, with 100% state share closed joint-stock companies and with 100% community share closed joint-stock companies;
- 2) in the cases envisaged by the Criminal Procedure Code of the Republic of Armenia;
- 3) on the basis of written application of economic entities;
- 4) *in case of the check-ups on the arrangement of food for children in kindergartens and schools;*

5) in the cases of public safety, protection of the rights of persons, life and health protection, state defense and security provision (with corresponding substantiations) only with the written consent of the Prime Minister of the Republic of Armenia;

6) among the entities included in the annual inspection plan and in the high risk group according to the checklists of inspections of departments approved by the Appendix of this Decree.

Meanwhile, according to Article 4 of the Law “On Public Management System Bodies” of the Republic of Armenia, the Health Inspection Body of the Ministry of Health of the Republic of Armenia has been reorganized to the Health and Labor Inspection Body⁶⁶, which pursuant to law, carries out on the territory of the Republic of Armenia, , the sanitary and hygienic and anti-epidemic control of sanitary-epidemiological security of the population of the Republic of Armenia including supervision over the observance by the economic entities the requirements of the legislation of the Republic of Armenia on sanitary-epidemiological security of the population (except for the requirements of the legislation in the fields of food and non-food products safety) and sanitary-epidemic preventive measures as well as the competence of the inspection body is to give an order to suspend the activities of educational institutions, health care and culture facilities in cases and in the manner prescribed by law in the result of fixing violations that are of considerable danger for human life and health, until the elimination of the recorded violations of sanitary norms and rules, hygienic standards and anti-epidemic regulations.

In accordance to Part 1.1. of Article 3 of the Law “On Organizing and Carrying out Inspections in the Republic of Armenia”, all the inspections, except for the State Commission for the Protection of Economic Competition of the Republic of Armenia, as well as works in the direction of implementation of the State Budget of the Republic of Armenia, including control of accuracy and legitimacy of the government procurement (procurement process), *are carried out exclusively on the basis of checklists which are confirmed by the Government of the Republic of Armenia*. Meanwhile, the study of the legislative regulations of the sphere allows to conclude that the corresponding checklists have not been confirmed yet.

It should be underlined that Decree No 349-N of the Government of RA on approval of checklists of risk-based inspections carried out by the State Health Inspection of the staff of the Ministry of Health of the Republic of Armenia adopted in 2013 is still in force. But, nevertheless, the new checklist for inspections by the new Inspection Body is not approved.

Moreover, according to Part 2.1. of Article 7 of the Law “On Organizing and Carrying out Inspections in the Republic of Armenia”, the report on check-ups and studies carried out by the latter during the previous year where it should be mentioned the name of each economic entity inspected

⁶⁶ Decree N 755-L of June 11, 2017 of the Prime Minister of RA “On Approval of the Statute of the Health and Labor Inspection Body of the Republic of Armenia”

<https://www.arlis.am/DocumentView.aspx?docid=123789>

and (or) studied in the accounting period, state registration number, taxpayer identification number (if available), information on the number and basis of inspections and studies carried out at each economic entity is mandatory to be placed, on the Internet website of the body implementing the inspection till January 20 of each year. There is a systemic problem here, as well. In the result of reorganization of the inspection bodies, the newly formed Health and Labor Inspection body, does not have an Internet website yet as of January 30, 2019, as a result of which the data on check-ups are not available for the public.

As a result, the abovementioned allows to record that the problem is not solved in terms of the system as there are lacking the necessary organizational structures and procedures for the supervision over the implementation of sanitary rules and norms for the schools and pre-schools.

Based on the above and the condition that the disaggregated statistics on different criteria are necessary both to get to know the full picture of the sphere as well as exposure of the problems and the issues subjected to solution:

- 1. It is necessary that the Ministry of Education and Science of RA, the Ministry of Territorial Administration and Development of RA and the Yerevan Municipality collect differentiated water and sanitation accessibility statistics based on different criteria;***
- 2. It is necessary to add information on water and sanitation accessibility and availability in each school in "School Electronic Passport Map" section available on the website of the "National Center for Educational Technologies" SNCO "www.emis.am";***
- 3. It is necessary to make information on preschools accessible on the website "www.emis.am" of the "National Center for Educational Technologies" SNCO.***

Moreover, the shortage of the comprehensive study and the unified as well as segregated (e.g. by regions, rural communities, school sizes) statistical data of the sphere collected by the state allows to assume that it is necessary to carry out the study of all the existing problems and outline the reasons for their occurrence in the sphere. Moreover, a number of legal acts regulating the sphere have been adopted and/or amended in recent years, for example, in 2014 and 2017, and refer to newly constructed or reconstructed institutions. As a result, there is a significant difference between the levels of accessibility of water and sanitation in newly constructed institutions and those constructed before the adoption of these norms. The mentioned situation is naturally impermissible, as the health protection of the child should be ensured at the same levels and be based on the principle of the best interest of the child. Therefore, it is also necessary to carry out a special assessment of those institutions that were constructed before the amendment of the norms.

The plan of actions is necessary in order to outline the time-schedule of the solution of the problems and the priorities in the field. The plan of actions will ensure to undertake continuous and unified steps.

The abovementioned factors will also allow to elaborate a plan of actions directed to the level increase of the accessibility of water and sanitation in the institutions, which in its turn will ensure the health protection of the children and contribute to the implementation of the right of education of the children.

Based on the abovementioned, it is necessary:

- 1. To make a system study of compliance with the current norms in all the institutions (including those constructed before the amendment of the corresponding norms and reconstructed);*
- 2. To elaborate a national plan of actions that will be approved by the Government Decree and which will envisage measures to comply all the institutions with the current norms according to the clear time-schedule;*
- 3. To include also other measures in the national plan of actions directed to increase the accessibility of water and sanitation in the educational institutions.*

It is necessary to introduce a special mechanism that will carry out periodic and permanent monitoring, outlining the necessity of appropriate actions in the institutions in case of each amendment of the norm.

In the result of monitoring it also turned out that the problem of non-provision of the domestic legislation requirements in the preschools is not only the insufficiency of the allotted financial means, but is also the result of the shortage of awareness of the sanitary rules defined by the domestic legislation for the preschools. Particularly, in the result of the queries carried out in the institutions it has been recorded that the staff of the institutions are not properly informed about the structure of the children preschool facilities, the normative provisions on ensuring property and equipment and the possible negative consequences in the result of their non-application.

Taking into account the role of personal hygiene in the health protection of the children, the notification of the personal hygiene rules is of substantial significance.

Thus, in the result of studies carried out in the schools and the talks with the staff, it has been recorded that there is an insufficient awareness of personal hygiene rules among the pupils. In particular, in response to the questions introduced to the staff, the latter mentioned that the existing shortcomings took place because of the pupils. For example, the employees of the institutions reported that the pupils waste or spoil toilet papers or soaps in the toilets.

First of all, the training of the pupils on the medical and hygienic knowledge and healthy lifestyle is extremely significant for observing the personal hygiene rules at schools. At that, it should be carried out regularly, and, if necessary, through personal talks, as well. During such meetings, the rules of personal hygiene and the consequences of possible negative impact should be explained to the pupils in a clear way. Such awareness measures will help the children to observe the sanitary and hygienic norms, avoid unhealthy habits and display daily care for their health.

It should be also mentioned that, in the result of studies carried out in the institutions, it has been recorded that the staff of the institution is not properly informed about the hygienic requirements presented to the structure, facilities, property and equipment of the exploiting institutions and the possible negative consequences in case of their non-application.

Based on the abovementioned, it is necessary:

- 1. To carry out awareness raising works among the pupils of the educational institutions and their parents on water and sanitation, hygiene rules through mass media, social networks, as well as educational systems;*
- 2. To take steps in the direction of raising awareness on the legislative requirements among the personnel of the institutions;*
- 3. To place informative and comprehensible posters on sanitation and hygiene for children in the institutions.*

2.5 SCHOOLS FINANCING AS A BASES OF IMPLEMENTATION OF WATER AND SANITATION RIGHT

Article 22 of Law “On General Education” of RA defines the protection of health of the learners as a principle of general education. According to the mentioned Article, the school ensures safe and secure conditions for the implementation of the education program, normal operation mode, medical aid and service, necessary conditions for the physical development and health promotion of learners, forms skills of personal hygiene and healthy lifestyle according to the procedure prescribed by the Order of the public health authorized body.

According to Article 35 of the same law, the financial means of the school are formed from the state budget and other legal sources. By the way, children with special educational needs who have medium, severe and complete disorders of voice and speech, audio-oral, intellectual (mental), locomotor functions avail of the increased amount of funding from the additional state support for the education arrangement. The set raised scale of funding for the children with needs of special educational conditions is defined by the Government of the Republic of Armenia according to the severity of the need of the child.

The kindergartens and schools in the Republic of Armenia are financed through public funds through the Ministry of Finance of the Republic of Armenia. Thus, the financing of educational institutions is implemented by the procedure prescribed by Decree No 1262-N⁶⁷ of August 24, 2006 of the Government of RA “On Estimation of Expenditures of the State Schools of the Republic of

⁶⁷ Adopted on August 24, 2006, valid from January 1, 2007

Armenia, Approval of Procedure of Reallocation of Expenditures in State Schools and Repeal of Decree No 773 of August 25, 2001 of the Government of the Republic of Armenia”.

According to Point 1 of the abovementioned decree, the financing of all the state schools of the Republic of Armenia is carried out according to the number of the learners: the number of the learners is multiplied by a certain amount defined by the government each year, and the minimum amount of expenditures envisaged also for the maintenance of the institution.

Namely, according to the applicable financing procedure, the amount of funding for the school is directly proportional to the number of pupils studying there.

The Appendix of the mentioned decree of the Government defines the procedure of reallocation of expenditures of the state schools of the Republic of Armenia. According to Point 1 of the abovementioned order, the Minister of Education and Science of the Republic of Armenia, the Heads of the Regional Administrations of the Republic of Armenia (the Mayor of Yerevan), within one month after the adoption of the decree of the Government of the Republic of Armenia on the measures ensuring the implementation of annual state budget of the Republic of Armenia, make reallocations in the expenditures of the state schools.

According to Point 2 of the same Order, reallocations may be carried out in the part of those state schools of the Republic of Armenia, in which expenditure per pupil has increased more or less than is the overall average increase per pupil of the state schools subordinated to this authority, as compared with last year, as a result of the application of the financing formula according to the number of the pupils.

Meanwhile, as you can see the implementation of reallocation is a discretion of the state body, which is conditioned by the overall average increase in expenditures per learner of the state school subordinated to this authority (e.g. to a particular Regional Administration) as a result of the formula applied in a particular school. This cannot create sufficient levers for equalizing the financing of the state schools of different regions.

The Ministry of Territorial Administration and Development of RA referred just to the mentioned problem by the implementation of the analyzes of the financial activities of schools under the regional subordination of RA, as a result of which it is recorded that the financing of schools with a small number of pupils (up to 100 pupils), according to the formula, was not sufficient for the school maintenance expenditures and salary fund financing, in the result of which the size of the budget reallocation implemented by regional administrations is great.⁶⁸

By the joint Order⁶⁹ of January 11, 2017 of the Minister of Education and Science and the Minister of Finance of RA the indexes of the pupils financing formula for 2018 according to the number of pupils was approved in the following amounts:

⁶⁸ Available at <http://www.mtad.am/files/docs/1627.pdf> page 39

⁶⁹ Adopted on 27.12.2017, valid from 11.02.2018

$$Ta = Ln \times La + Ma + ELn \times WDn \times FEa + GEILn \times 0.1 \times SVba$$

LA - the annual amount per learner is 124000 AMD

Ma - the minimum amount of the institution maintenance expenditures for the state schools with up to 100 pupils is 19000.0 thousand AMD (including the annual salary fund of the non-teaching staff). The minimum amount of the institution maintenance expenditures for the state schools with 101 to 300 pupils and 301 and more pupils consists of two parts: institution maintenance expenditures - 2844.0 thousand AMD, and non-teaching staff annual salary fund which is calculated based on Point 2 of this Order on the minimum number of non-teaching personnel.

According to Point 2 of the order, indexes for the elementary, middle and senior levels of the school are applied, the annual amount per learner multiplying by 0.8097 index for the elementary level, by 1.1255 index for the middle level, by 1.166 index for the senior level. Meanwhile, additional indexes are applied for higher mountainous, mountainous locations schools and the single school with up to 400 pupils in the same location, as well as for the senior high schools, the annual amount per learner multiplying by 1.13 index for the higher mountainous location schools, for mountainous location schools by 1.04 index, for the single school in the same location with up to 400 pupils by 1.2 index and for the senior high schools by 1.14 index. Proceeding from the number of pupils, the minimum number of the non-teaching personnel staff is up to 7.5 for schools with up to 100 pupils, 9.5 for schools with 101 to 300 pupils, 13.0 for schools with 301 and more pupils.

According to Point 3 of the Order, the average annual number of pupils is accepted as a number of learners (Ln), which is subject to clarification at the beginning of the academic year, taking into account the actual complement of the classes, ELn is the average annual number of elementary school learners and preschool children, which is subject to clarification at the beginning of the academic year, GEILn is the number of learners of general educational institutions (except elementary classes and the 5-12 classes of the boundary communities) at the beginning of the academic year.

Hence, it can be inferred, the number of pupils studying at school is key variable of the school financing formula. The current formula does not ensure an appropriate financing for the minimum requirements of small, incomplete schools. Based on this decree, the Minister of Finance and the Minister of Education and Science of RA sign a joint Order on the index of the financing formula yearly.

Currently, a new financing formula is under consideration, according to which it is suggested to envisage a new variable, that is the number of classes in the schools financing formula. It is also envisaged to eliminate the possibility of reallocation of the amounts and establish the minimum salary of the teacher.⁷⁰

⁷⁰ See, the Report on the Results of the Schools Financial Activities Monitoring, 2017. Available at: <https://transparency.am/files/publications/1510654258-0-538483.pdf>, Analysis of Financial Activities of Schools under the Regional Subordination of RA carried out by the Ministry of Territorial Administration and Development of RA, available at <http://www.mtad.am/files/docs/1627.pdf> p.p. 39-40.

Currently the Government of RA envisages to amend the mentioned decree.

It is also worth mentioning that in the current legislation there is missing the minimum amount foreseen for the annual budget expenditures for schools: economic property, cleaning products, sanitary property for schools. The decrees of the Government of RA regulating the financing of schools do not disclose the principle of the SWE formation as well as do not specify the minimum amount allotted for water, sanitary products and services. As a result, it gives the school principals an opportunity not to direct sufficient amounts to the obtaining of sanitary property and means while drawing up the school budget.

Referring to the financial security issue, it should be mentioned that, according to the Ministry of Education and Science, there is no imperative decision or elaborated strategy for directing, in a varying degree, assignments allotted to the financing of the institutions, particularly, to water and sanitation accessibility sphere, however, according to data provided by the Ministry, from 0,4 to 2 percent (except particular cases) of the budget allotted to the institutions is directed to water and sanitation accessibility in the institutions.

The Ministry of Territorial Administration and Development of RA referred also to this issue upon the request, presenting a number of data. In particular, about the 0.3% of the budget allotted to the institutions subordinated to the Shirak Regional Administration is directed to the water and sanitation accessibility in the institutions. 0.5-1% of the budget allotted to preschools subordinated to the Armavir Regional Administration was submitted to water and sanitation sphere, and from the school budgets - 0.2% to 0.3%. In case of schools subordinated to the Lori region, the allotment made up to 3% of the budget, and in case of preschools it made 0.43% on the average of the budget allotted to the preschools of urban communities and 3.4% on the average of the budget allotted to preschools in rural communities is directed to water and sanitation accessibility sphere. In case of the Kotayk region, the assignment allotted to water and sanitation makes from 0.005 to 2% of the budget, in case of the Shirak region it makes 0.3% of the budget and in case of the Tavush region it makes 17.9%. In case of the Vayots Dzor and the Aragatsotn regions, not a single percent of the budget allotted to the institutions is directed to water and sanitation accessibility in the institutions.

It should be mentioned that, according to the data provided by the Ministry of Territorial Administration and Development of RA, a number of schools functioning under the regional subordination have development programs in which there is reference mainly to the issue of water, sewerage and sanitation. Despite of the abovementioned, that schools often have development programs including water, sewerage and sanitation issues, the analysis of the presented data in the previous paragraph gives an opportunity to state that a concrete proportion of financing means for water and sanitation from the budget allotted to school is not specified, which, naturally, will hinder the activities and steps directed to the improvement of water and sanitation accessibility. The

situation is the same in the schools subordinated to the Ministry of Education and Science, 49 of which have a development program, and in 45 there is a reference to the issue of water and sanitation, but in this case, as well, there is no imperative decision or elaborated strategy concretely directed to water and sanitation accessibility.

The Yerevan Municipality also has provided similar information, according to which there is no imperative decision or elaborated strategy for directing, in a varying degree, assignments allotted for the financing of the institutions subordinated to the Municipality, particularly, to water and sanitation accessibility sphere.

We suggest to elaborate a strategy concretely mentioning the amount of the financing means which should be mandatory directed to water and sanitation accessibility giving significance to the implementation of the right of water and sanitation accessibility, proceeding from the abovementioned.

Therefore, it is necessary to envisage a minimum amount in the SWE to purchase hygiene means at schools. A similar approach is also necessary to adopt in the funding of pre-schools.

CHAPTER 3

RESULTS OF STUDIES IMPLEMENTED IN SCHOOLS

The study was carried out in 121 schools of all the regions of Armenia and Yerevan, out of which 81 were urban and 40 rural schools.

Table 1
Percentage Ratio of
Urban and Rural Schools

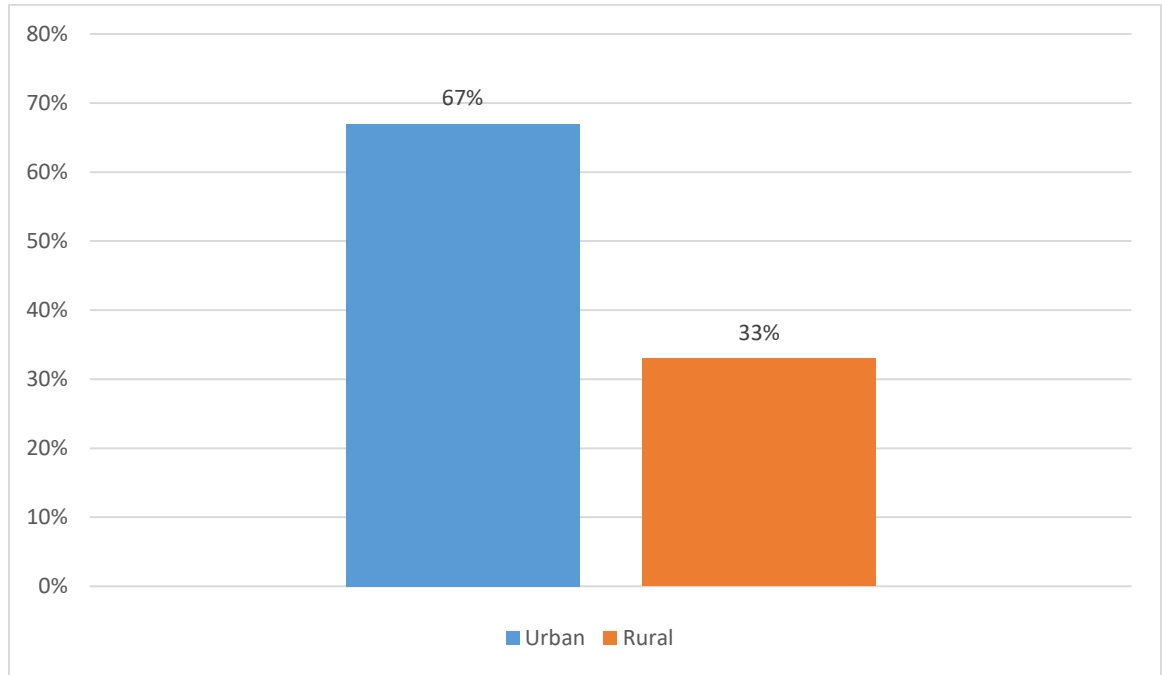
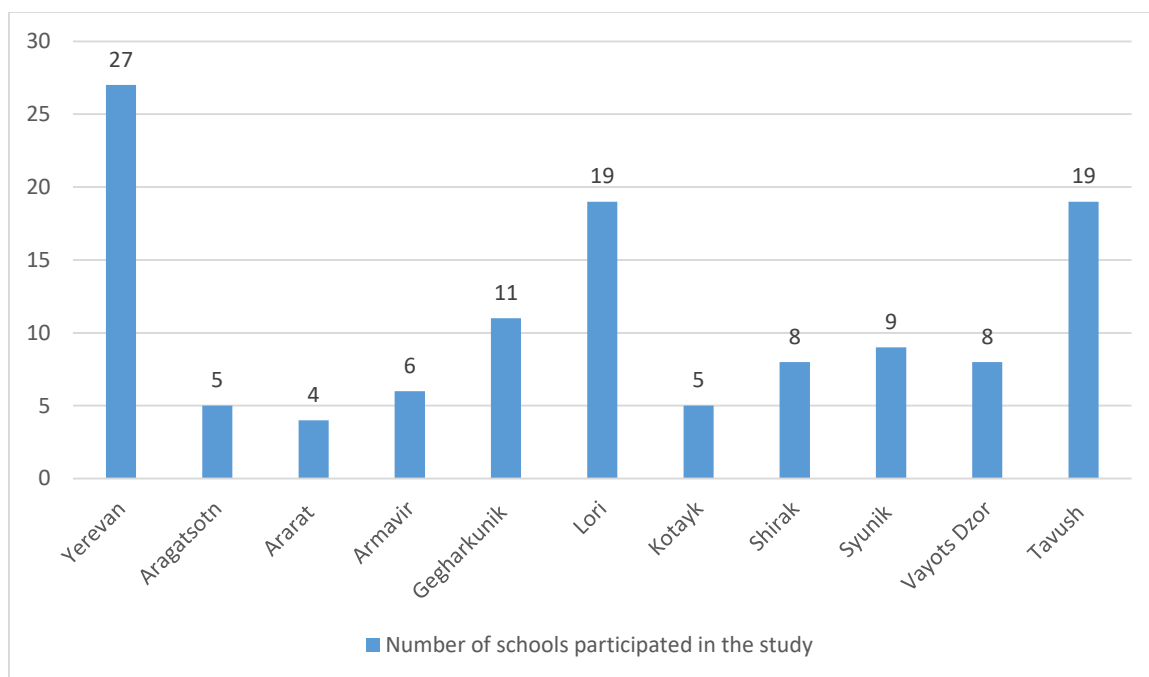


Table 2
Distribution of the 121 Monitored Schools
by the Regions of RA and Yerevan



3.1 WATER SUPPLY

The provision of the school buildings with twenty-four-hour drinking service running water is a mandatory requirement of the sanitary rules and norms introduced to the organizations implementing general education programs in the Republic of Armenia. However, 105 out of 123 studied schools are ensured with twenty-four-hour drinking service running water. The percentage ratio of the urban and rural communities by the mentioned index as well as prevalence and distribution by the regions of RA is presented in Table 3.

Table 3
Percentage Ratio of Provision of the
Monitored School Buildings of Urban and Rural Communities
with Twenty-four-hour
Drinking Service Running Water

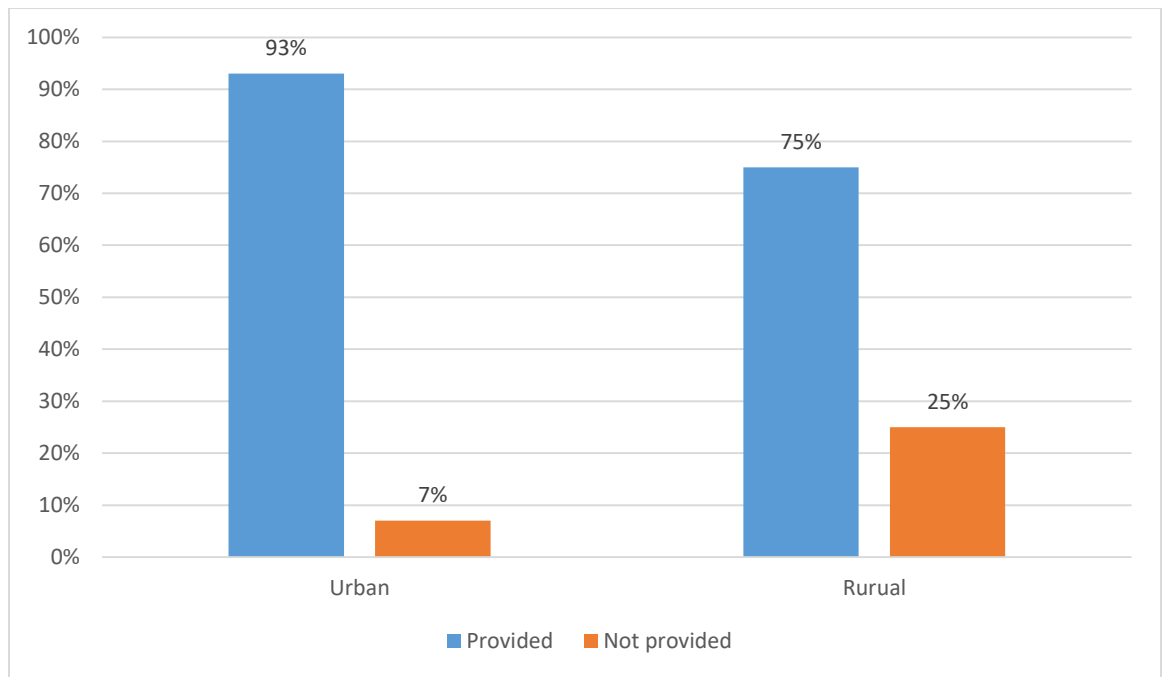
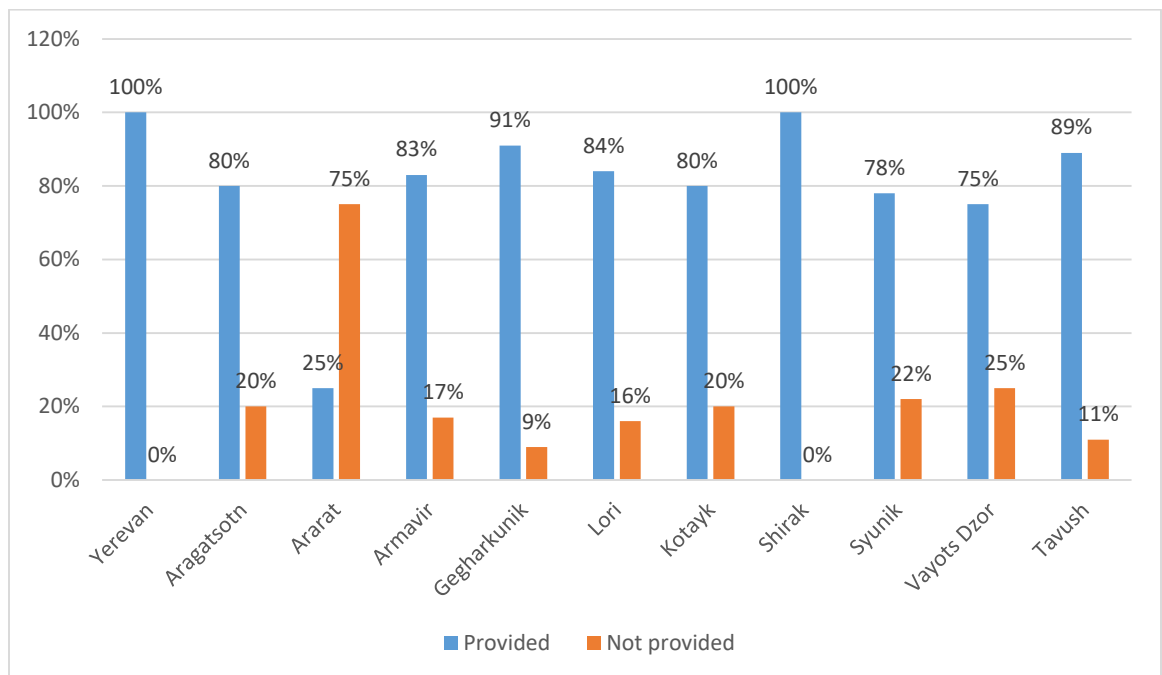


Table 4
Percentage Ratio of Provision of the Monitored School Buildings with Twenty-four-hour Drinking Service Running Water by the Regions of RA and Yerevan

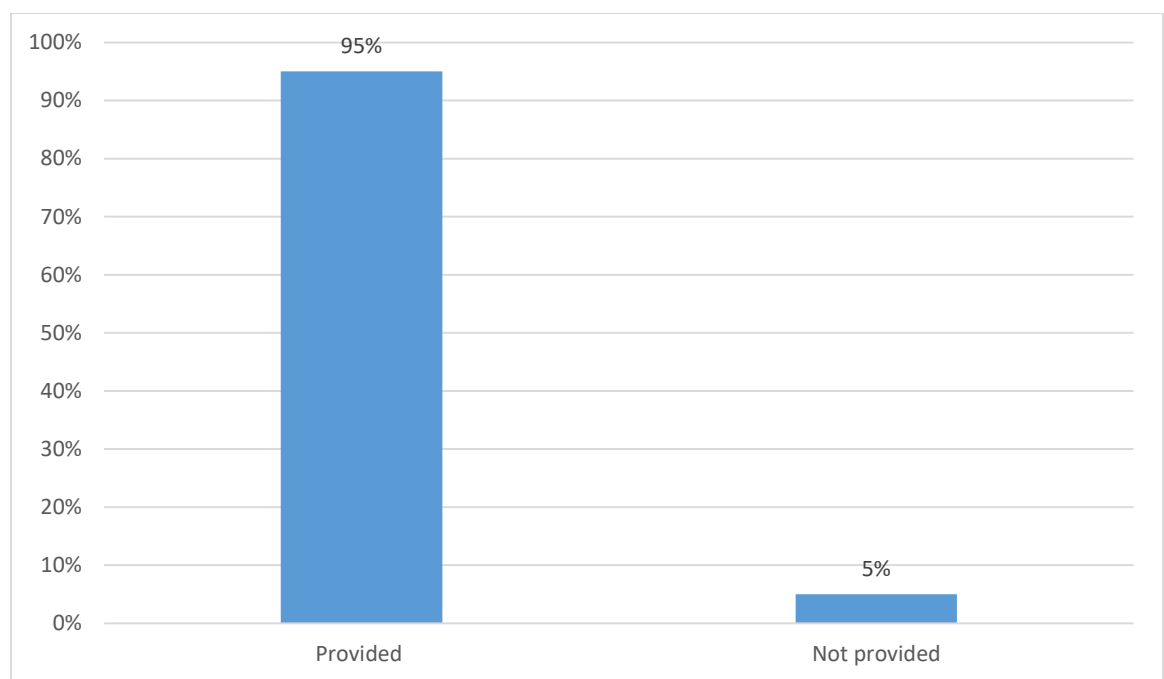


In this case, Ararat region stands out, where the 75% of the schools are not provided with twenty-four-hour water supply, and the number of schools not having twenty-four-hour water supply is 20-25% in Aragatsotn, Kotayk, Syunik and Vayots Dzor regions.

3.2 DRAINAGE SYSTEM. INTERNAL NET

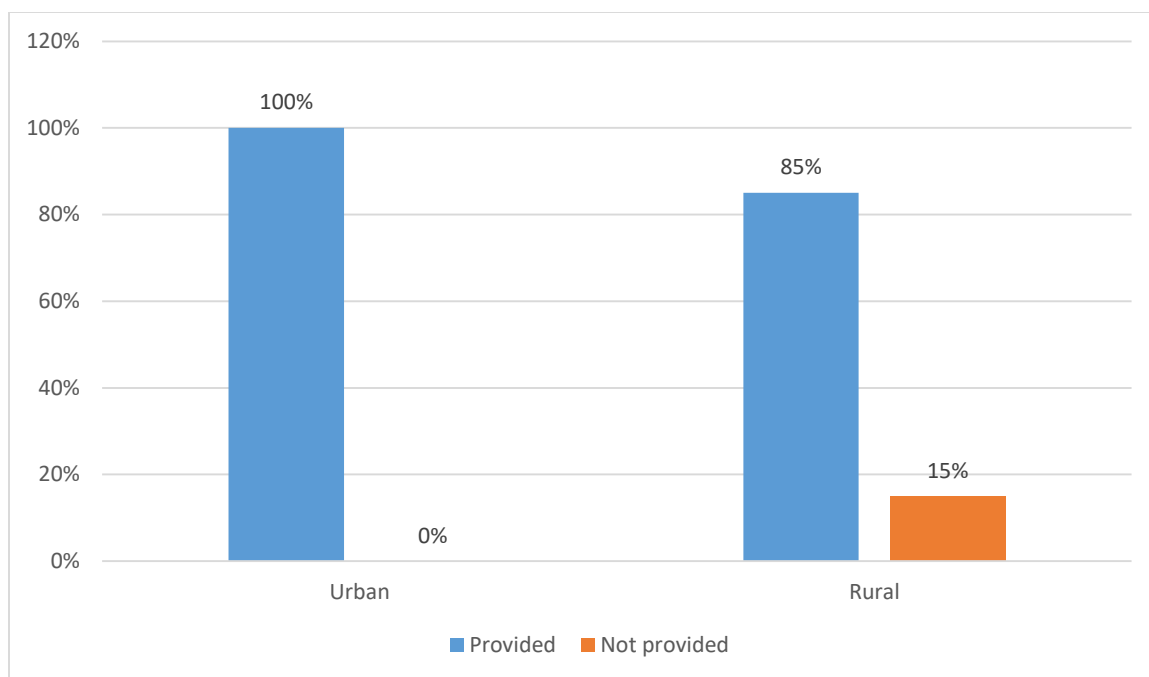
The provision with internal drainage system of the organizations is a mandatory requirement of sanitary rules and norms. 6 of the monitored schools are not provided with an internal drainage system, which is the 5% of the studied schools (see Table 5).

Table 5
Percentage Ratio of Provision of the Monitored School Buildings with Drainage System



The study shows that exclusively the rural schools are not provided with internal drainage system, the percentage ratio of which is 15%: 6 schools of 4 regions (see Table 6).

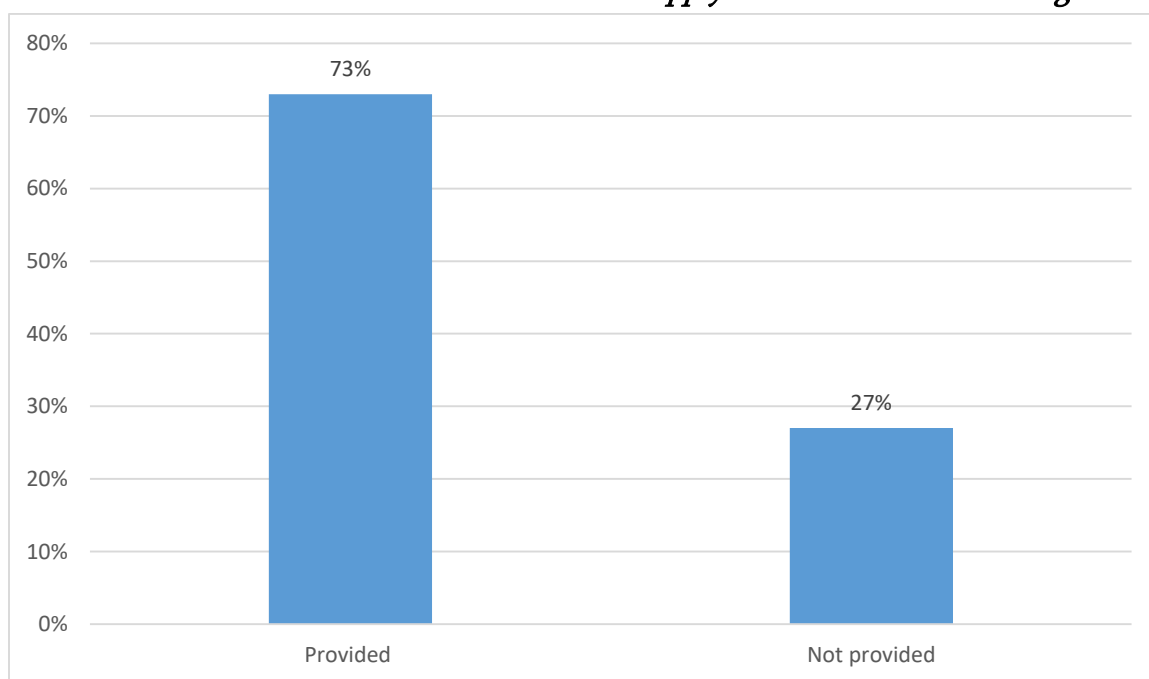
Table 6
Percentage Ratio of Provision of the Urban and Rural Monitored School Buildings with Drainage System



The provision with permanent running water of the toilets of the buildings of the organization is a mandatory requirement, even in case of intermittent water supply (storage container). 15 out of the monitored schools have a scheduled water supply, of which only the toilets of the 11 are provided with permanent running water (see Table 7).

Table 7

Percentage Ratio of Provision of the Toilets Equipment of 15 School Buildings Having Scheduled Water Supply with Permanent Running Water

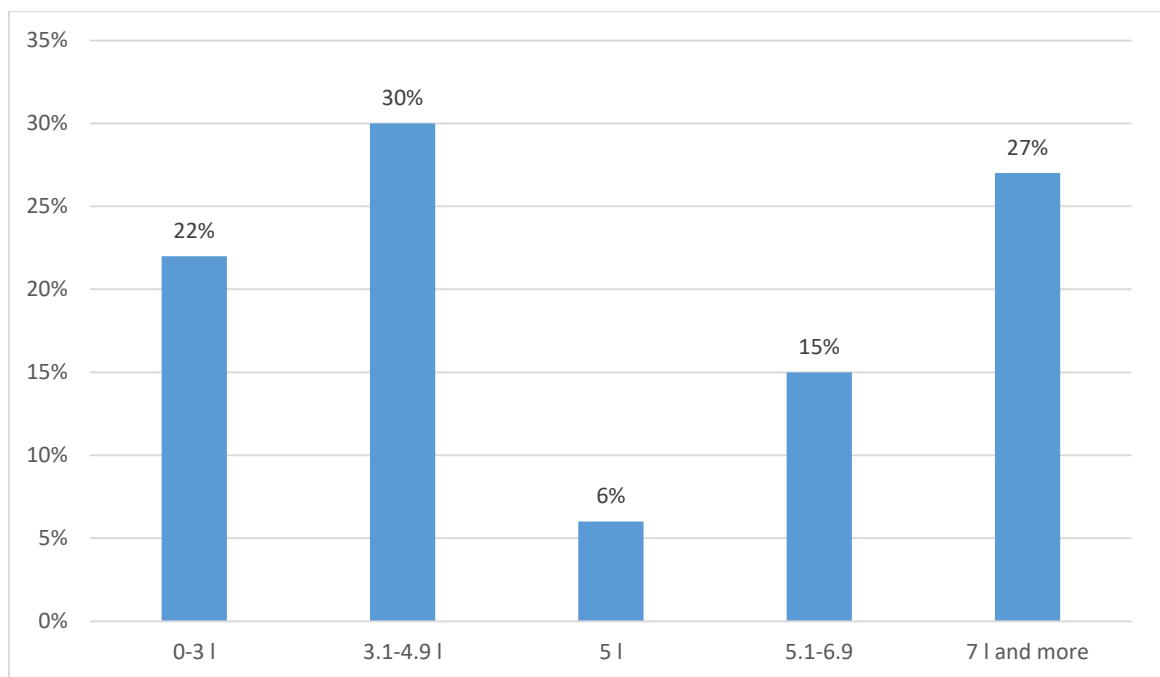


3.3. DRINKING WATER AMOUNT

According to the World Health Organization (WHO) requirements, 5 liters of drinking water is foreseen per person in schools, and additional 1.5 -3 liters of water per day (2 liters are chosen for the calculation) in the case of Asian-type toilet bowls and toilets with running water. This indicator was calculated in 97 out of the 121 monitored schools (80%). The indicator was impossible to calculate in the remaining 24 institutions (20%) due to the lack of water meters. According to the received results, the amount of water accessibility per person is less than 5 liters in 50 schools out of 97 (51%), and less than 7 liters in 57 schools (58%).

Table 8

Percentage Ratio of Water Amount Falling to Per Person Share in 97 Schools Provided with a Water Meter



The analysis of the percentage ratio of water amount falling to per person share in separate regional schools shows that the volume of water falling per person share is lower not only than 7, but also than 5 liters in all the monitored schools in Aragatsotn and Ararat regions. The requirement of accessibility of 7 liters of water per person is not ensured even in the 67% of the schools visited in Yerevan. The situation is comparatively better in Syunik and Gegharkunik regions, where 72% and 60% of the studied schools are provided with 7 liters of water accordingly (see Tables 9, 10, 11).

Table 9

Percentage Ratio of Water Amount Falling to Per Person Share in the 97 Monitored Schools by the Regions of RA and Yerevan

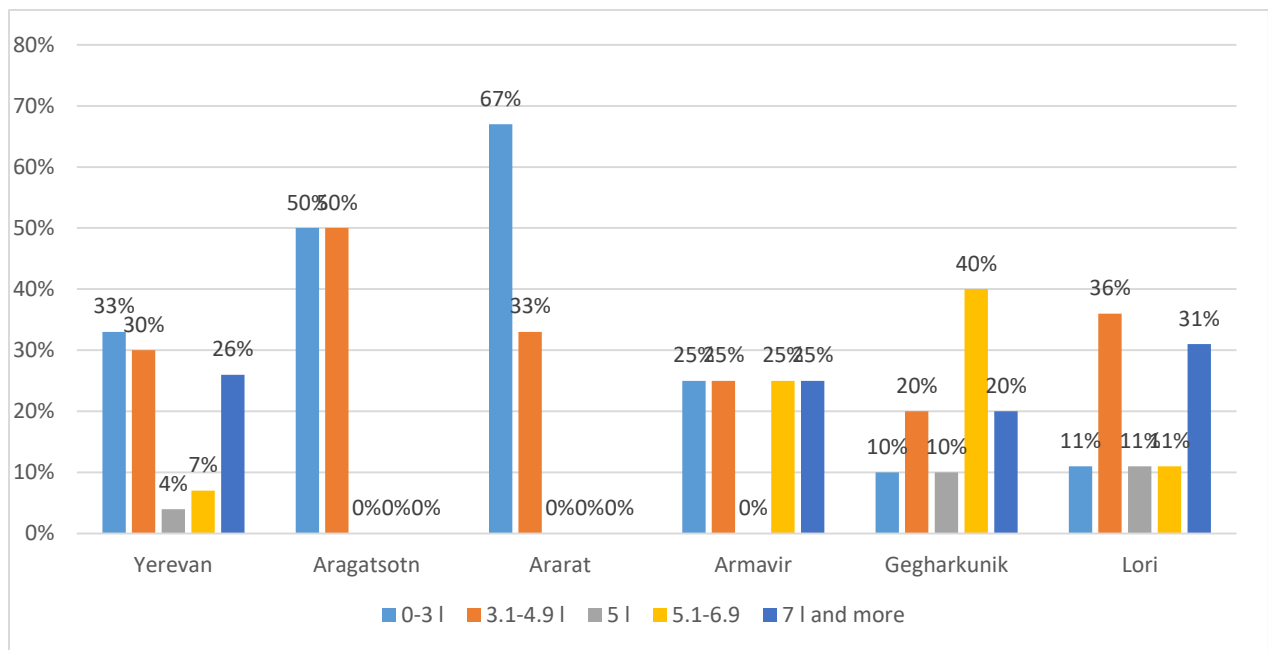
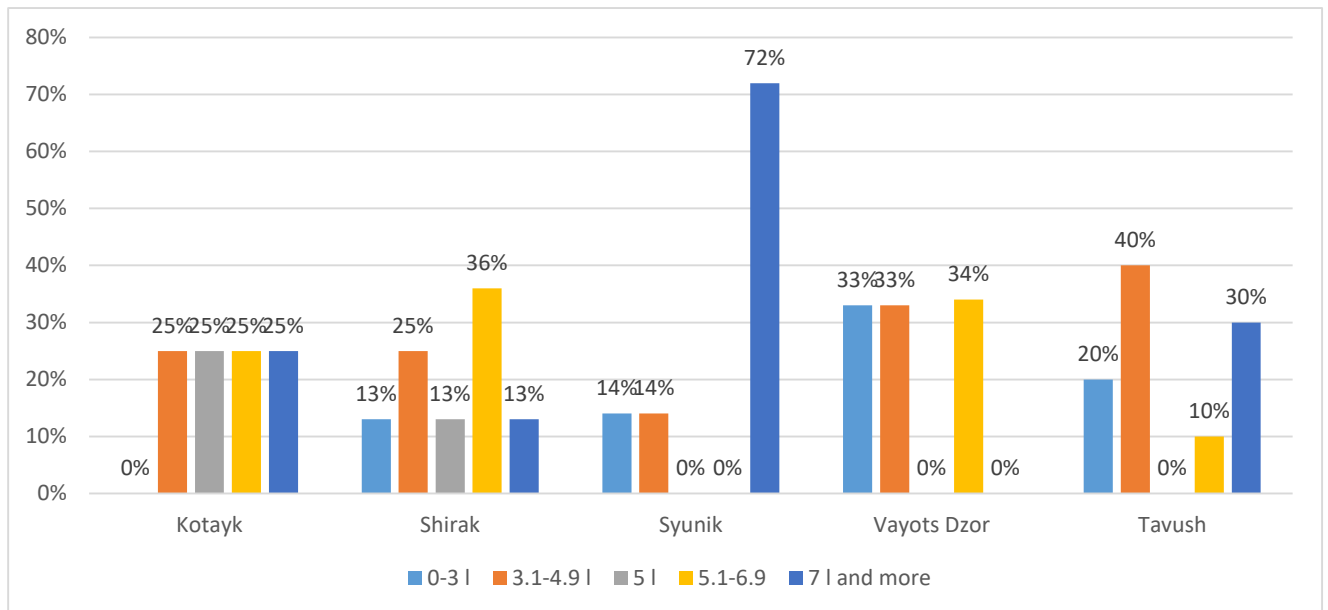
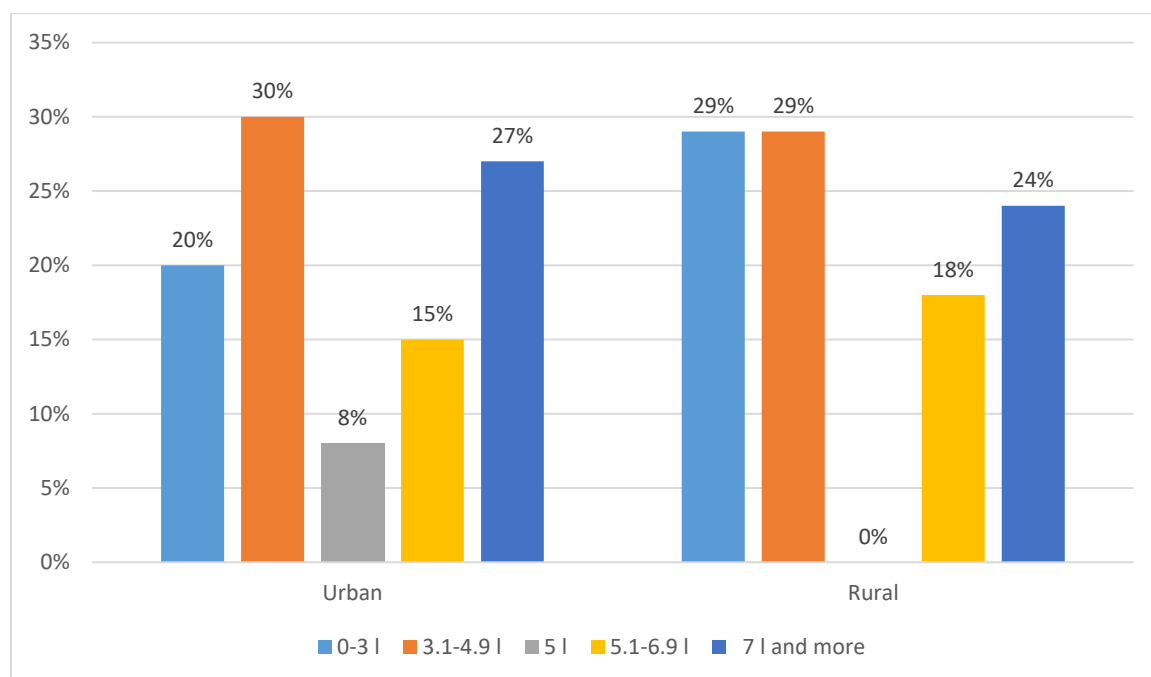


Table 10
Percentage Ratio of Water Amount Falling to Per Person
Share in the 97 Monitored Schools by the Regions of RA and Yerevan



Nevertheless, the percentage ratio by water amount falling to per person share in the urban and rural schools is the same: 5 liters or more - 42%, 7 liters and more - 24% and 27%.

Table 11
Percentage Ratio of Water Amount Falling to Per Person Share in the Urban and Rural Schools



3.4. ACCESSIBILITY OF DRINKING WATER

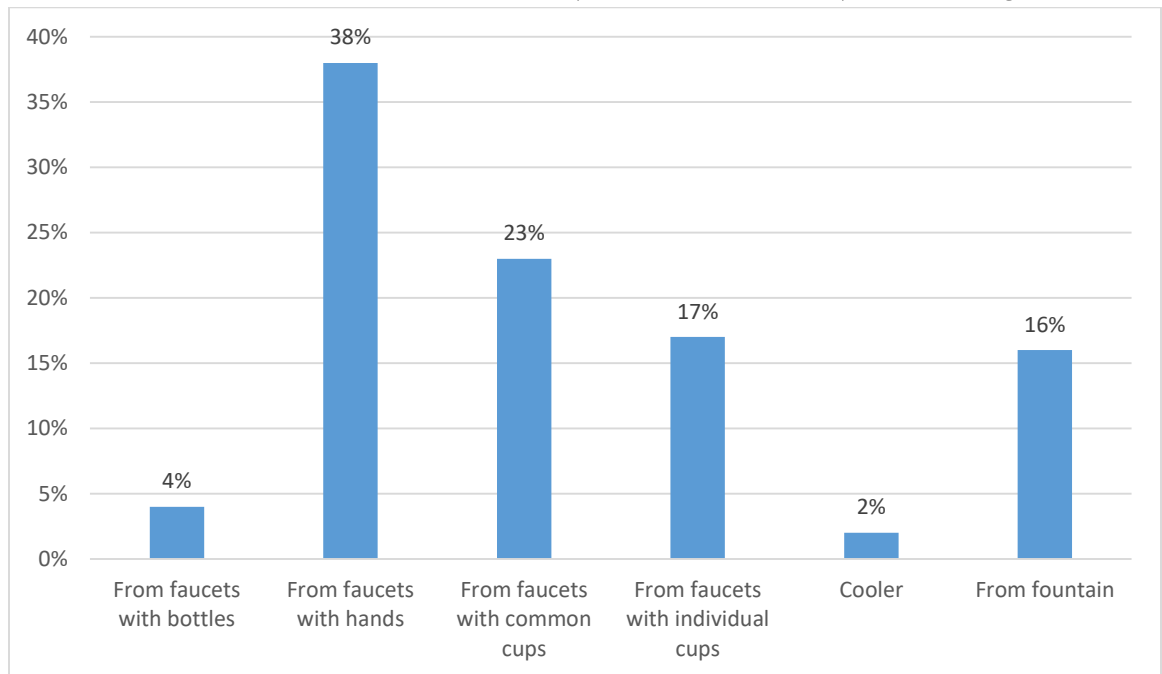
The accessibility of drinking water among the schoolchildren is also of great significance conditioned with the different ways of drinking water use. It is of great significance in terms of infection detection and risk management among the children.

In the result of the queries it turned out that in schools, the pupils drink water mainly from faucets with hands, from faucets with a common cup, from bottles, from faucets with individual cups, coolers, fountain. Most risky are the ways of use from faucets with hands and with common cups, which is recorded in the 61% cases of the monitored schools (see Table 12).

As a result of monitoring, it also turned out that the majority of pupils of 1-4 classes use water in bottles brought from home.

Table 12
Percentage Ratio of the 121 Monitored

Schools by the Children's Way of Drinking the Water



They drink water with hands most commonly in the Vayots Dzor region schools - 88% and in Kotayk region - 80%, and the least in Shirak region - 12%. The mostly used way of drinking water is from common cups in the Shirak region schools - 50%. The pupils of all the studied schools in Armavir region drink water in two more risky ways: from the faucets with hands - 67%, and from faucets with common cups - 33% (see full data in Tables 13 and 14).

Table 13
Percentage Ratio of the 121 Monitored
Schools by the Children's Way of Drinking the Water by
Regions of RA and Yerevan

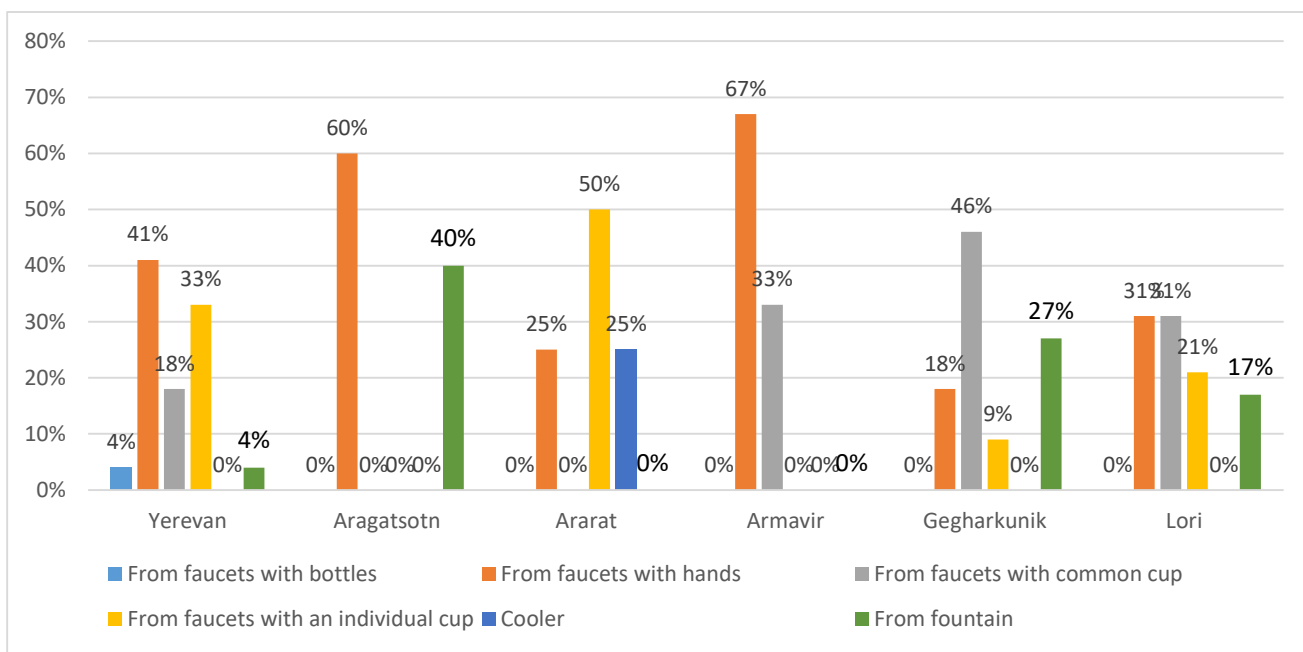
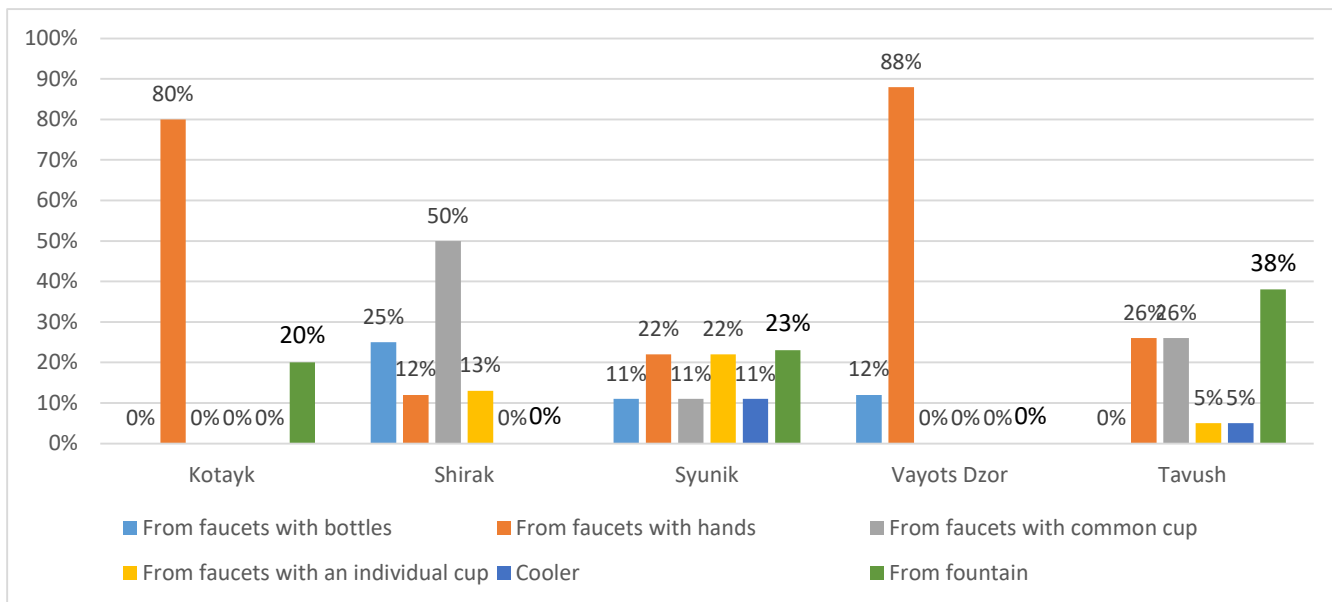
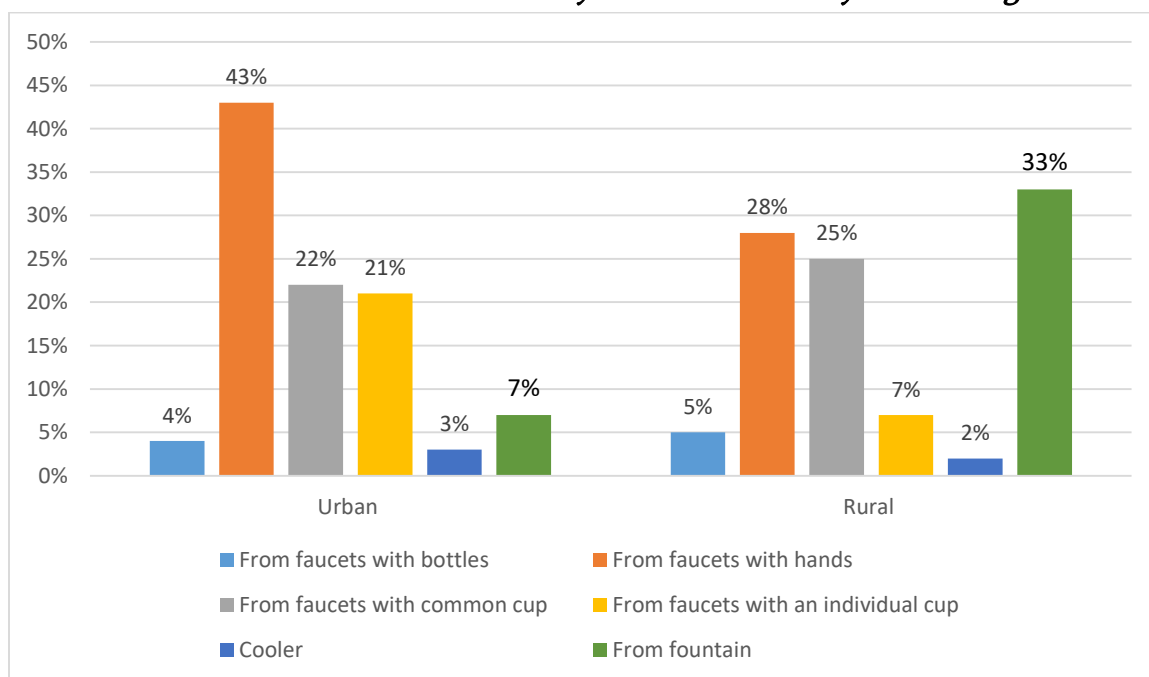


Table 14
Percentage Ratio of the 121 Monitored
Schools by the Children's Way of Drinking the Water by the
Regions of RA and Yerevan



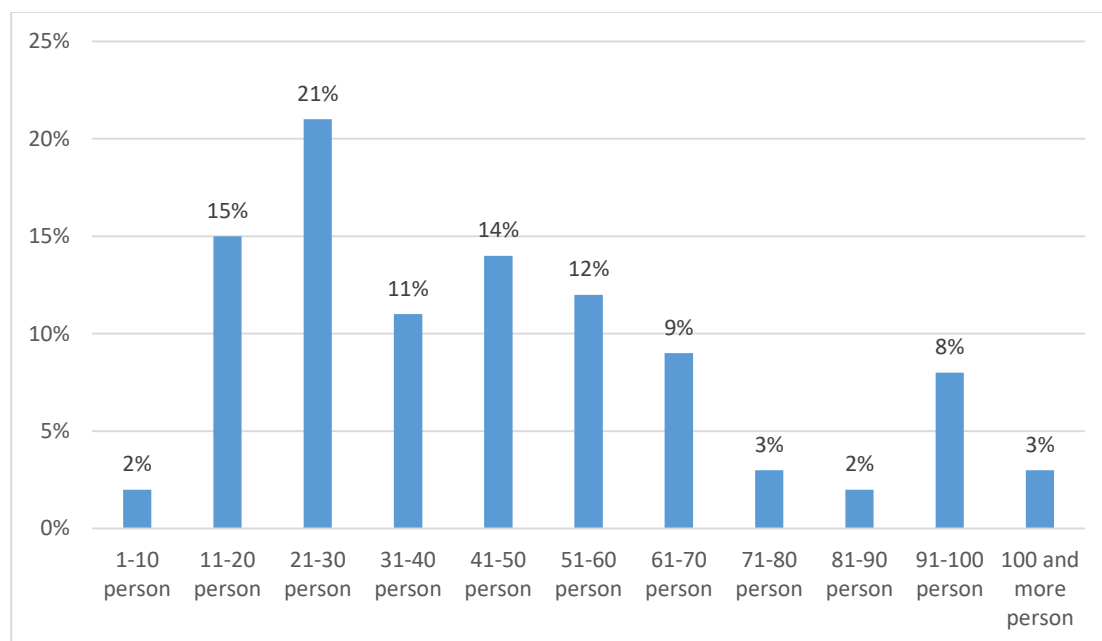
The most common way of drinking water by the children is the way of drinking water from faucets with hands in the urban and rural schools, which is mostly spread in the urban schools - 43% and in the rural schools - 28%. Accordingly, they drink water from fountains in 33% of cases in the urban schools and 7% in the rural schools (see Table 15).

Table 15
Percentage Ratio of the 121 Monitored
Urban and Rural Schools by the Children's Way of Drinking the Water



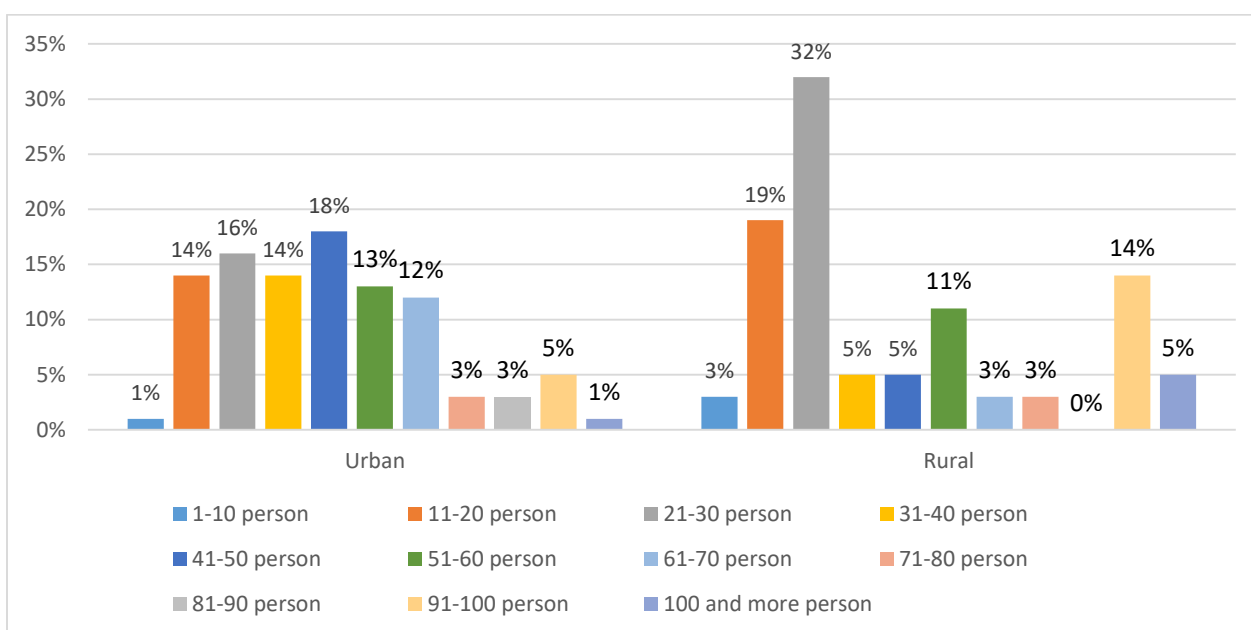
Taking into account the fact that the construction norms define the indicator of “1 faucet for 30 persons” (National Human Rights Institutions’ Roles in Achievement Human Rights-Water Governance, WaterLex, 2015), the indicator is studied during the monitoring, which allows to estimate as how many persons make use of one faucet, which in its turn is significant in terms of the accessibility of drinking water. In the result of the study, it became clear that, 31 and more persons make use of one faucet in the 62% cases of the studied schools (see Table 16).

Table 16
Percentage Ratio of Schools by the Number of
Persons Making Use of One Faucet



31 or more person make use of one faucet in the 69% of the studied urban schools, in case when this indicator is 46% in the rural schools (see Table 17).

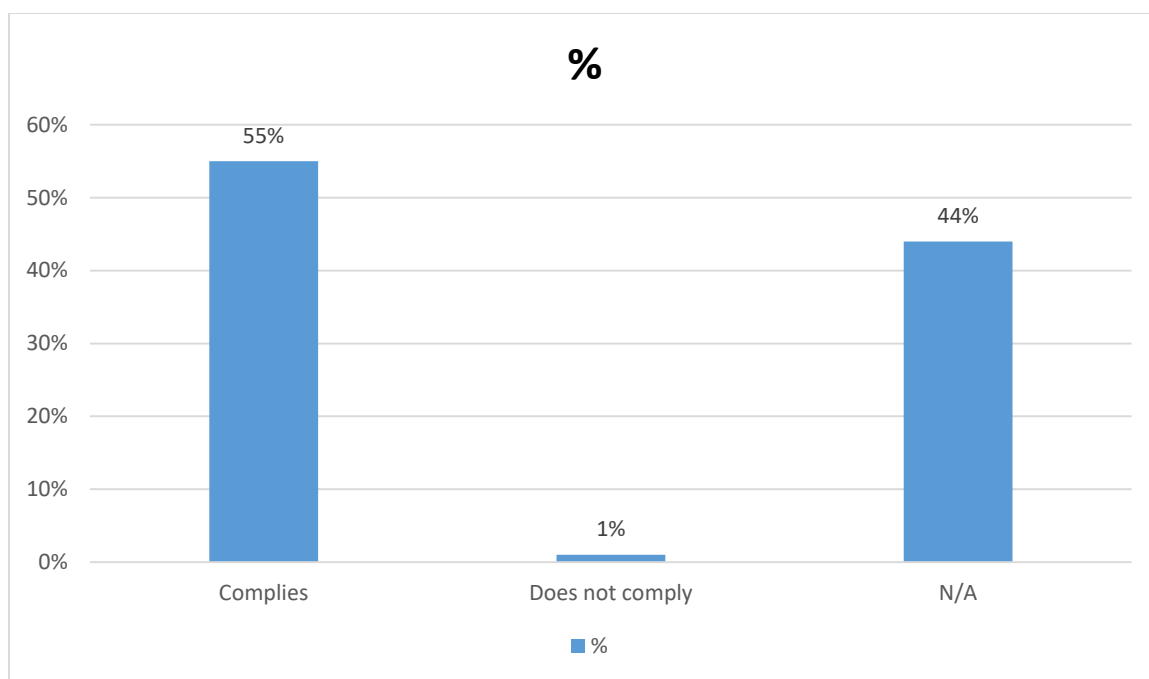
Table 17
Percentage Ratio of the Urban and Rural
Schools by the Number of Persons Making Use of One Faucet



3.4. DRINKING WATER QUALITY

The compliance of the quality of drinking water supplied to the institution with the sanitary rules and norms of RA is a mandatory requirement of sanitary rules and norms submitted to the organizations implementing general education programs in the Republic of Armenia.⁷¹ During the monitoring, this index was also put into the basis of this study through oral enquiries. As a result, it turned out that the quality of drinking water complies with the requirements of the sanitary rules in 67 schools out of the 121 schools participated in the study, and do not comply in one school (Aragatsotn region), there are no data on 53 schools, and the school administrations of 21 out of the 121 monitored schools (17%) made complaints on drinking water quality. The lack of data is conditioned with the fact that not all the schools located in cities are included in the list of drinking water quality control points. Below, the results of the study are presented in the form of a table.

Table 18
Percentage Ratio of the Monitored Schools by the Compliance of the Drinking Water with Sanitary Rules Requirements



At the same time, a query was made on the availability of complaints about the quality of drinking water in the result of which only 21 out of 121 schools made complaints about water quality

⁷¹ Order N 876 of December 25, 2002 of the Minister of Health of RA “On Drinking Water. Hygienic Requirements for Drinking Water Quality of the Centralized Water Supply Systems. On Approval of Quality Control N 2-III-A2-1 Sanitary Norms and Rules”.

(17%) of which 14 were urban schools (14%), and 7 rural (33%). Complaints mainly concerned water sensitivity indicators.

3.6. DRAINAGE SYSTEM. EXTERNAL NET

During the monitoring, the mandatory indicators on drainage system and external net acting by the sanitary rules and norms of RA are studied (provision with internal water supply net and wastewater disposal net, availability of sewerage internal net connected to the drainage external net, internal net connected to the sewage, wastewater storage waterproof pit, the wastewater storage disposal from the waterproof pit by a corresponding specialized organization).

Two out of 121 monitored schools (2%) (Aragatsotn and Syunik regions), are the incomplete institutions having up to 50 learners of the unsewered rural settlements, where there are installed toilets and washbasins with wastewater storage waterproof pit.

113 out of 121 monitored schools (93%) are provided with an internal water supply net, and 8 schools (7%) are not in Ararat, Gegharkunik, Syunik and Tavush regions.

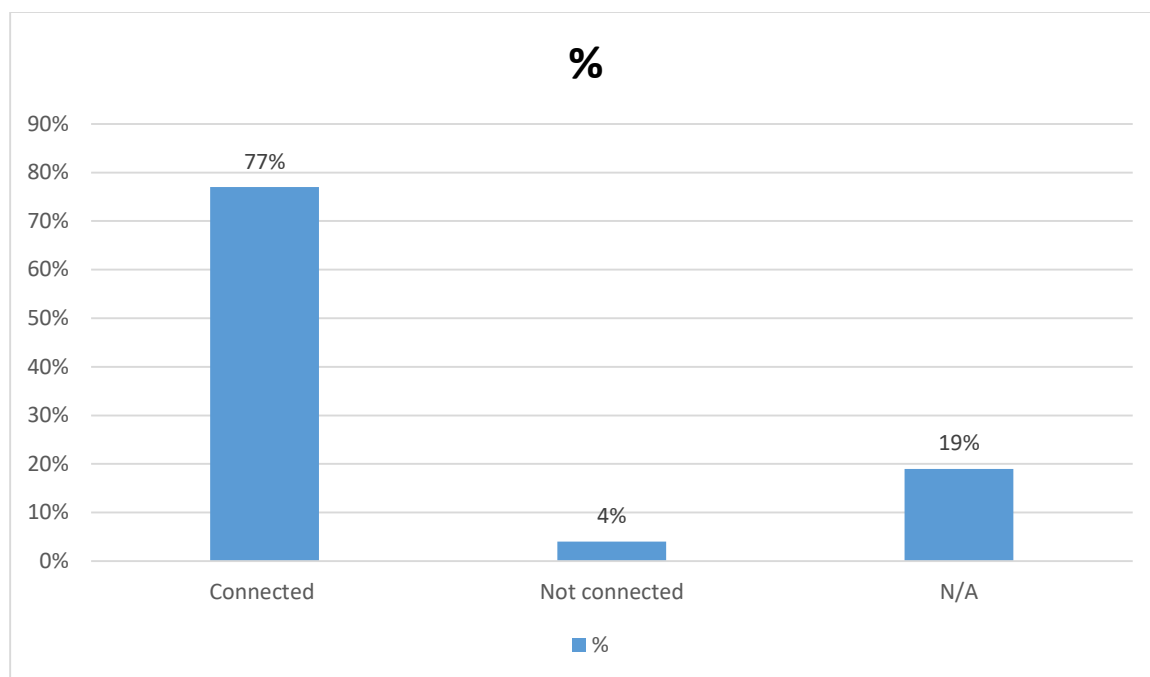
118 out of 121 schools (97%) are provided with the internal wastewater disposal net, 3 schools (2%) are not (Tavush, Shirak, Syunik regions).

The sewage internal net is connected to the drainage external net in 93 out of 121 schools (77%), in 5 (4%) schools it is not (Tavush, Lori, Syunik regions), and there are no data on 23 (19%) schools.

An internal sewerage system connected to the waste storage waterproof pit is installed in 18 out of 21 schools (86%) of the unsewered settlements, and a similar system lacks in the remaining 3 schools (14%) (Shirak and Aragatsotn regions).

The disposal of the wastewater of the 5 (24%) of the 21 monitored schools having a waterproof pit is carried out by a specialized organization, the disposal of wastewater of the 5 is not (24%), and there are no data on 11 schools (52%).

Table 19
***Percentage Ratio of 121 Monitored Schools by the
Connection of the Sewage Internal Net to the External Drainage System***



The water supply internal net is connected to the water supply external net in 104 out of the 121 monitored schools, in 3 schools it is not (Shirak, Syunik and Tavush regions), and there are no data on 14 schools (see Table 20).

Table 20

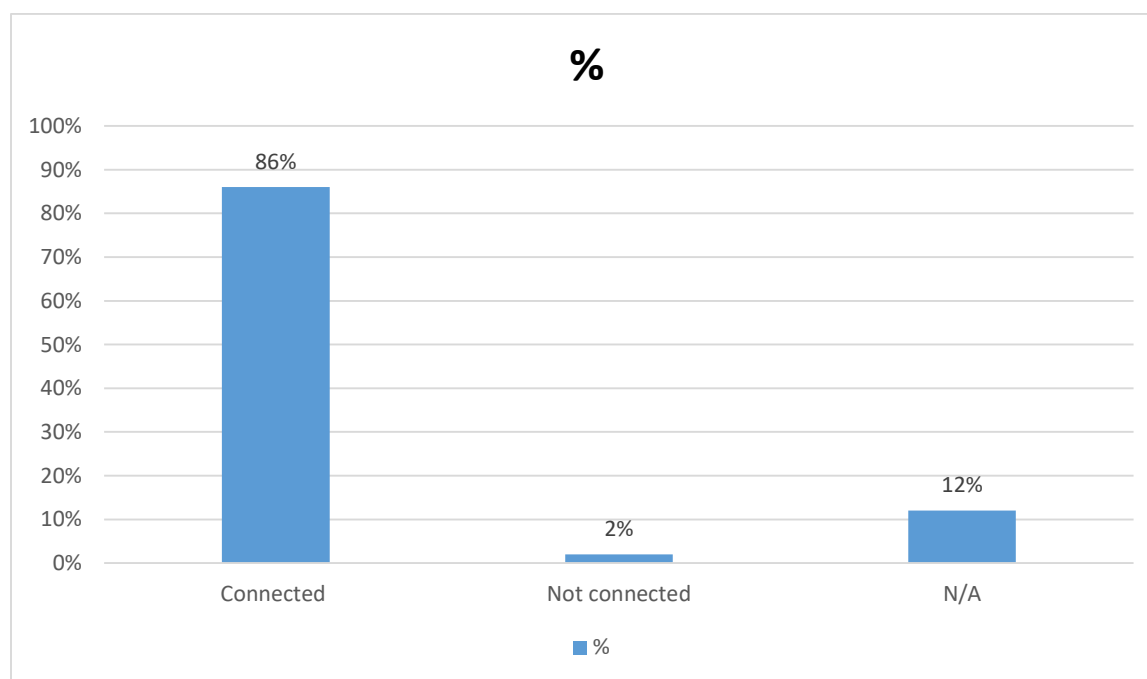


Table 21
Percentage Ratio of Water Cuts per Year
at 121 Monitored Schools

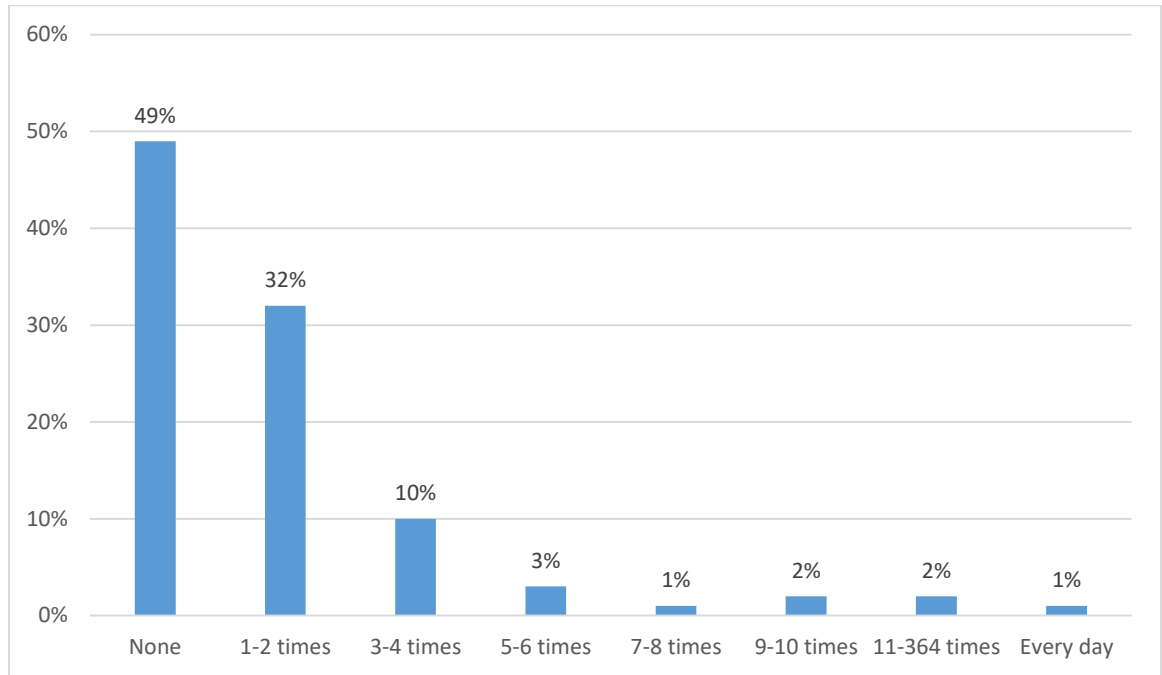
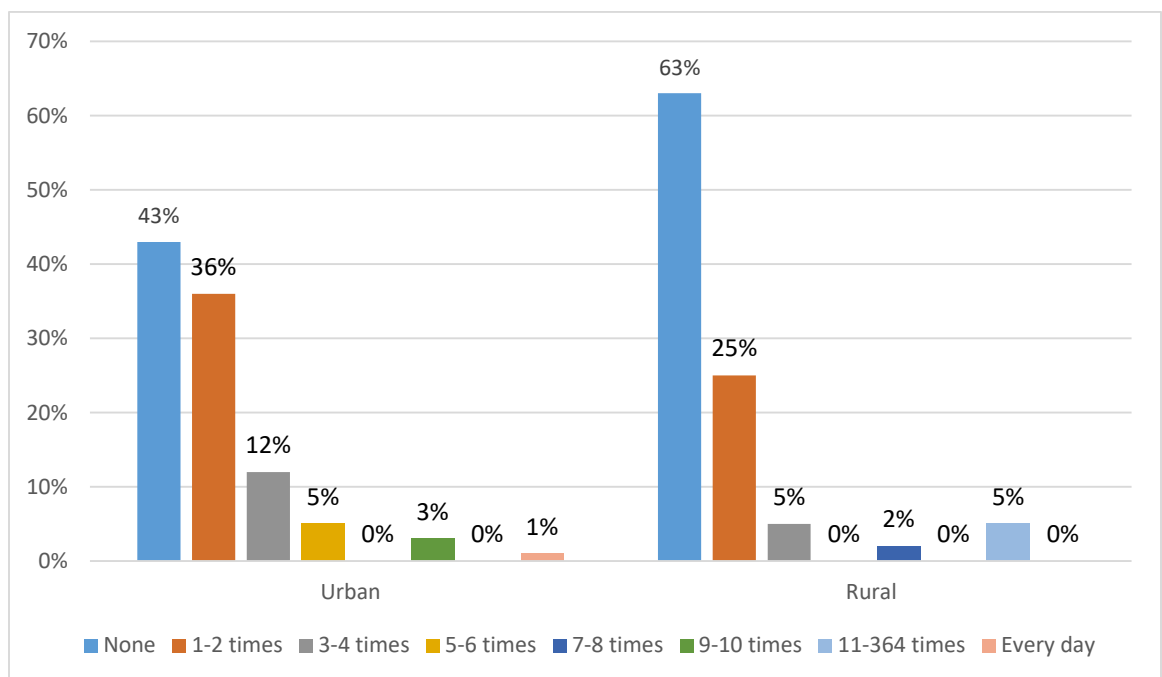


Table 22
Percentage Ratio of 121 Monitored
Urban and Rural Schools by the Water Cuts per Year



In the result of the above analysis it becomes clear that the water cuts are more frequent in the urban schools - 57% than in the rural ones - 37%.

Table 23
Percentage Ratio of 118 Monitored Schools by the Accessibility of the Nearby Tap in Case of Lack of Water in the Institution

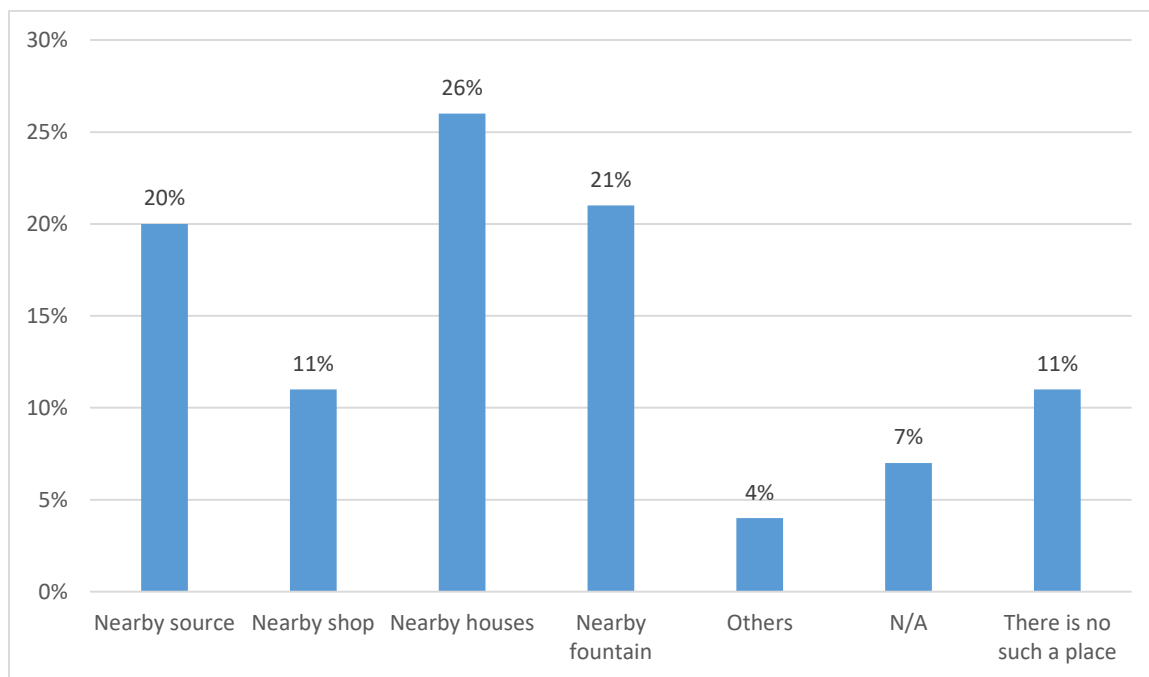
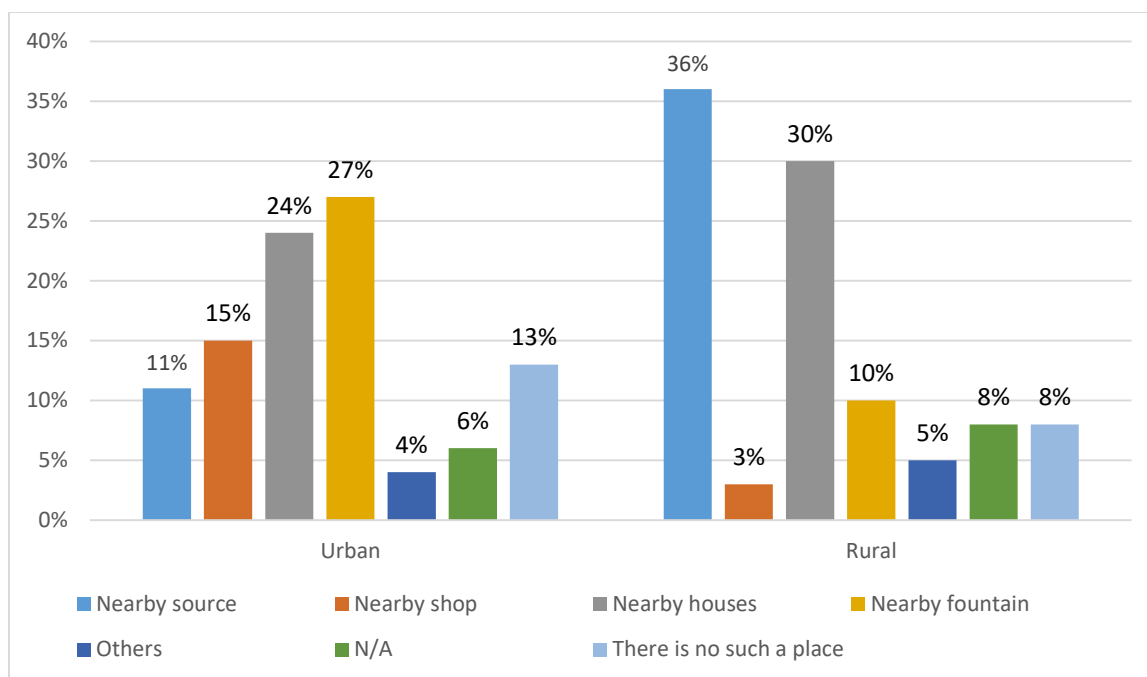


Table 24
Percentage Ratio of 118 Monitored Urban and Rural Schools by the Accessibility of the Nearby Tap in Case of Lack of Water in the Institution



3.7. HYGIENE PROCEDURE CONDITIONS

Below are introduced such indicators which are mandatory requirements in accordance with Order No 12-N of March 28, 2017 of the Ministry of Health on “Requirements Presented to Educational Institutions Carrying out General Education Programs. No 2.2.4-016-17 Sanitary Rules and Norms”.

The availability of toilets in the 1-4 classes educational structural sections (by one separate toilets envisaged for boys and girls) was studied in 109 out of 121 monitored schools. In the result of the study it became clear that no separate toilets are envisaged for 1-4 classes in 41 schools, and 12 out of 121 schools were senior high schools, where there were no 1-4 classes. The results are presented below.

Table 25
Percentage Ratio of 109 Monitored Schools by the Toilets Envisaged in the Educational Structural Sections of 1-4 Classes

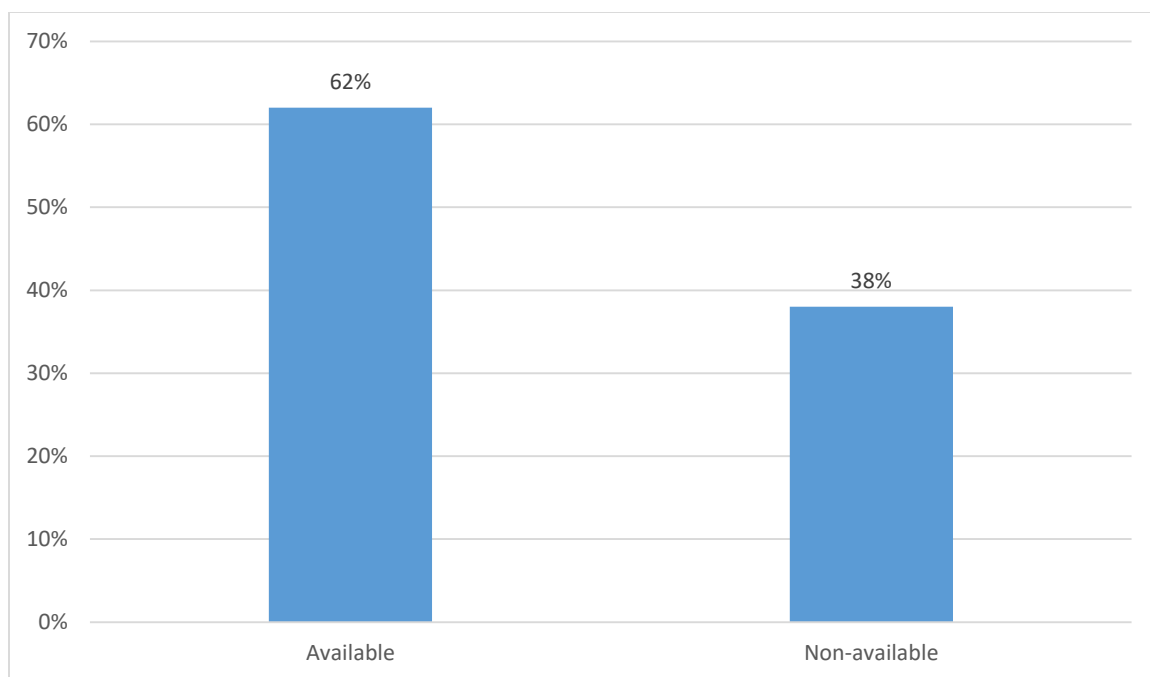


Table 26
Percentage Ratio of the Monitored Urban and Rural Schools by One Separate Toilet for Boys and Girls Envisaged in the Educational Structural Sections of 1-4 Classes

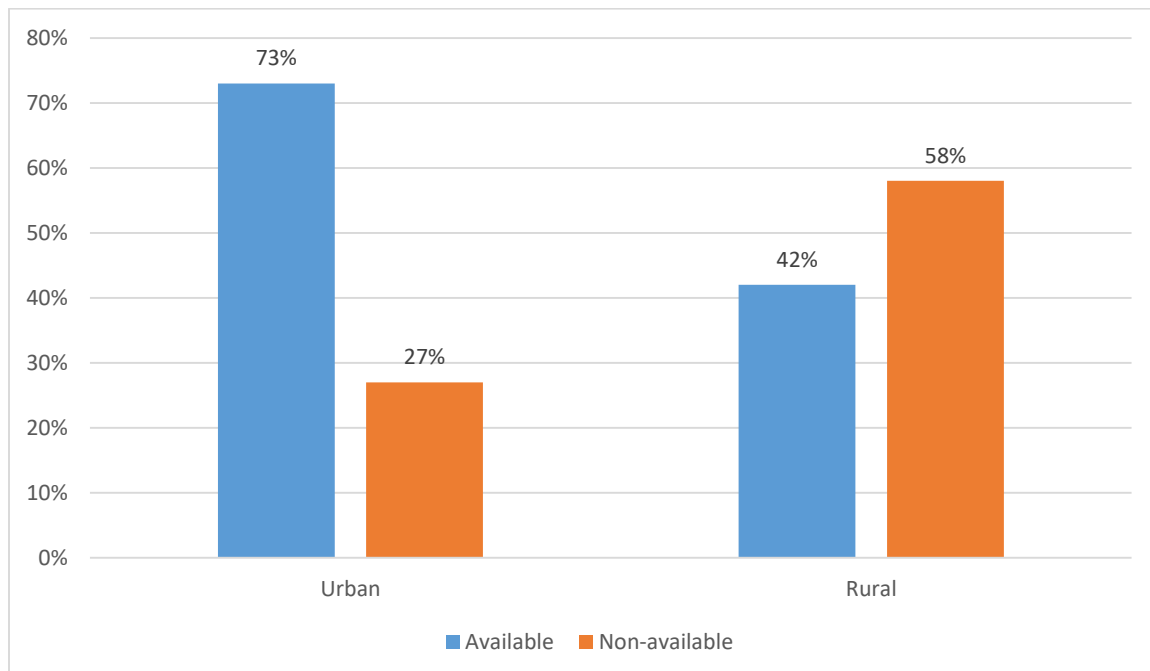
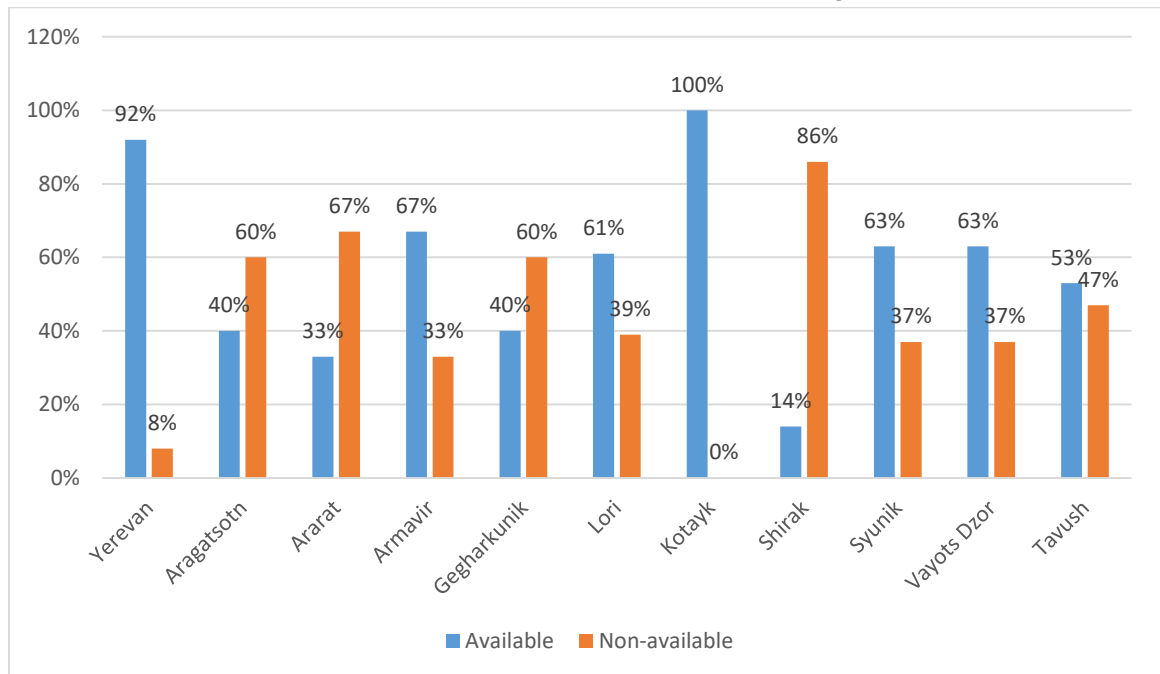


Table 27
Percentage Ratio of 109 Monitored Schools by the One Separate Toilet for Boys and Girls Envisaged in the

Educational Structural Sections of 1-4 Classes of the Regions of RA and Yerevan



During the monitoring, the fact of disposition of at least one separate toilets for boys and girls on each floor of the school buildings was studied. In the result it turned out that in the 35% of the studied schools, toilets for boys and girls on each floor of the building were lacking. It should be mentioned that such an index is problematic in terms of accessibility of sanitary conditions.

Table 28
Percentage Ratio of 121 Monitored Schools by the
Availability of Disposition of at least by One Toilet
(Separate for Boys and Girls) on Each Floor of the Buildings

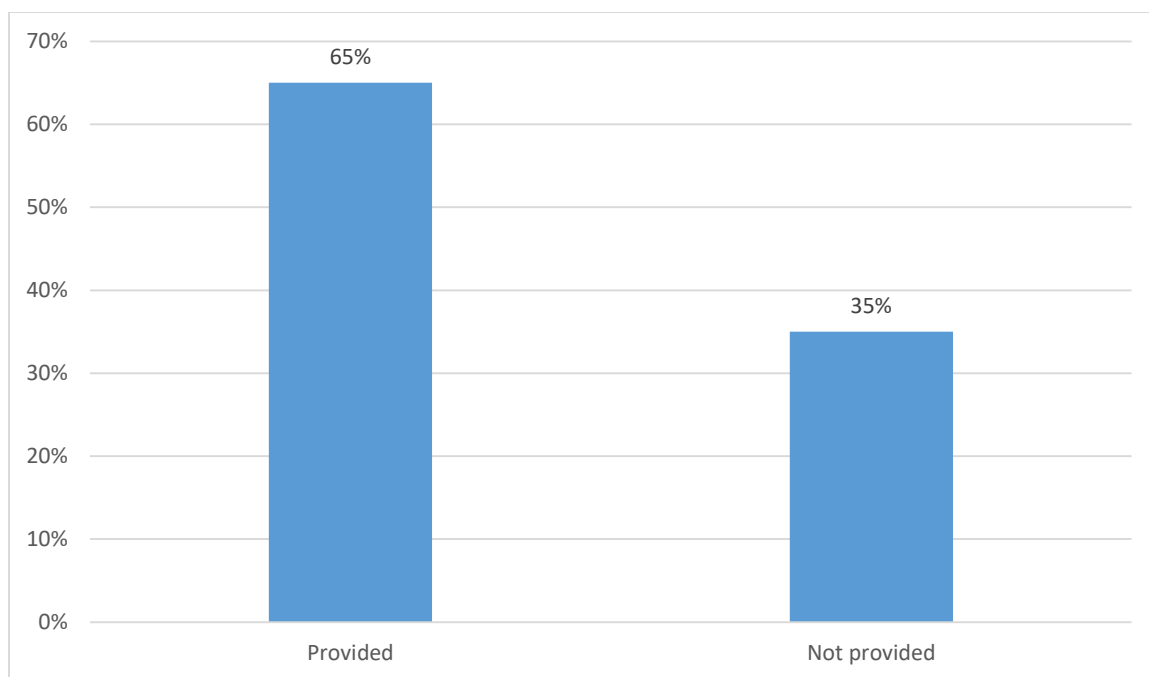
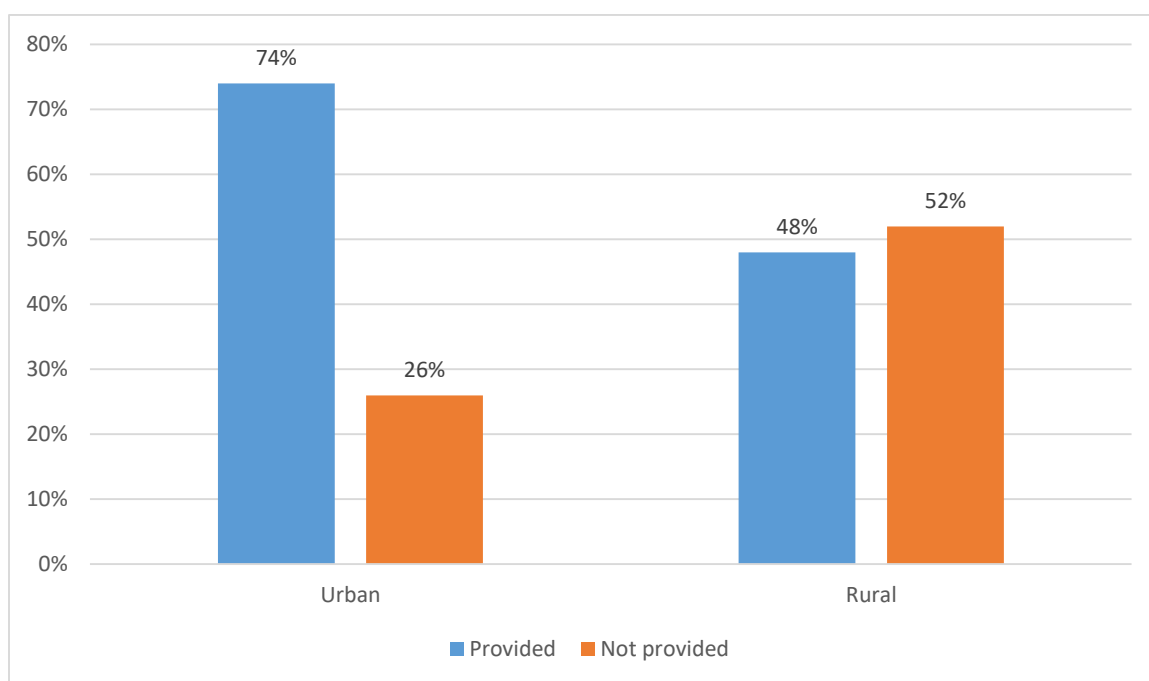


Table 29
Percentage Ratio of the Monitored Urban and Rural Schools by the Availability of Disposition of at least by One Toilet (Separate for Boys and Girls) on Each Floor of the Buildings

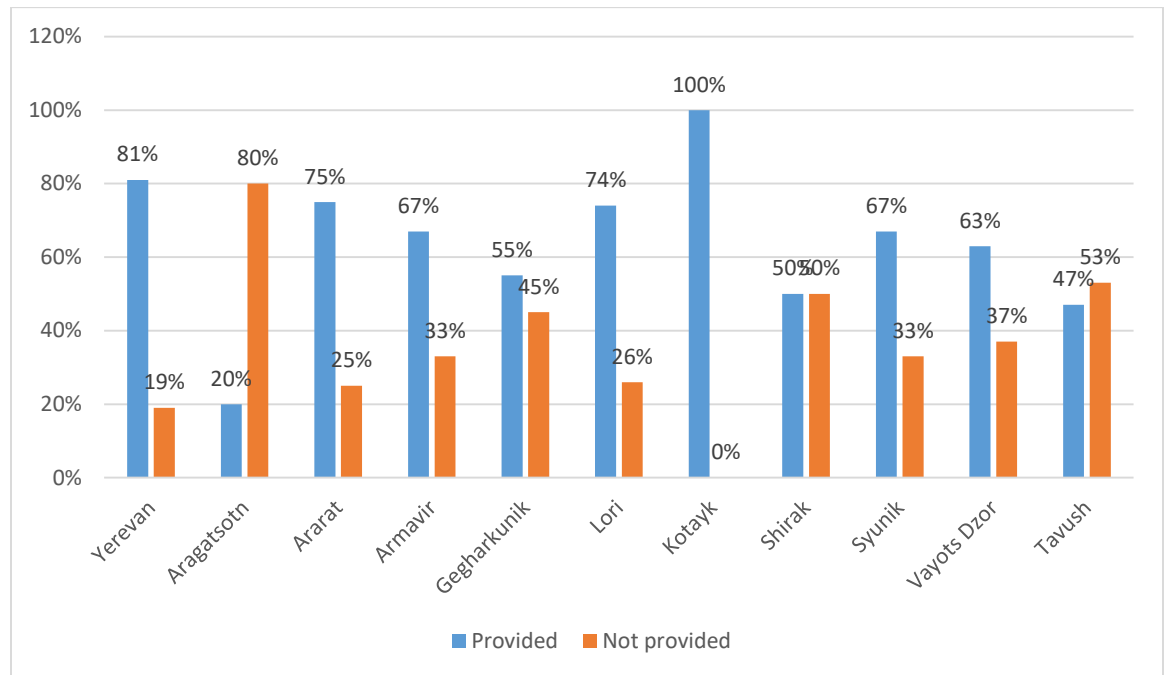


74% of the urban studied schools are provided with at least by one toilet on each floor, whereas in rural schools the index is 48%. Aragatsotn region is the least provided in terms of *disposition of, at*

least one separate toilet for boys and girls on each floor of the school buildings located in the regions (20%), the most provided is Kotayk – 100%. The provision by the regions is presented in the table.

Table 30

Percentage Ratio of 121 Monitored Schools by the Provision of at least by One Toilet for Boys and Girls on the Floors of the Buildings by the Regions of RA and Yerevan



In the 26% of cases out of 121 schools, the toilet facilities do not have complete surfaces, and in the 12% of cases the floors of the school toilets are not tiled or coated with a waterproof cover. In the 17% of cases of the studied schools, the toilets are not provided with a trap, which is problematic in terms of washing and disinfection preventive measures of spread of infectious diseases of the toilets (see Table 31).

Table 31

Percentage Ratio of 121 Monitored Schools by the Toilet Facilities with Complete Surfaces

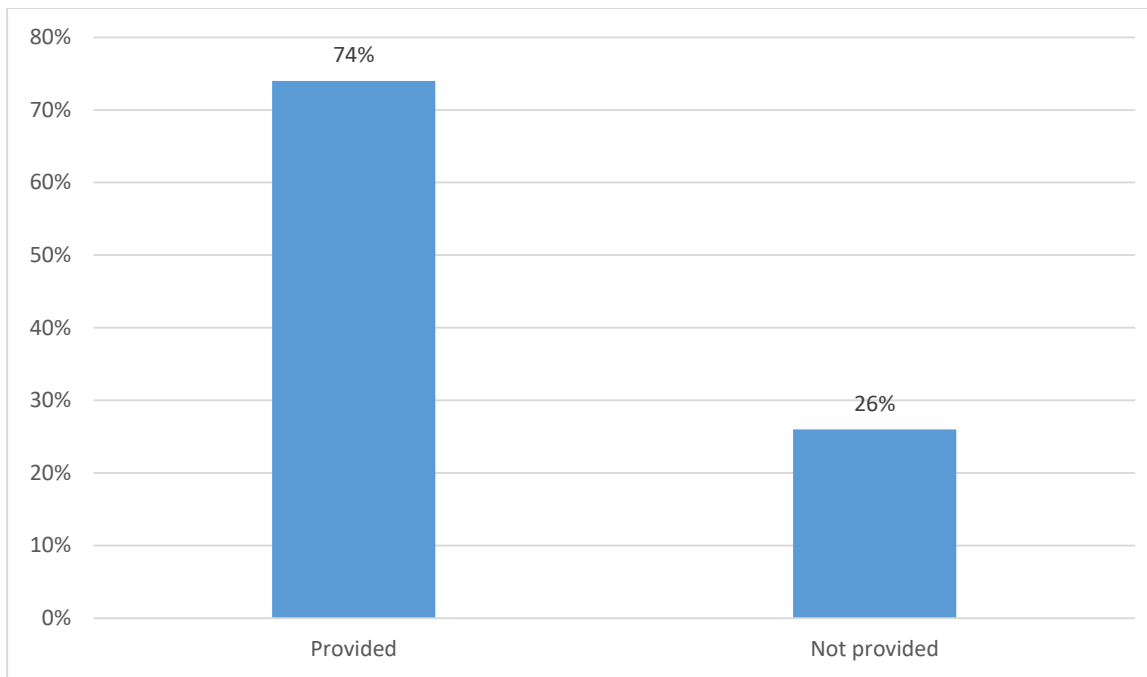


Table 32
Percentage Ratio of 121 Monitored Urban and Rural Schools by the Toilet Facilities with Complete Surfaces

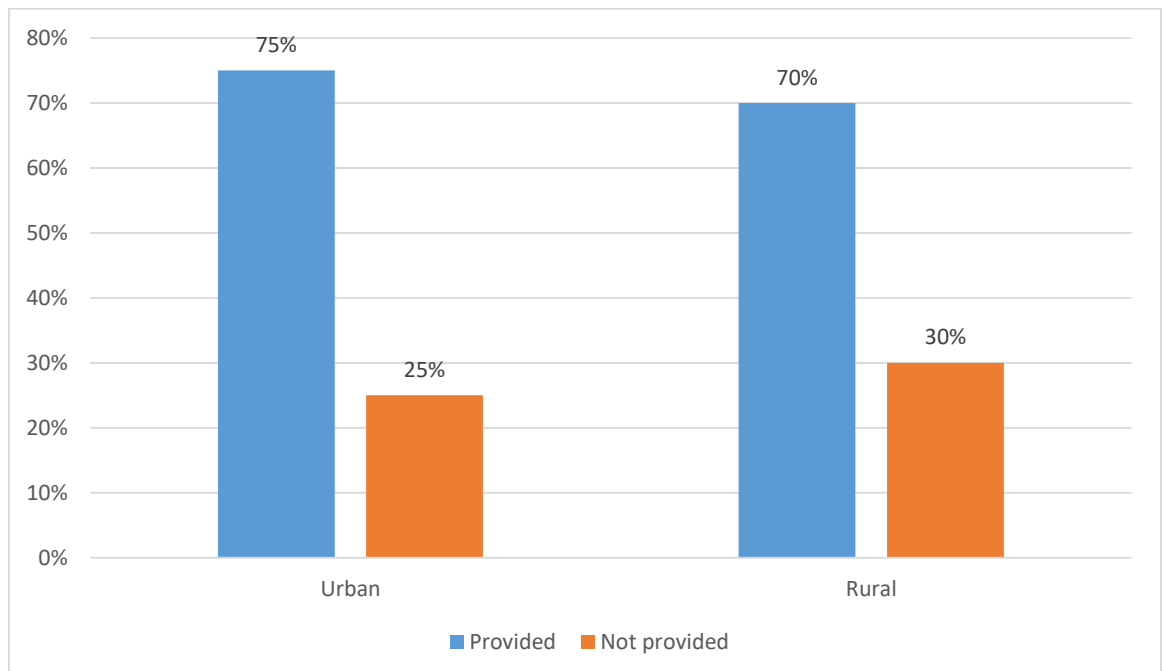


Table 33
Percentage Ratio of 121 Monitored Urban and Rural Schools by the Toilet Facilities with Complete Surfaces by the Regions of RA and Yerevan

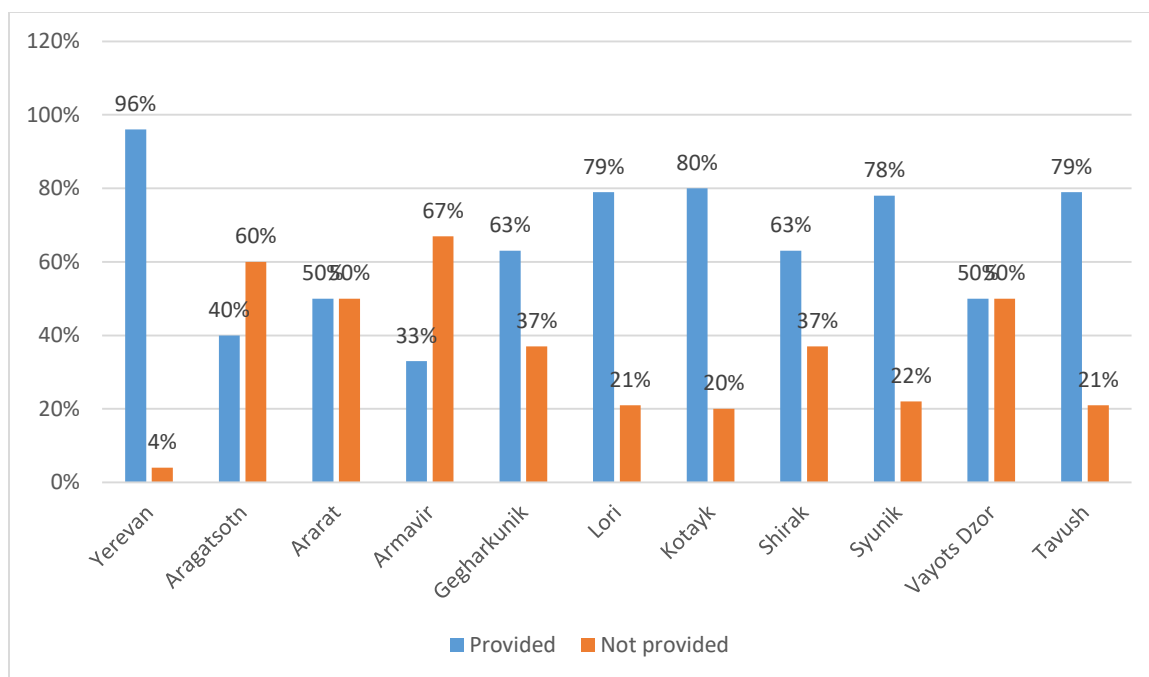


Table 34
*Percentage Ratio of 121 Monitored Schools by the
 Tiled Toilet Floors or Coated with Another Waterproof Cover*

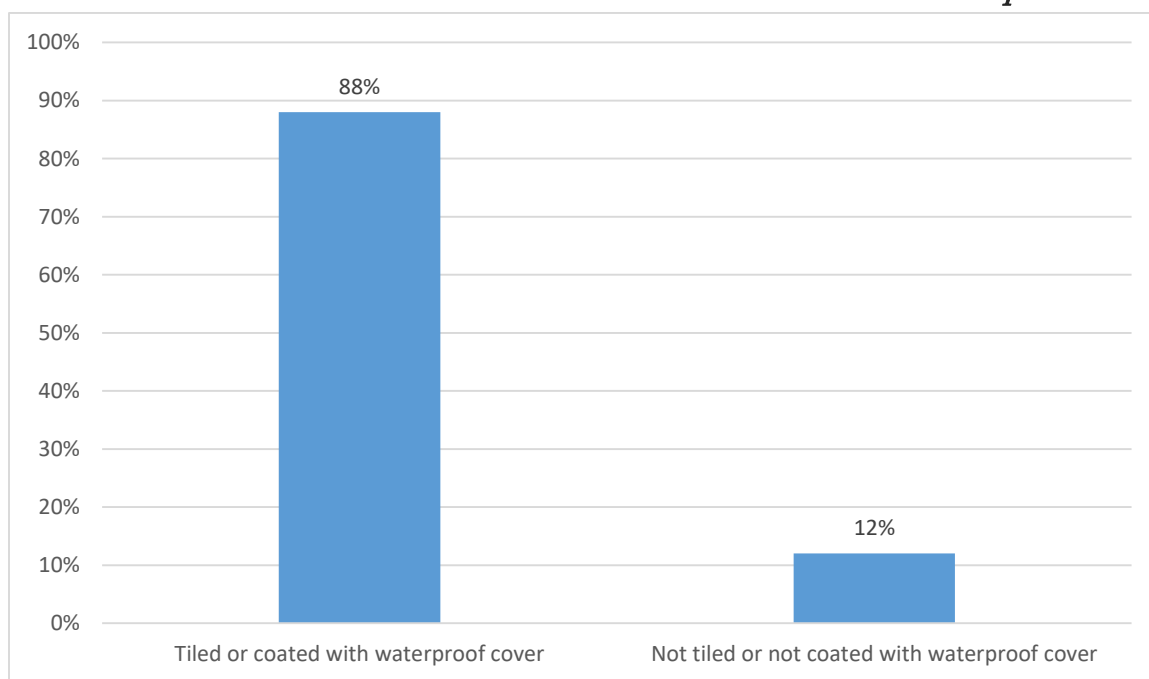


Table 35

Percentage Ratio of 121 Monitored Urban and Rural Schools by the Tiled Toilet Floors or Coated with Another Waterproof Cover

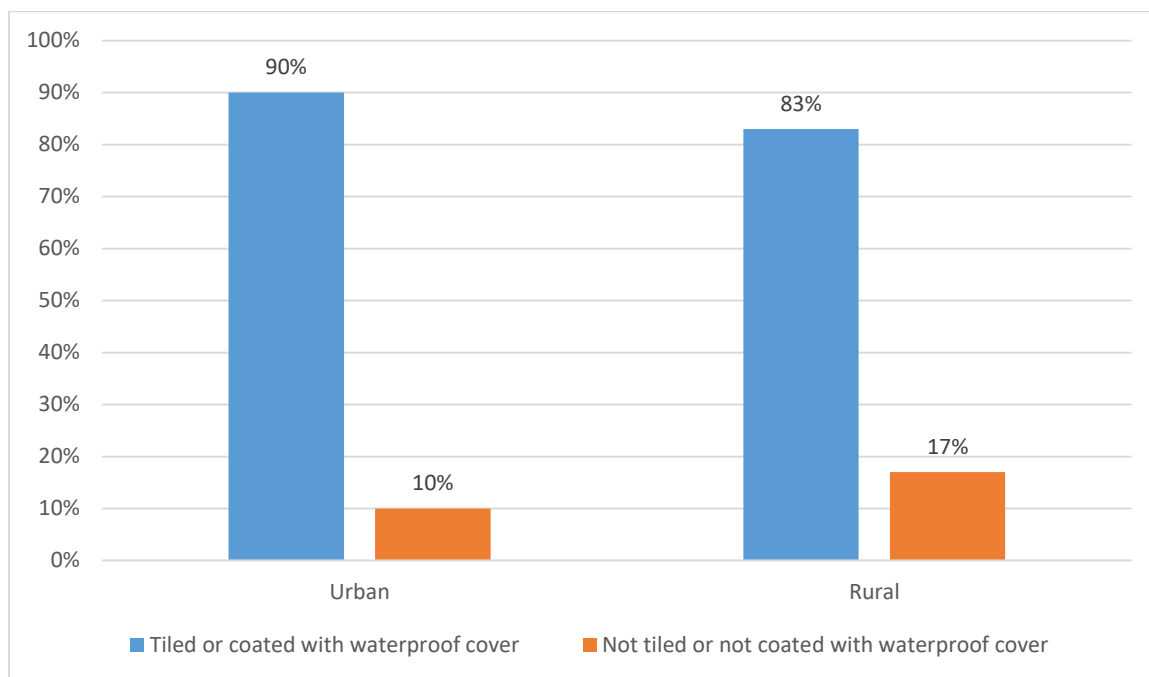


Table 36
Percentage Ratio of 121 Monitored Urban and Rural Schools by the Tiled Toilet Floors or Coated with Another Waterproof Cover by the Regions of RA and Yerevan

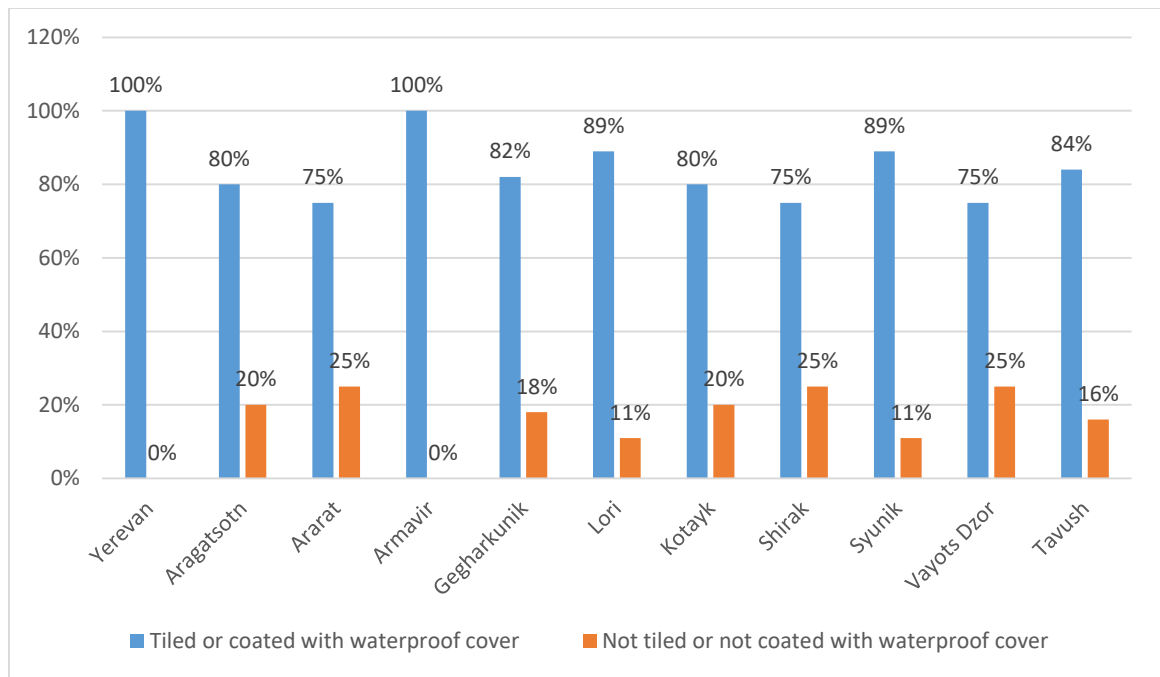


Table 37

Percentage Ratio of 121 Monitored Schools by the Provision with Toilet Traps

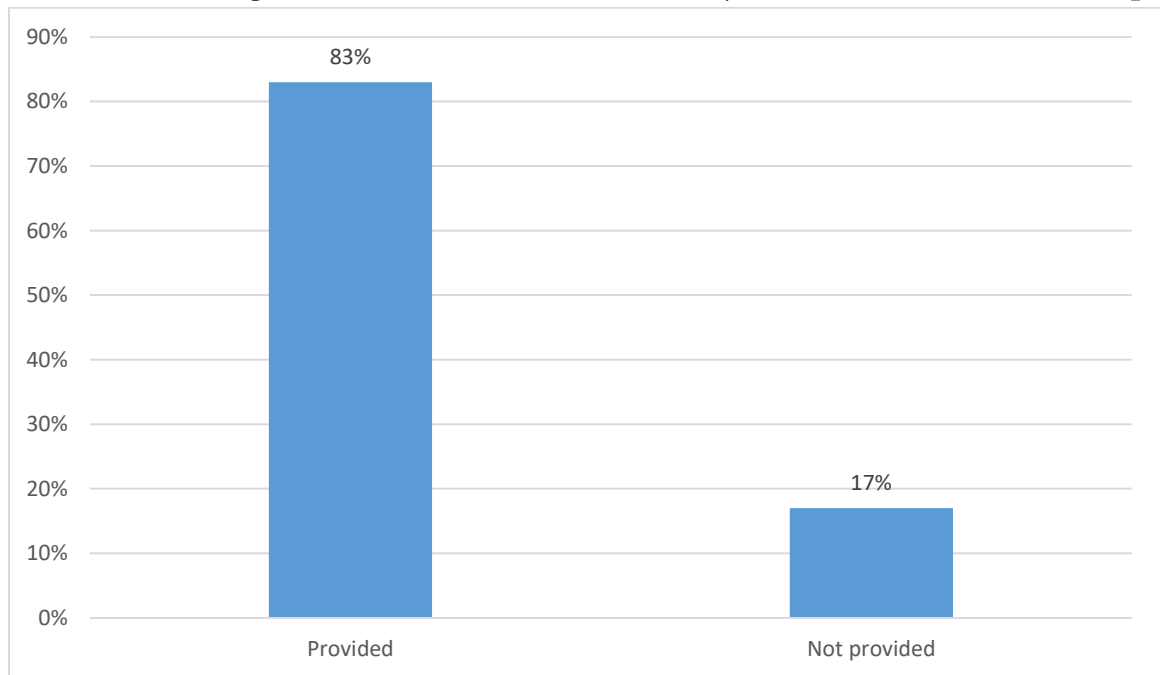
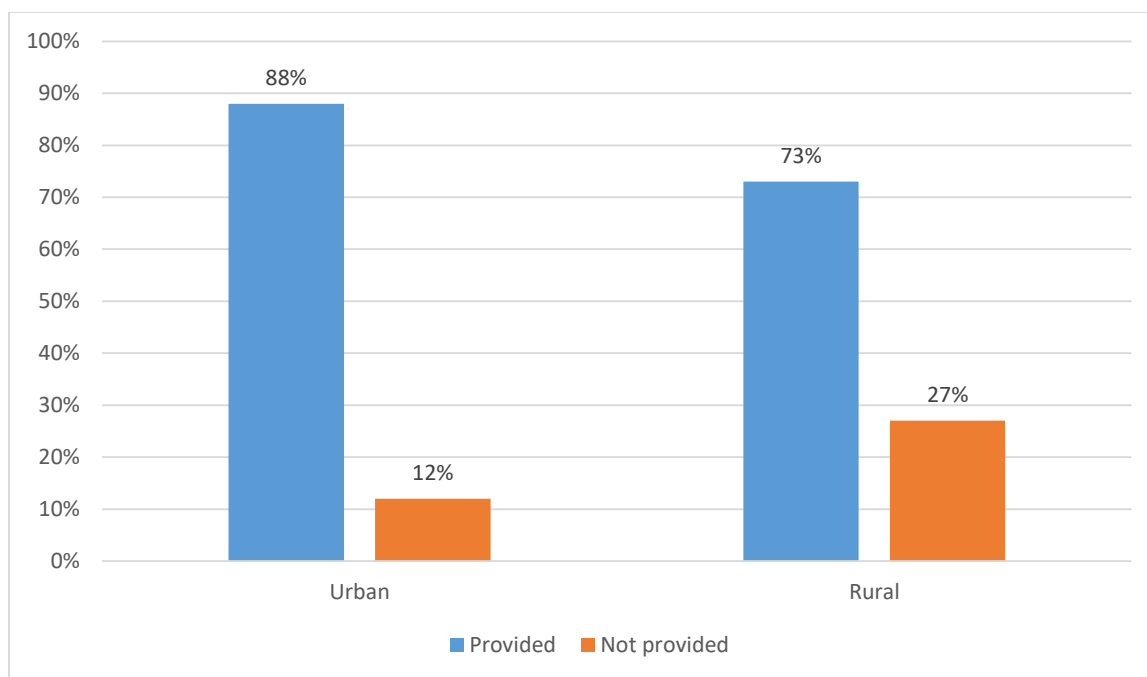


Table 38

Percentage Ratio of the Monitored Urban and Rural Schools by the Provision with Toilet Traps



The toilet bowls and other equipment are in bad repair in the 28% of cases out of 121 monitored schools, and in the 15% of cases the toilets are not provided with permanent running water, and only in the 14% of cases washbasins are connected to hot water. It is significant to mention that mainly Asian-type toilet bowls are installed in the schools, the majority of which are directly connected to the drainage net without a siphon. That is why, even in case of availability of running water, there is always specific stench in the toilets.

These indexes are significant in terms of personal hygiene and prevention of infections. Below are the presented data.

Table 39
Percentage Ratio of 121 Monitored Schools by
Good Repair of the Toilet Bowls and other Equipment

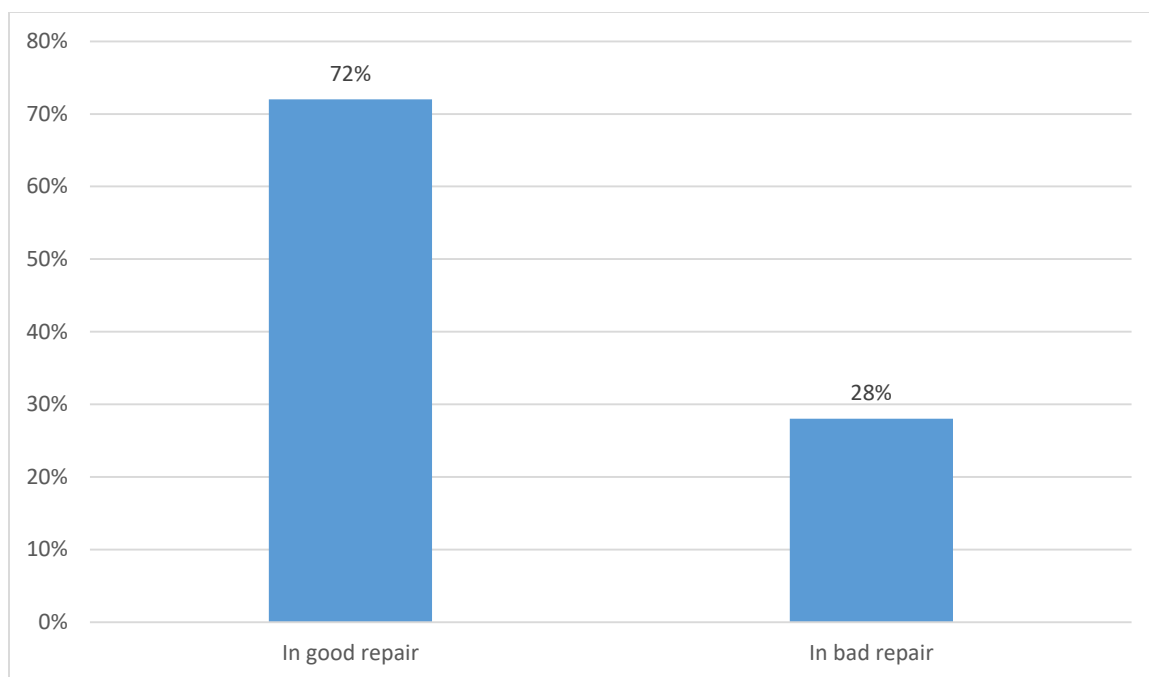
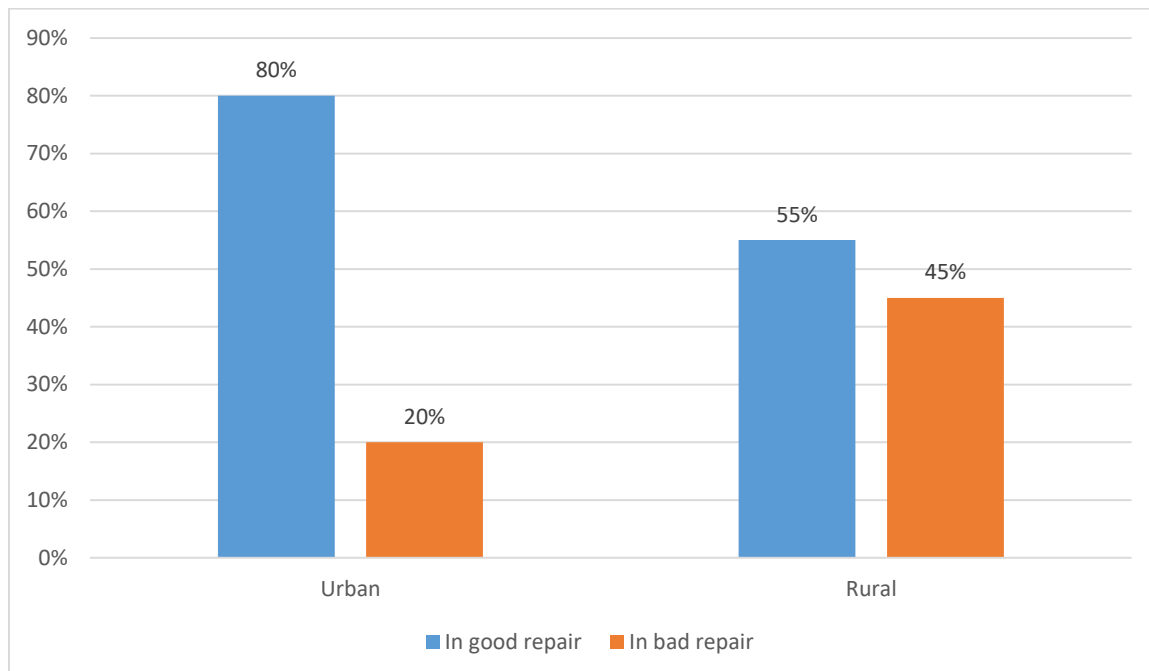
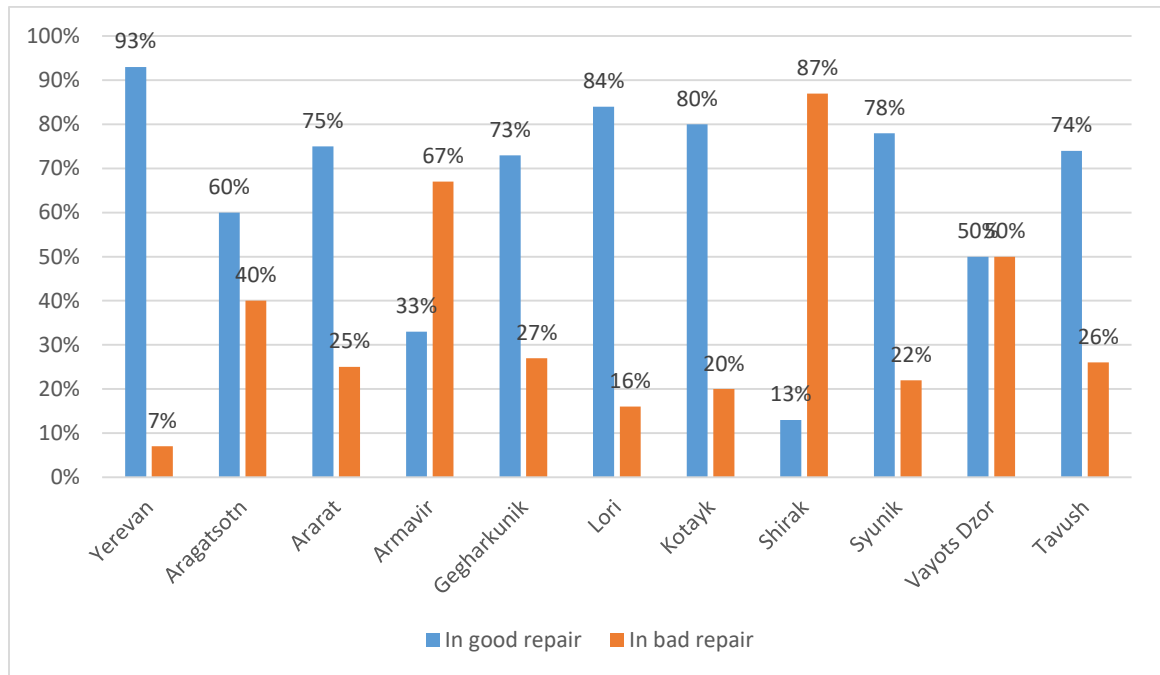


Table 40
Percentage Ratio of 121 Monitored Urban and Rural Schools by Good Repair of the Toilet Bowls and other Equipment



The difference between the urban and rural schools is evident from the presented: 20% of toilets in bad repair in the urban areas, and 45% - in the rural areas.

Table 41
Percentage Ratio of 121 Monitored
Schools by Good Repair of the Toilet Bowls and other
Equipment by the Regions of RA and Yerevan



Most insufficient situation is in Shirak (87%) and Armavir (67%) regions in terms of the mentioned index.

Table 42
Percentage Ratio of 121 Monitored Schools by the
Provision of Toilets with Permanent Running Water

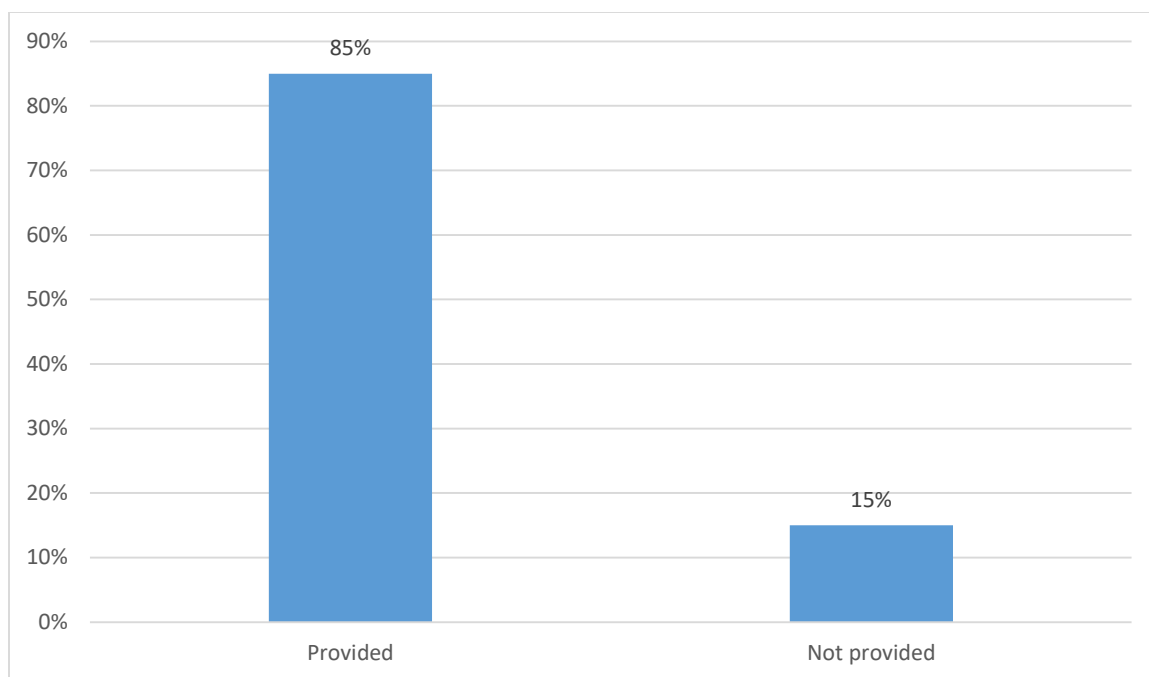
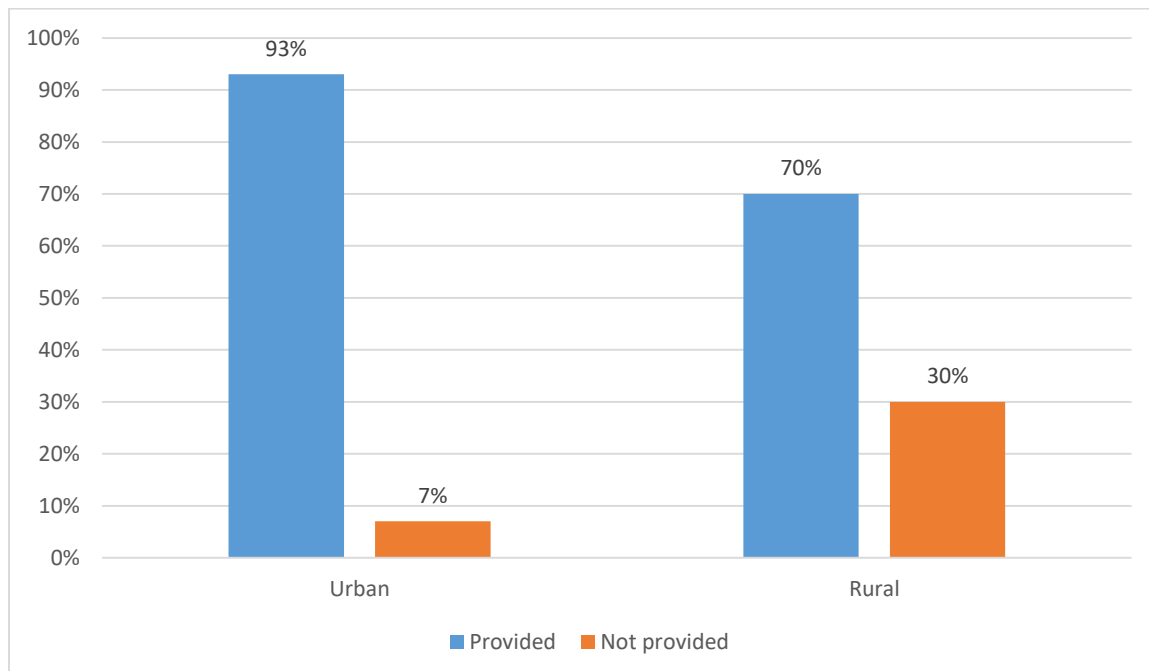


Table 43
Percentage Ratio of the Monitored Urban and Rural Schools by the Provision of Toilets with Permanent Running Water



There is lack of hot water supply in most of the monitored schools (86%), at that, the urban and rural schools almost do not differ by this index: 88% and 82% respectively.

Table 44
Percentage Ratio of 121 Monitored Schools by the

Availability of Hot Water in the Washbasins

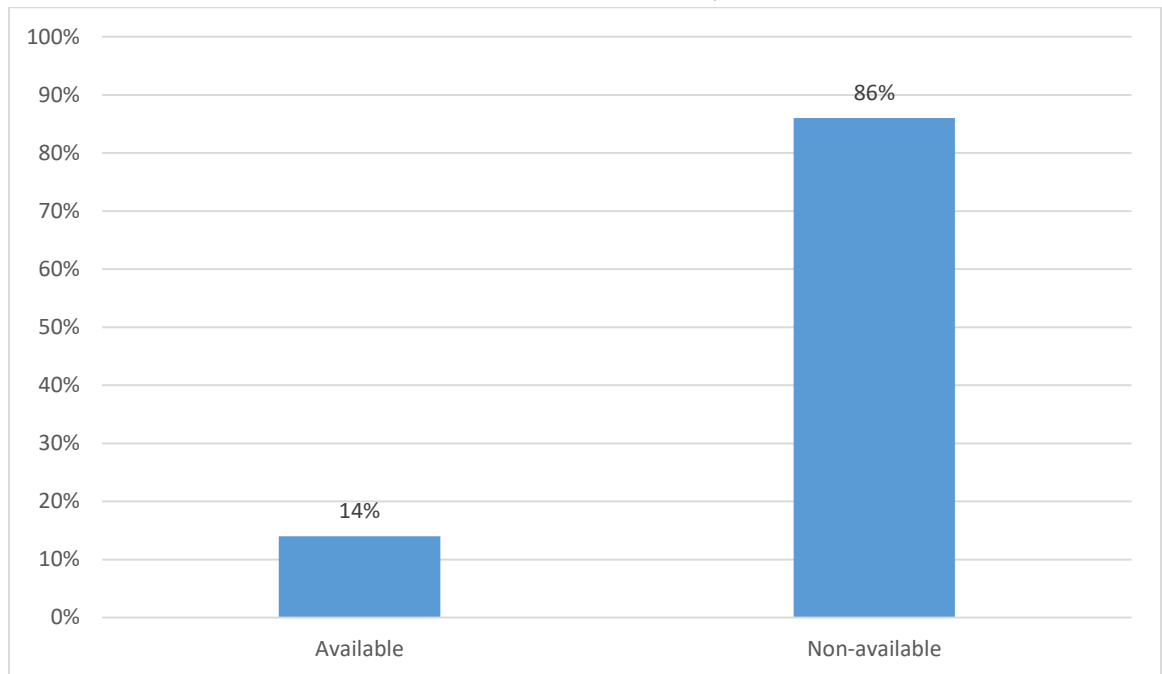
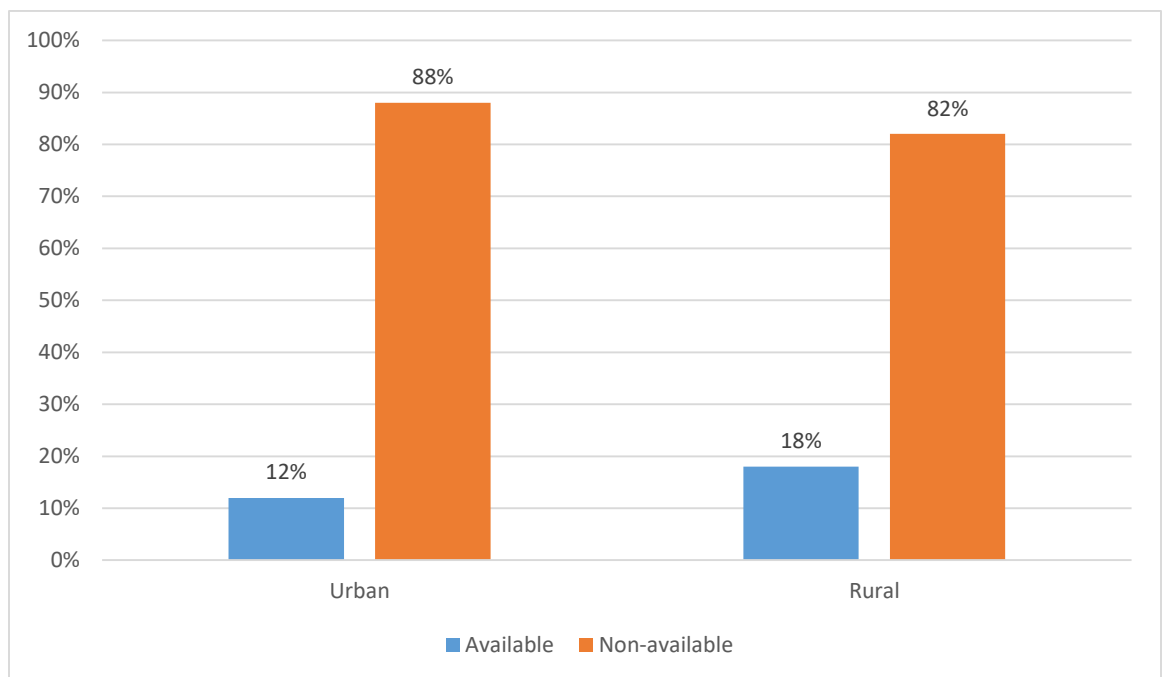


Table 45
Percentage Ratio of the Monitored Urban and Rural Schools by the
Availability of Hot Water in the Washbasins



The toilet facilities and equipment are not provided with liquid soap in the 71% of cases out of the 121 monitored schools, in the 76% of cases the toilet facilities are not provided with toilet paper,

and only the 7% of the studied toilets are provided with hand-dryer electric appliances or disposable paper towels. Below are presented more detailed analyzes of these indicators in the form of tables.

Table 46

Percentage Ratio of 121 Monitored Schools by the Provision of the Toilet Facilities and Equipment with Liquid Soap

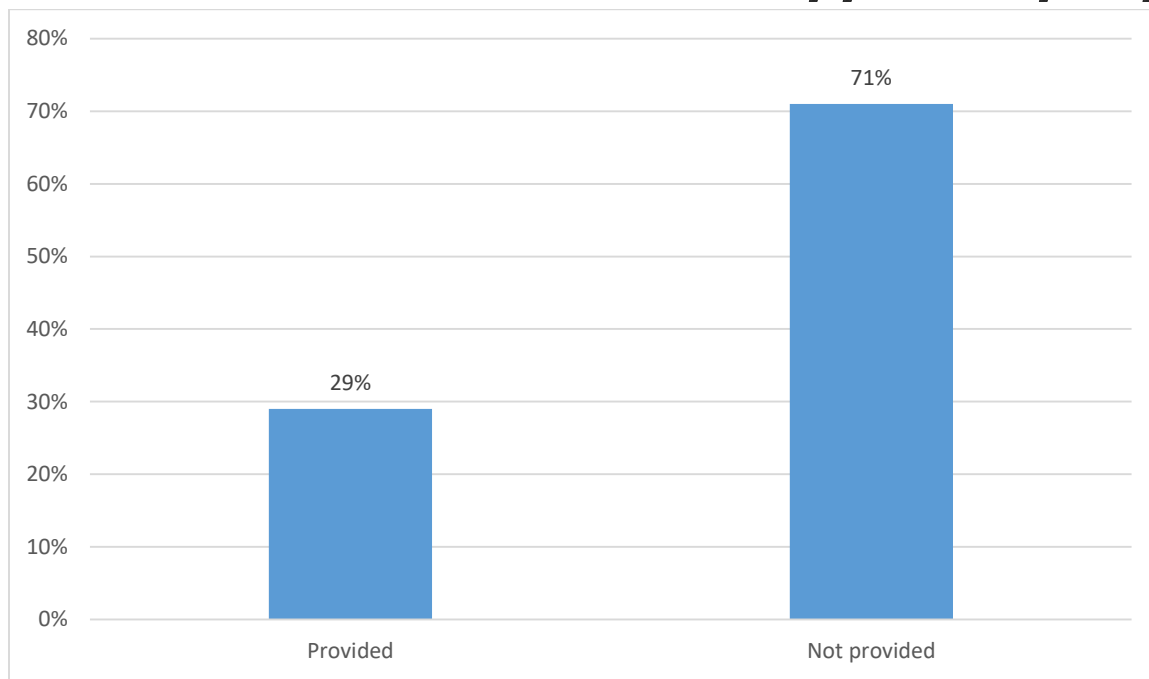
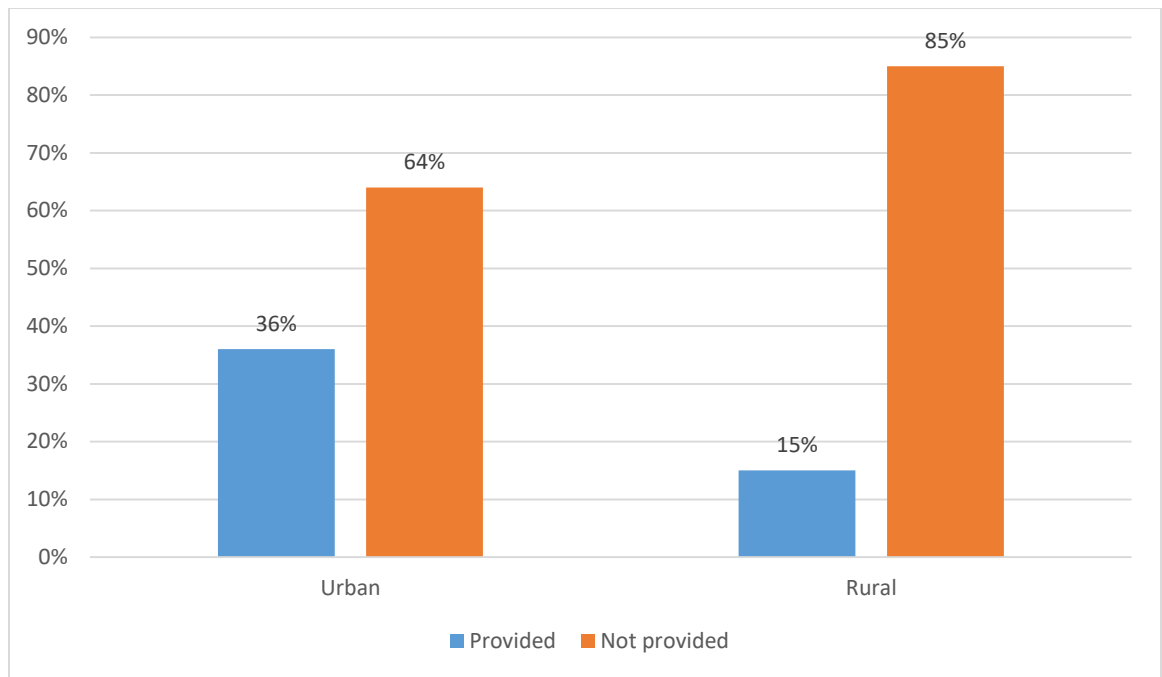


Table 47

Percentage Ratio of the Monitored Urban and Rural Schools by the Provision of the Toilet Facilities and Equipment with Liquid Soap



36% of the urban schools and the 15% of rural schools are provided with liquid soap. However, this index is noticeably higher in Kotayk region - 60% and in Yerevan - 52%.

Table 48
Percentage Ratio of 121 Monitored Schools by the Provision of the Toilet Facilities and Equipment with Liquid Soap by the Regions of RA and Yerevan

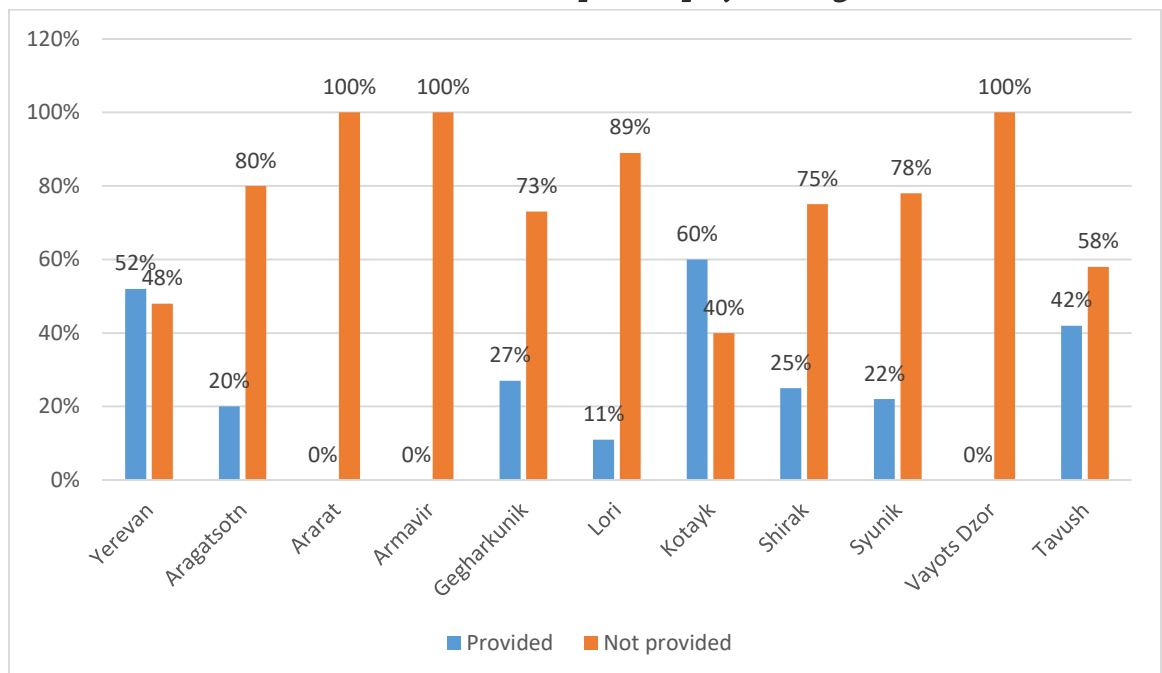


Table 49
Percentage Ratio of 121 Monitored Schools by the
Provision with Toilet Paper

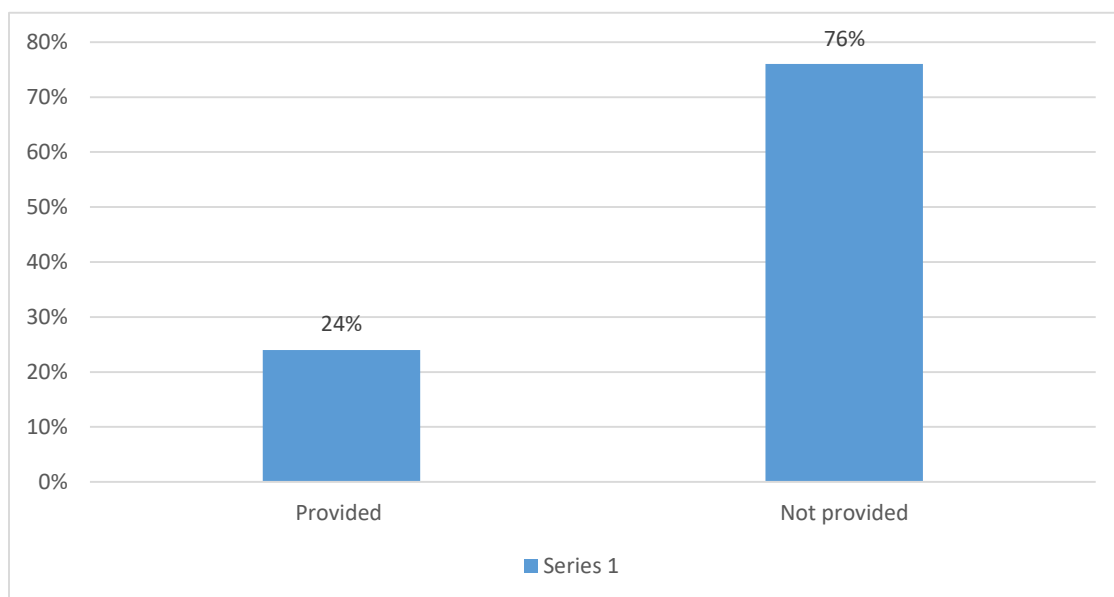


Table 50
Percentage Ratio of the Monitored Urban and Rural Schools by the
Provision with Toilet Paper

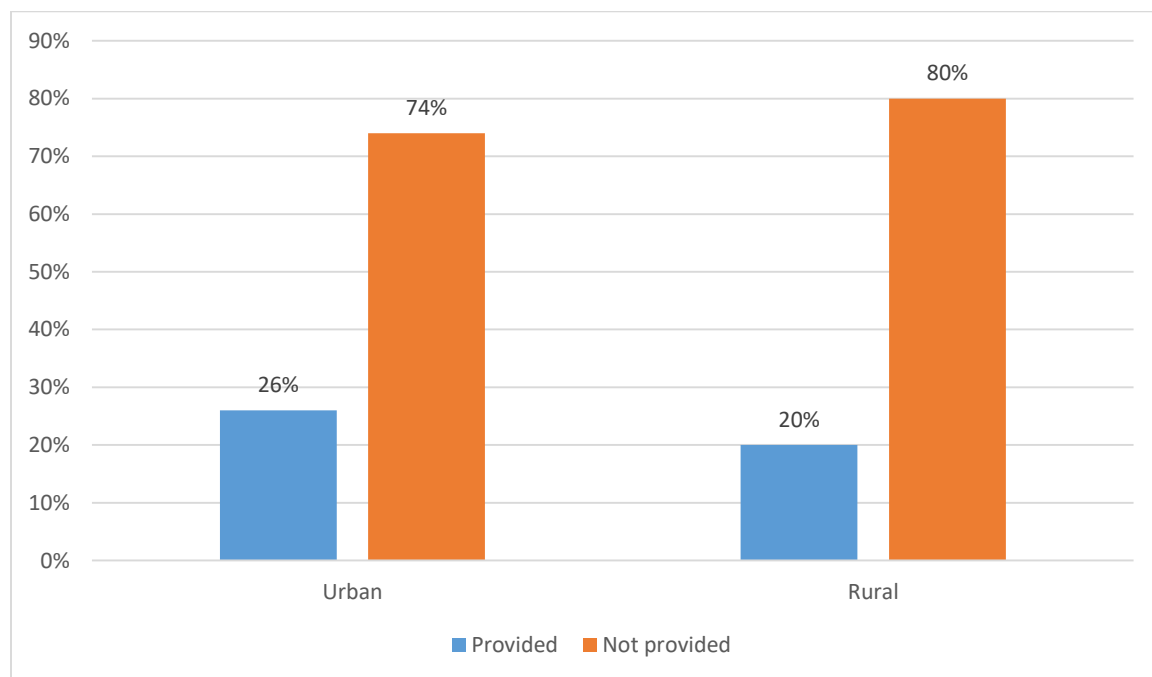
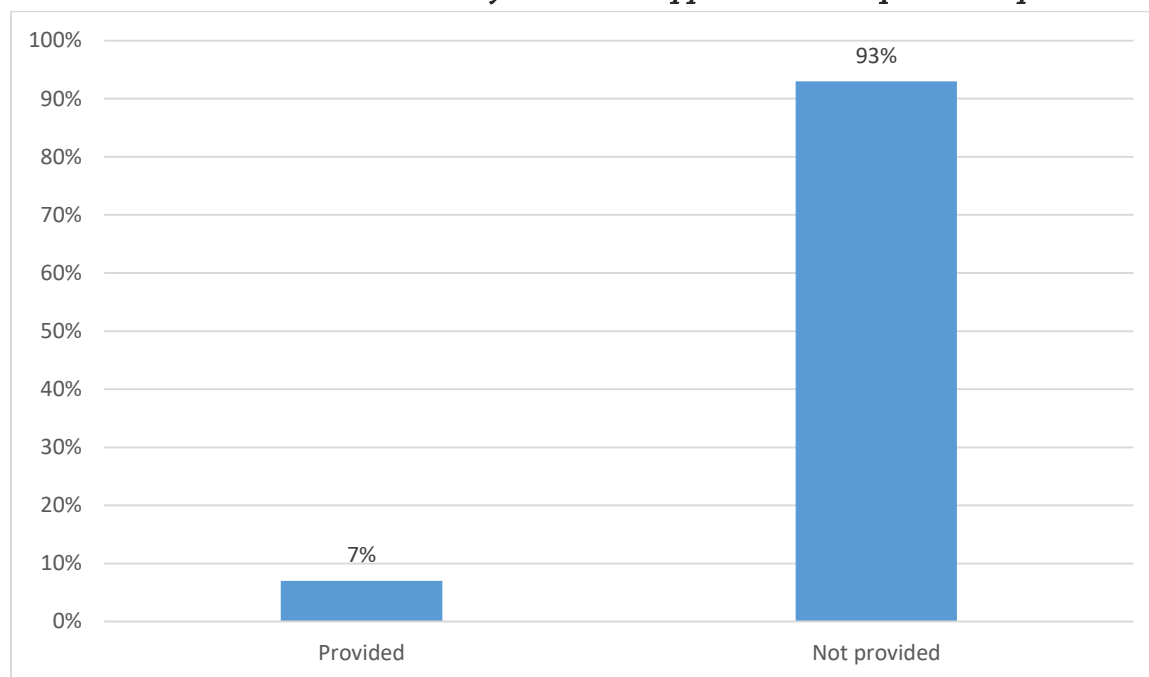
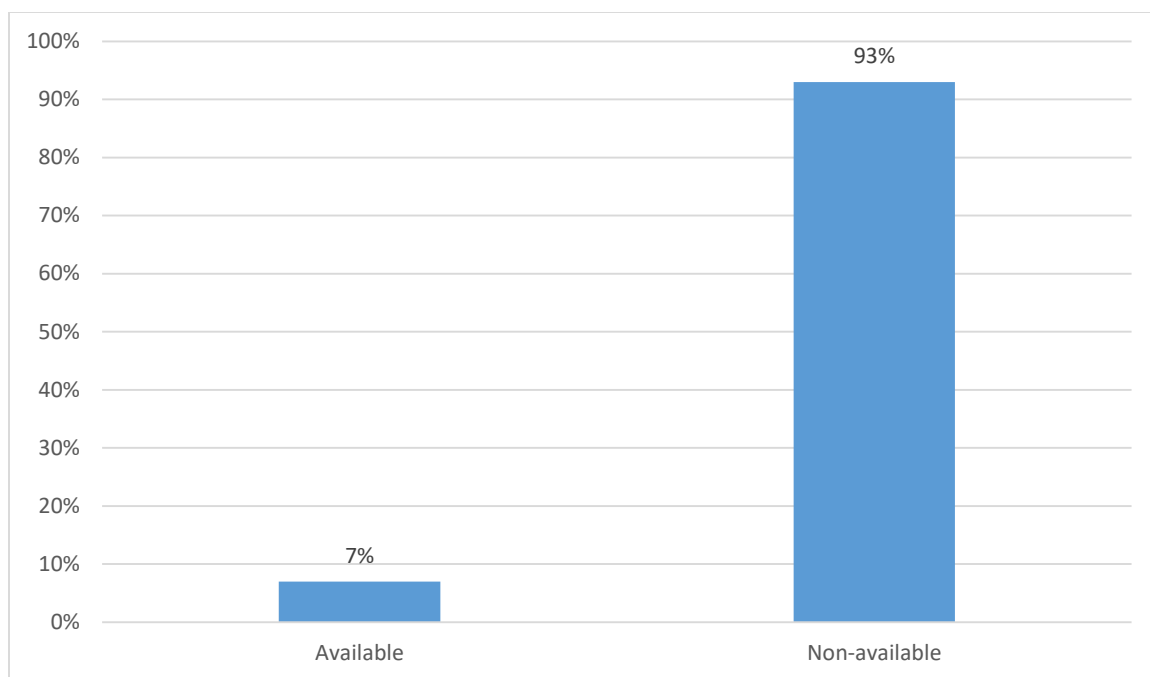


Table 51
Percentage Ratio of 121 Monitored Schools by the
Provision with Hand-Dryer Electric Appliances or Disposable Paper Towels



Toilets for children with disabilities and low mobility are available only in 8 out of the 121 monitored schools. These indexes are significant in terms of accessibility of sanitary conditions for children with disabilities and low mobility and the staff of the school. No toilets are foreseen for the staff in each building of the 26 out of the 121 studied schools.

Table 52
Percentage Ratio of 121 Monitored Schools by the
Availability of Adapted Toilets for Children with Disabilities and Low Mobility



79% of the schools are provided with toilets foreseen for the staff, at that, the indexes of the urban and rural schools almost do not differ: 80% and 75% respectively. Only Armavir region stands out, where the 75% of the schools are not provided with toilets foreseen for the staff.

Table 53
Percentage Ratio of 121 Monitored Schools by the Availability of Toilets Foreseen for the Staff in Each Building

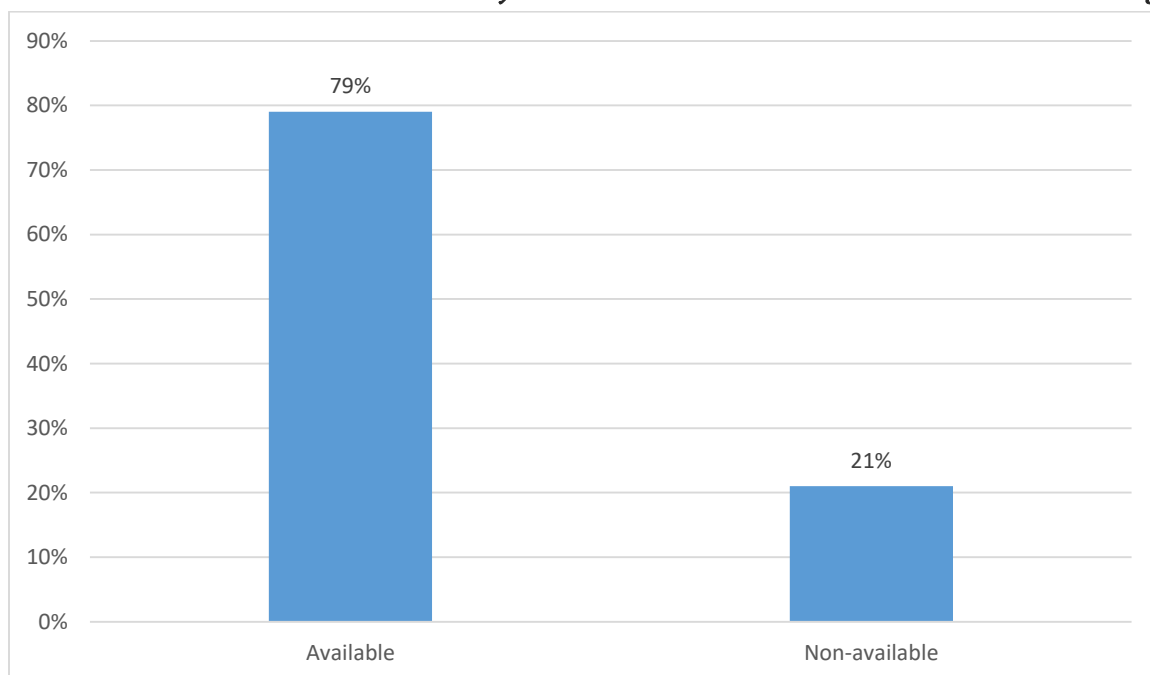
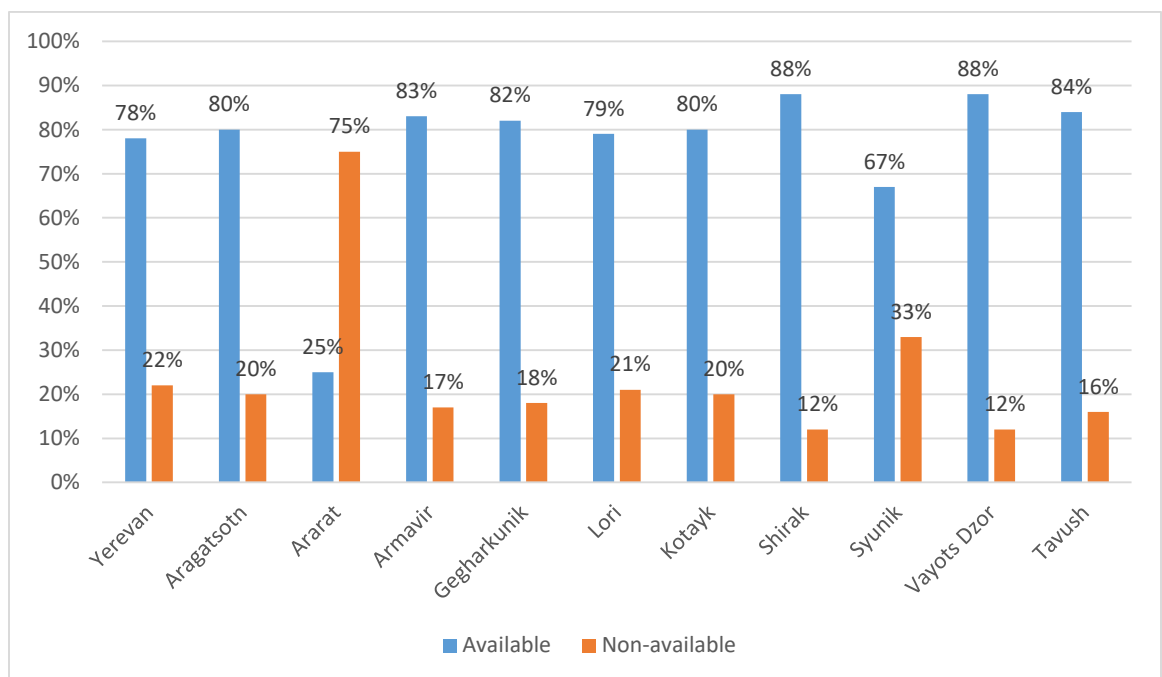


Table 54
Percentage Ratio of the Monitored Urban and Rural Schools by the

Availability of Toilets Foreseen for the Staff in Each Building



Table 55
Percentage Ratio of 121 Monitored Schools by the Availability of Toilets Foreseen for the Staff in Each Building by the Regions of RA and Yerevan



RESULTS OF THE PRESCHOOL STUDIES

The study was carried out in 80 kindergartens located in the regions and Yerevan, 51 of which were urban, and 29 were rural.

Table 56

Percentage Ratio of Urban and Rural Kindergartens

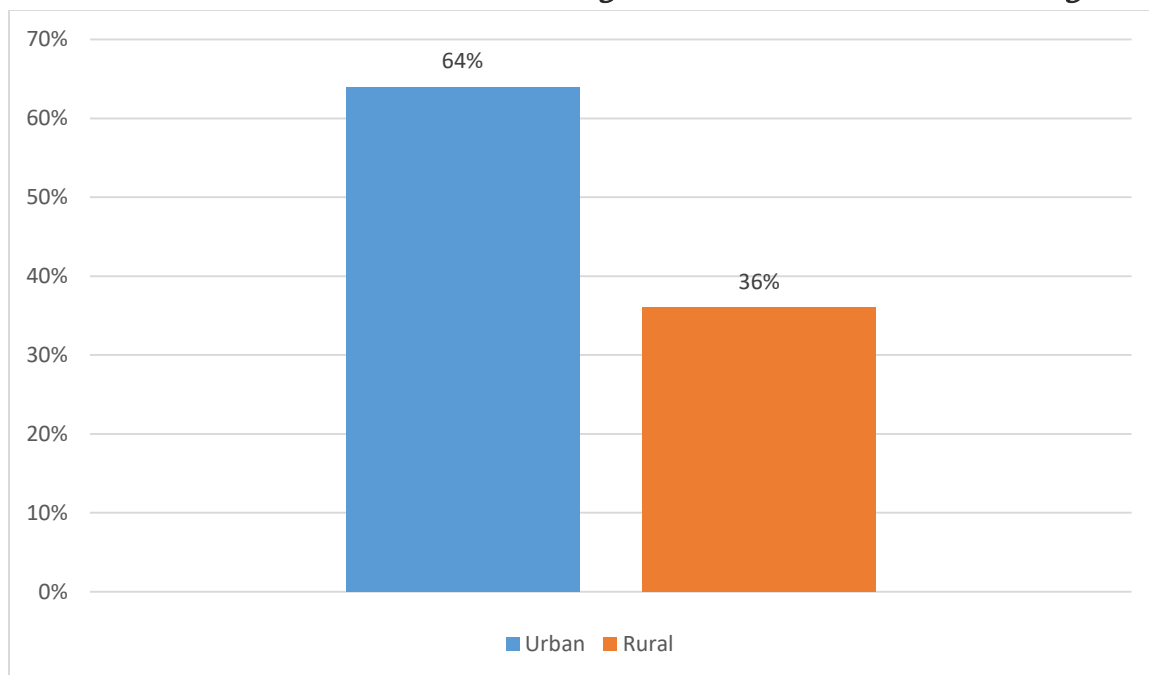
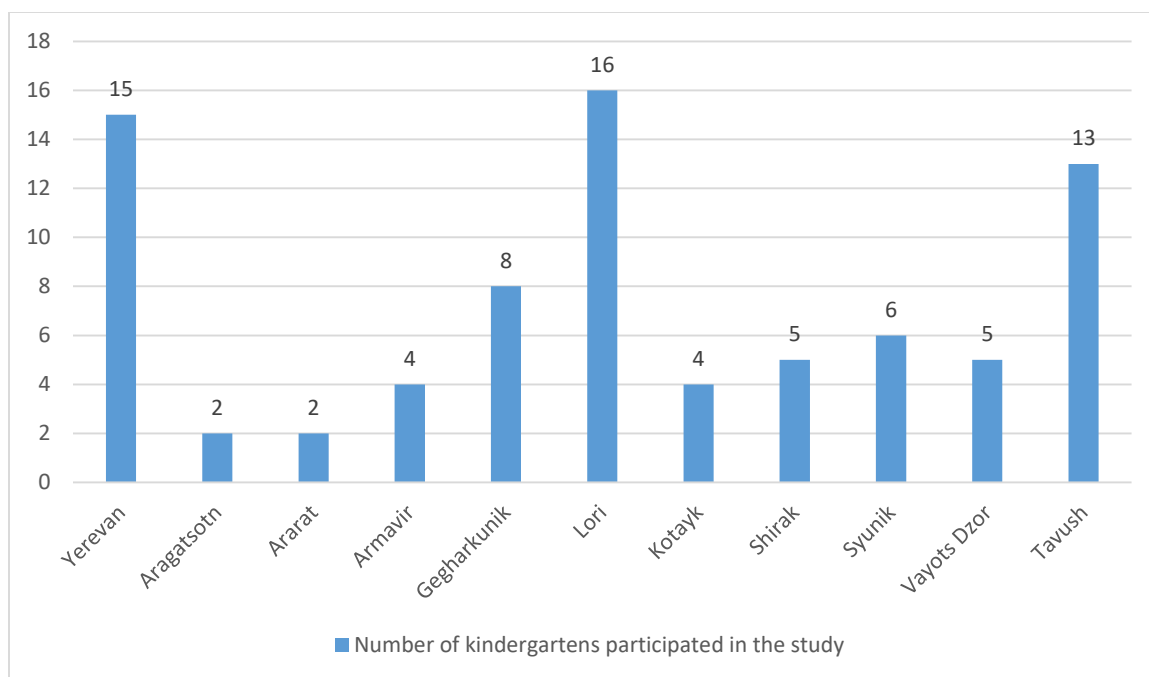


Table 57

Distribution of 80 Monitored Kindergartens by the Regions of RA and Yerevan



4.1 WATER SUPPLY. INTERNAL NET

According to Order No 857 of the Minister of Health of RA “On Approval of N 2002 Sanitary Norms and Rules of the Preschools (Institutions)”, the buildings of the organizations should be provided with internal water supply net and hot water supply.

The study was carried out in 80 preschools, all of which were provided with an internal water supply net. Whereas, 45 out of the 80 studied institutions (56%) were not provided with hot water supply. At that, there is lack of hot water supply in the 62% of cases in the rural preschools. The study data are presented in Tables 3, 4, 5.

Table 58
Percentage Ratio of 80 Monitored Preschools by the
Provision of the Buildings with Hot Water Supply

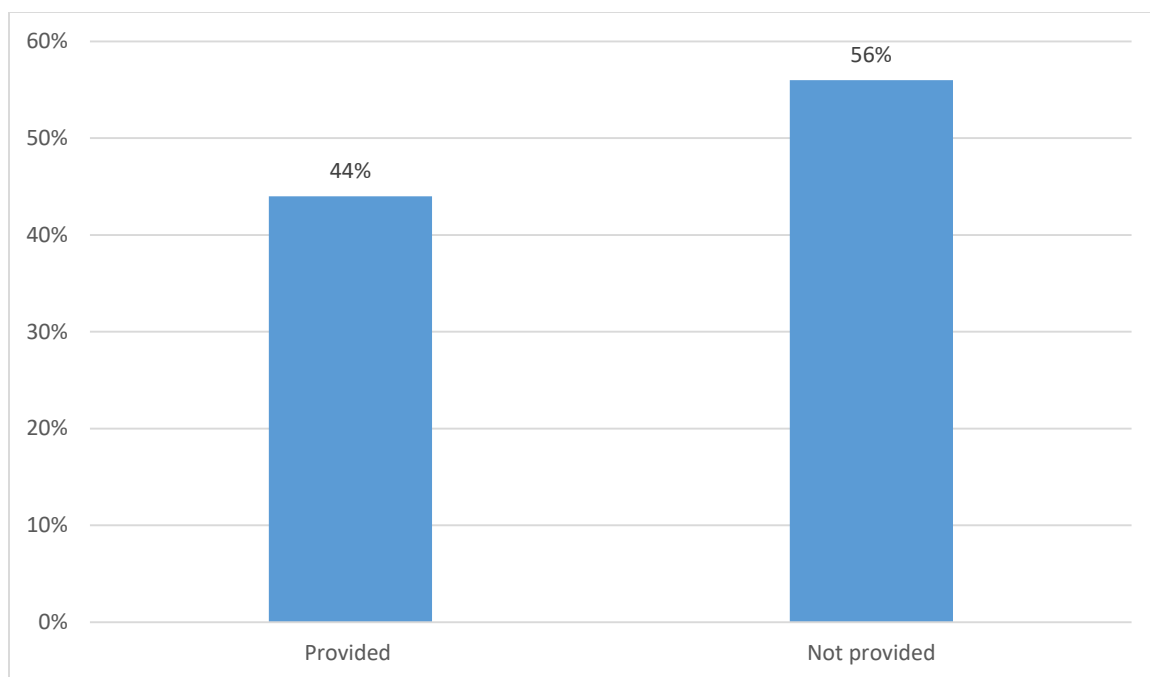


Table 59
Percentage Ratio of 80 Monitored Urban and Rural Preschools by the Provision of the Buildings with Hot Water Supply

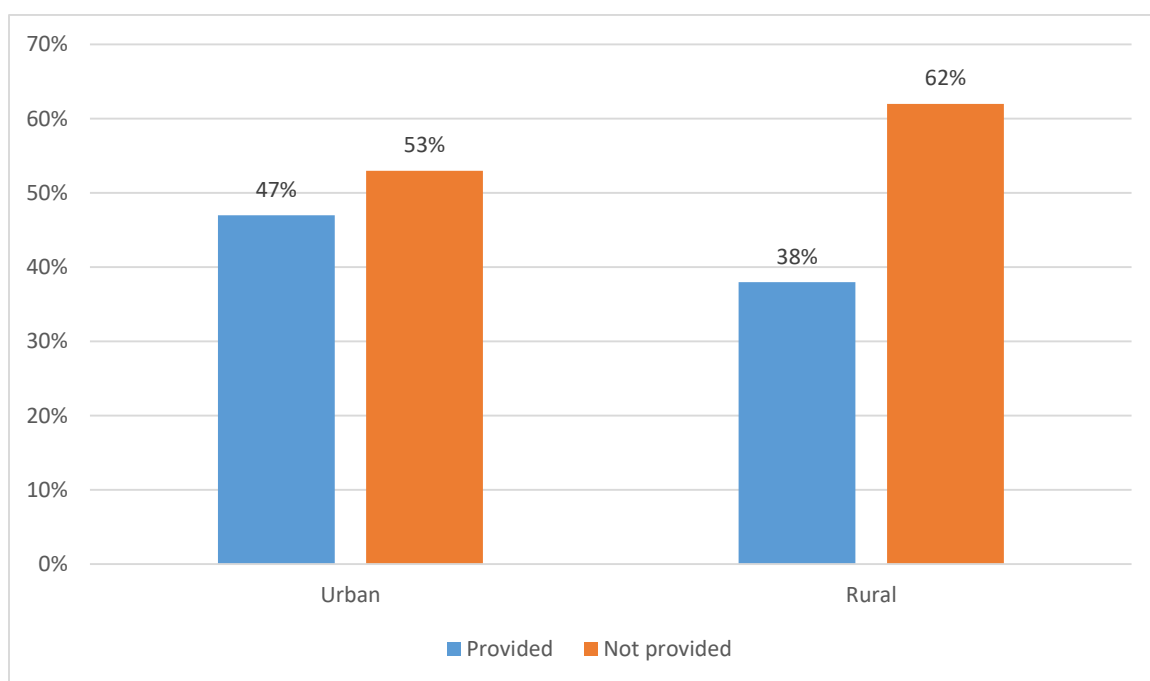
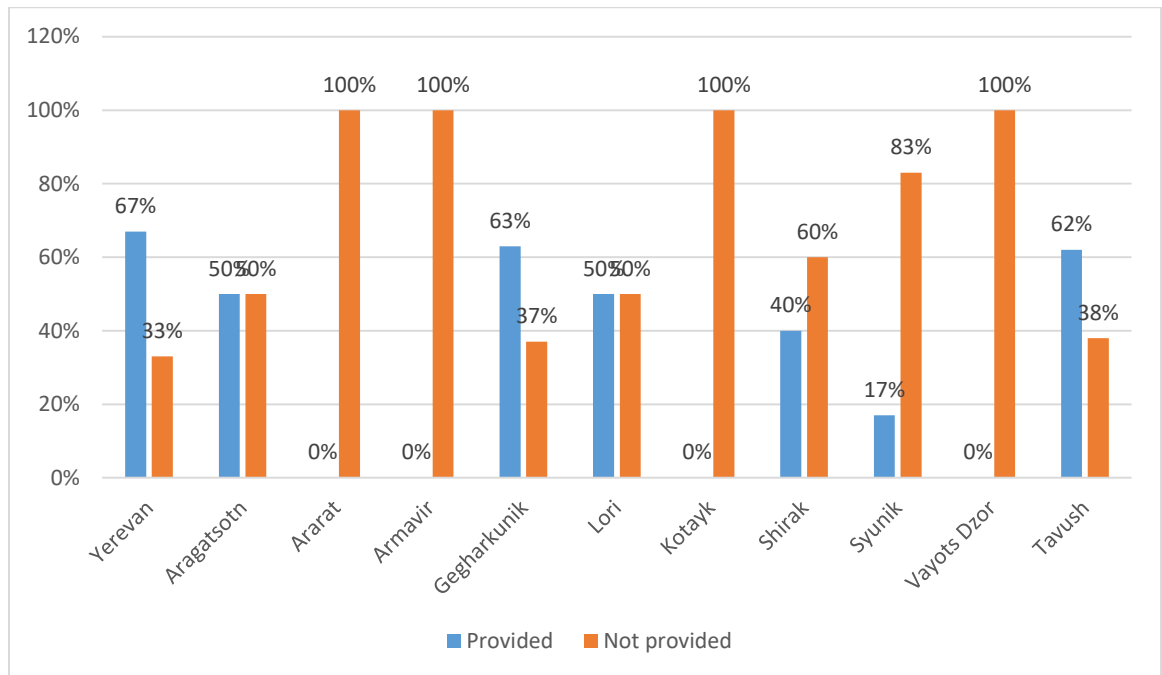


Table 60
Percentage Ratio of 80 Monitored Preschools by the Provision of the Buildings with Hot Water Supply

*Provision of the Buildings with Hot Water
Supply by the Regions of RA and Yerevan*



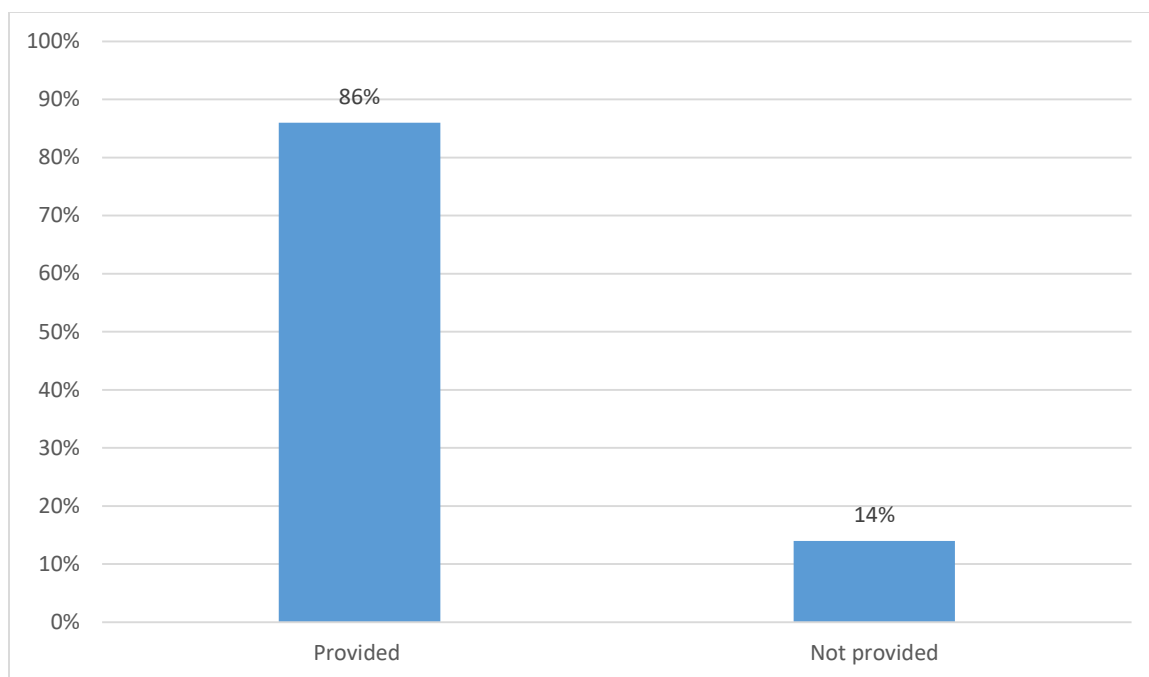
A special attention should be paid to the preschools of Ararat, Armavir, Kotayk and Vayots Dzor regions where all the studied institutions were not provided with hot water supply.

4.2. DRAINAGE SYSTEM. INTERNAL NET

The mandatory requirement of sanitary norms and rules for preschools defined by Order No 857 of the Minister of Health of RA is that the buildings of preschools should have a sewage system. Thus, the building of 1 (1%) out of the 80 preschools was not provided with sewerage system (Lori region), and 14 out of the 80 preschools (18%) were in unsewered settlements.

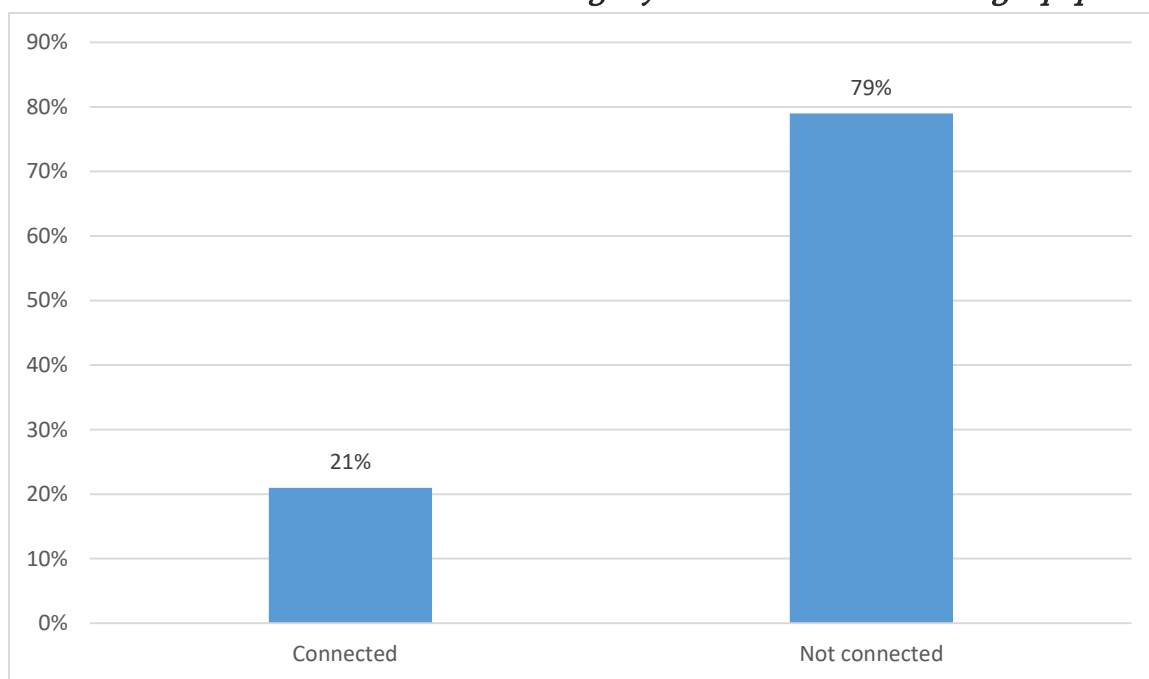
The preschools in unsewered areas should be provided with the internal sewerage system through the construction of local cleaning equipment. 12 (86%) out of the 14 studied preschools of the unsewered areas are provided with internal sewerage system.

Table 61
*Percentage Ratio of 14 Monitored Preschools by the
Provision of the Buildings with Internal Sewerage System*



The sewage system of the 3 (24%) out of the 14 monitored preschools of the unsewered areas are connected to the local cleaning equipment.

Table 62
Percentage Ratio of 14 Monitored Preschools by Being Connected to the Sewage System to the Local Cleaning Equipment



13 (16%) out of 80 preschools were constructed by non-standard design.

The mandatory requirement defined by Order No 857 of the Minister of Health of RA for the buildings constructed by non-standard design is to envisage centralized water supply equipment, which will provide the showers and washbasins with 37° water. In 7 (54%) out of 13 preschools (3 in urban and 10 in rural communities), are provided with centralized water supply equipment, which supply the washbasins with hot water.

Table 63
Percentage Ratio of 13 Monitored Preschools by the Provision with Centralized Water Supply Equipment

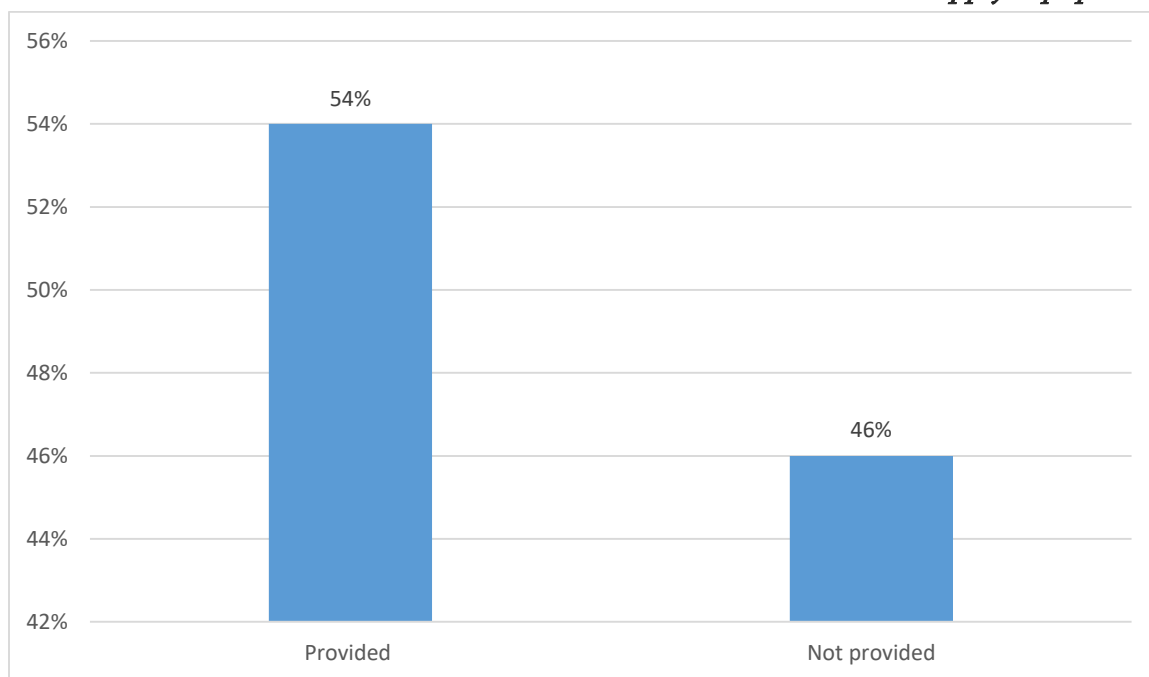
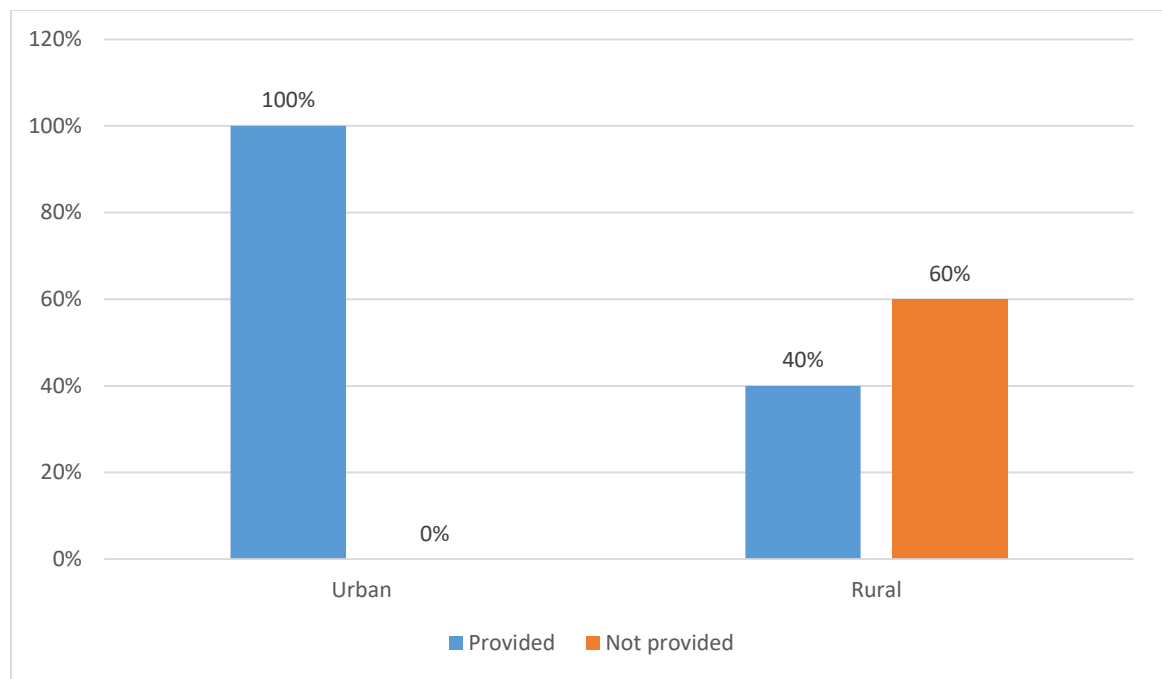


Table 64
Percentage Ratio of 13 Monitored Urban and Rural Preschools by the Provision with Centralized Water Supply Equipment



Thus, the buildings of preschools constructed by non-standard designs are not provided with centralized hot water supply equipment exclusively in rural communities.

4.3. DRINKING WATER QUALITY

The compliance of the quality of drinking water, supplied to the organization, with the sanitary rules and norms of RA is a mandatory requirement of sanitary rules and norms submitted to the preschools of the Republic of Armenia. During the monitoring, this index was also studied through oral enquiries as not all the schools, especially those located in cities, are included in the list of drinking water quality control points. In the result, it turned out that 10 (13%) out of the 80 preschools participated in the study have complaints about the quality of the supplied drinking water.

Table 65

Percentage Ratio of 80 Monitored Preschools by Having Complaints about the Quality of the Supplied Drinking Water

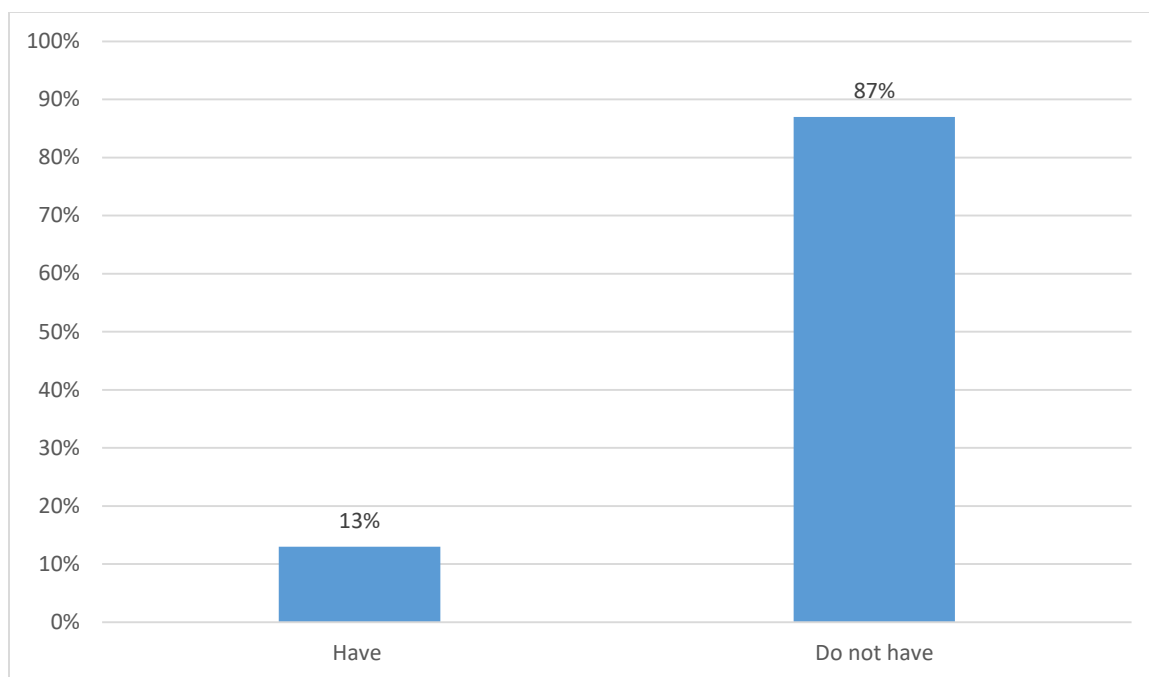
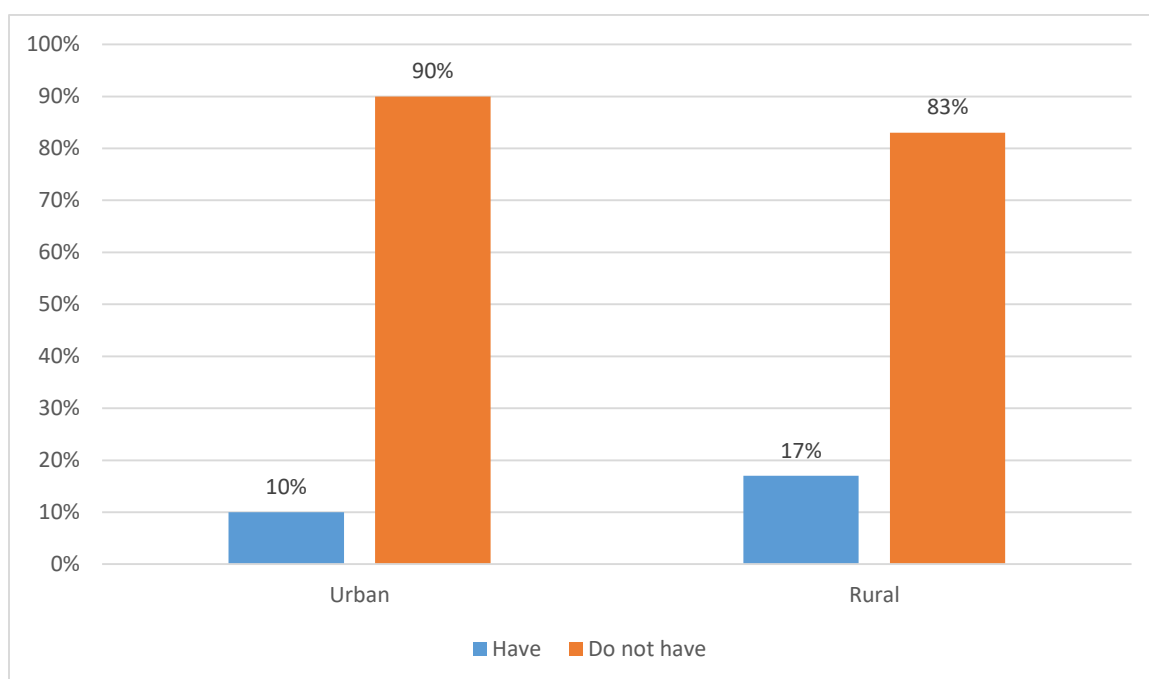


Table 66
Percentage Ratio of 80 Monitored Urban and Rural Preschools by Having Complaints about the Quality of the Supplied Drinking Water



The complaints received from 5 urban and 5 rural communities about the quality of drinking water mainly concerned the water sensitivity indicators.

4.4. DRINKING WATER ACCESSIBILITY

Drinking water accessibility is also of great significance for children of preschool institutions conditioned with different ways of drinking water use. It is of great significance in terms of infection detection and risk management among the children.

Children drink water from individual cups or bottles in 59 (74%) out of the 80 studied preschools. It is also worth mentioning that individual cups or bottles are mainly differentiated by pictures of animals or fruits and according to the kindergartners, each child knows his marking. However, this form of differentiation is also risky in terms of spread of infections. Children can easily drink from each other's bottle because the bottles are mainly identical and the markings are confusing.

Table 67
Percentage Ratio of 80 Monitored
Preschools by the Children's Water Drinking Ways

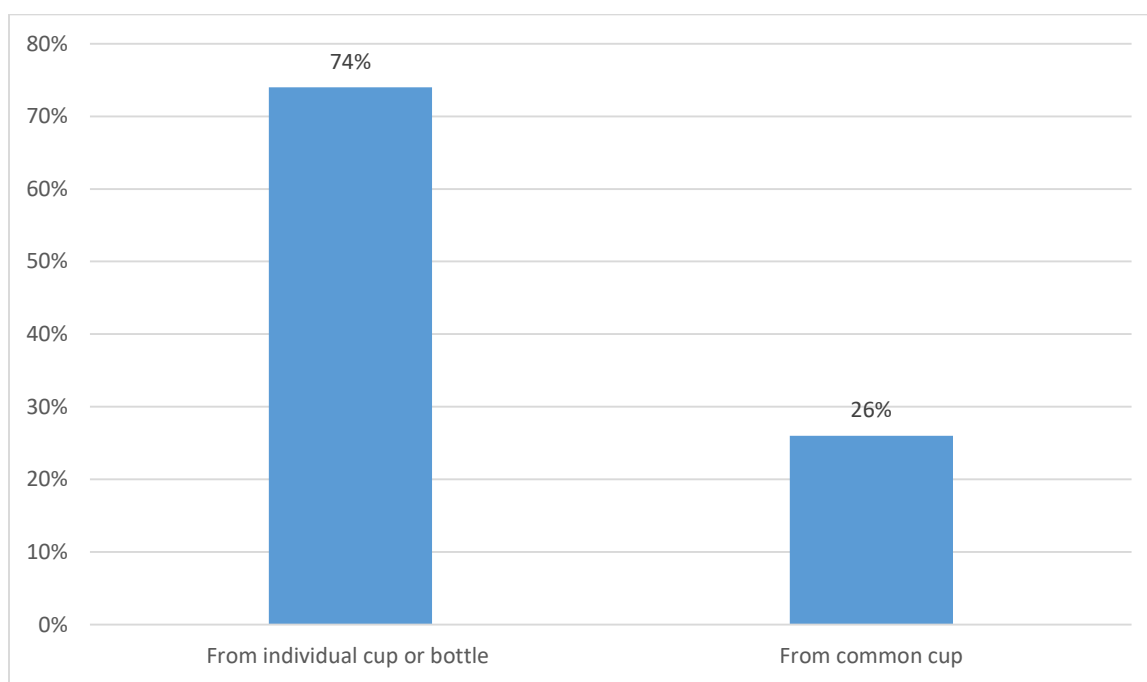
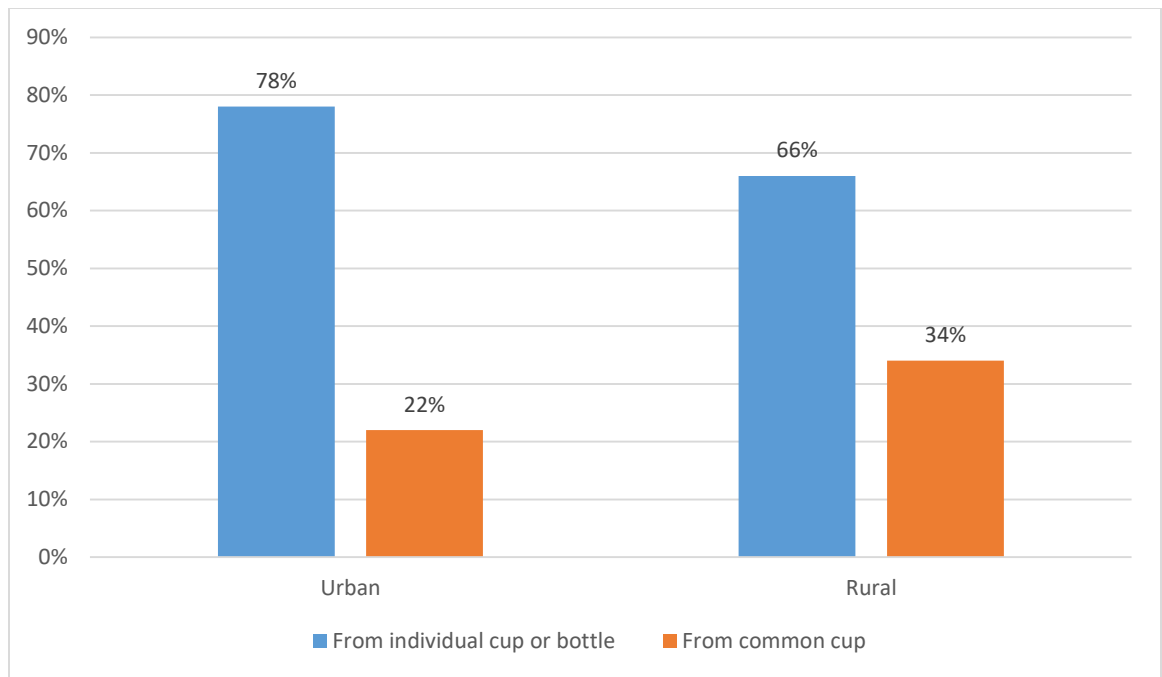
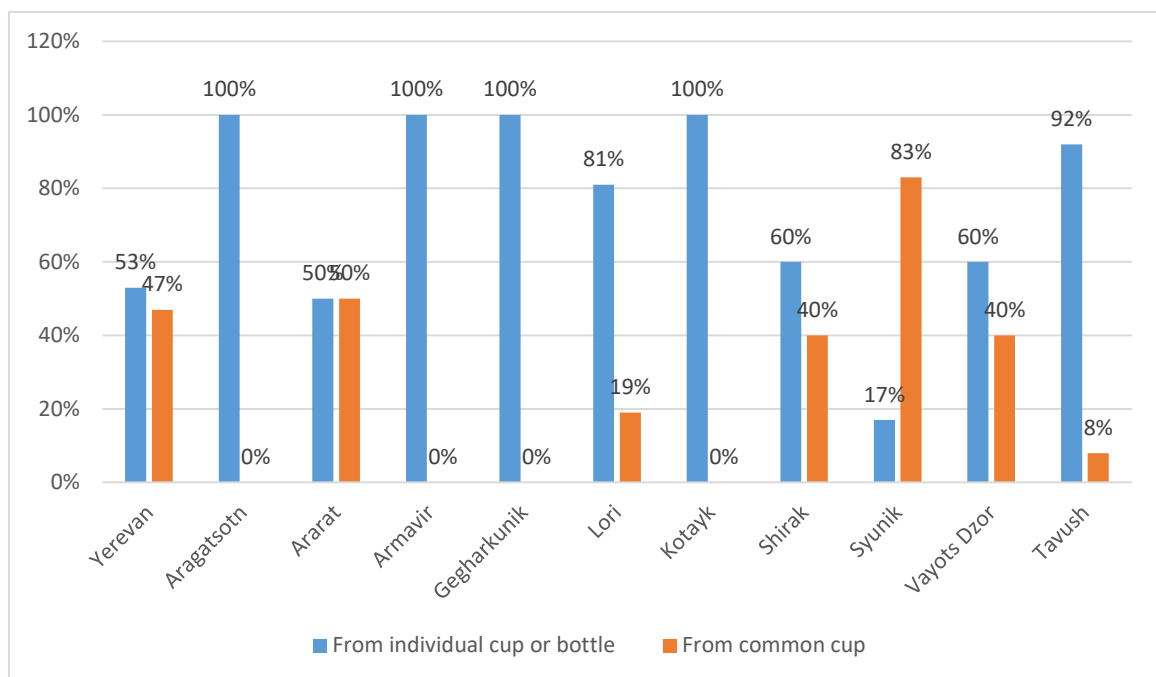


Table 68
Percentage Ratio of 80 Monitored Urban and Rural
Preschools by the Children's Water Drinking Ways



The presented data testify that the probability of spread of infections among children is higher in the rural communities (34%) unlike the urban communities (22%).

Table 69
Percentage Ratio of 80 Monitored Preschools by the
Children's Water Drinking Ways by the Regions of RA and Yerevan

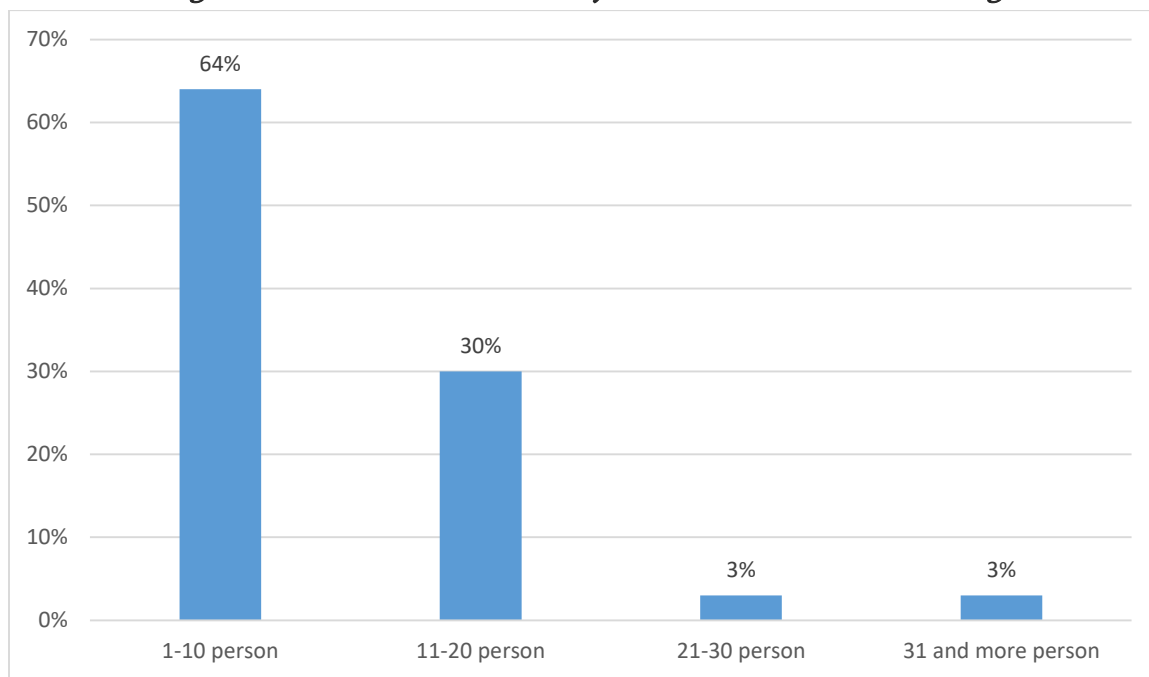


The presented data testify that the common cups are mostly used in Syunik (83%), Ararat (50%), Yerevan (47%), Shirak (40%) and Vayots Dzor (40%) regions, relatively less in Lori (19% and Tavush (8%) regions.

During the monitoring, an indicator was studied which allows to estimate as how many persons make use of a faucet, which is significant in terms of drinking water accessibility. In the result of the study, it turned out that 31 and more persons make use of one faucet only in 2 (3%) out of the 80 studied institutions (in Aragatsotn and Syunik regions).

Table 70

Percentage Ratio of the 80 Preschools by the Number of Persons Using One Faucet



4.5. DRINKING WATER AMOUNT

An indicator was also studied which allows to reveal the amount of water used per person per day in the preschools. The abovementioned indicator was calculated in 58 (72%) out of the 80 preschool participated in the study, and it was impossible to calculate the amount of water used per person per day in 22 (28%) preschools due to lack of water meters. The data is presented in the tables.

Table 71

Percentage Ratio of 58 Preschools by the Amount of Water Falling to per Person Share

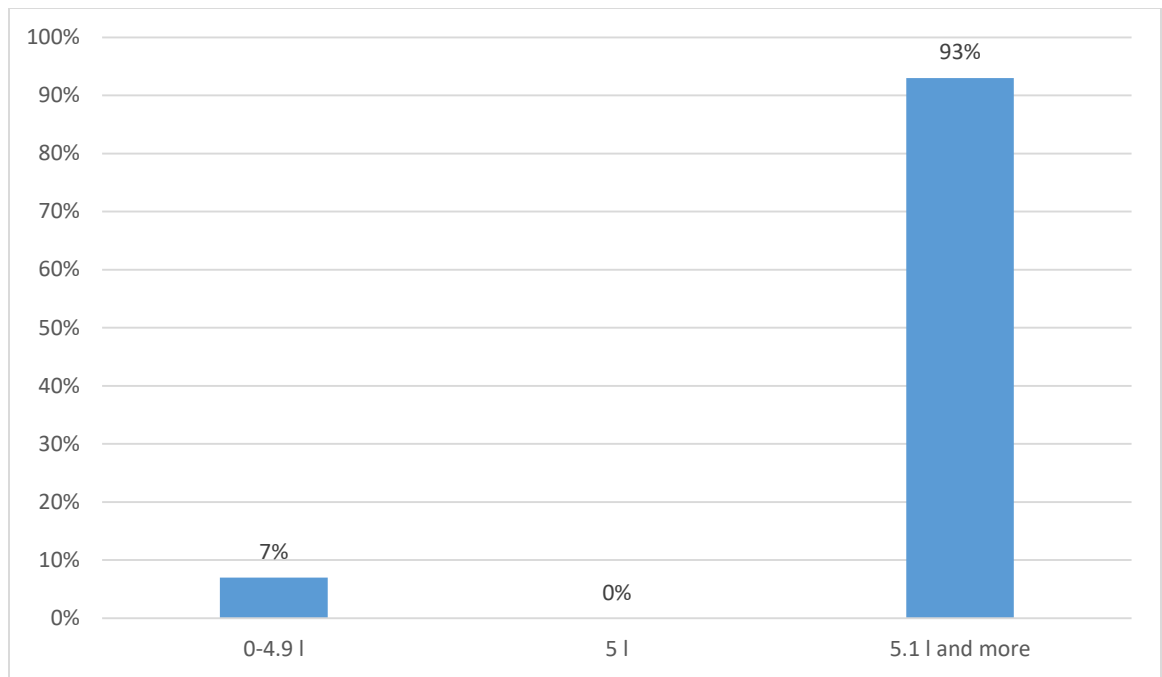
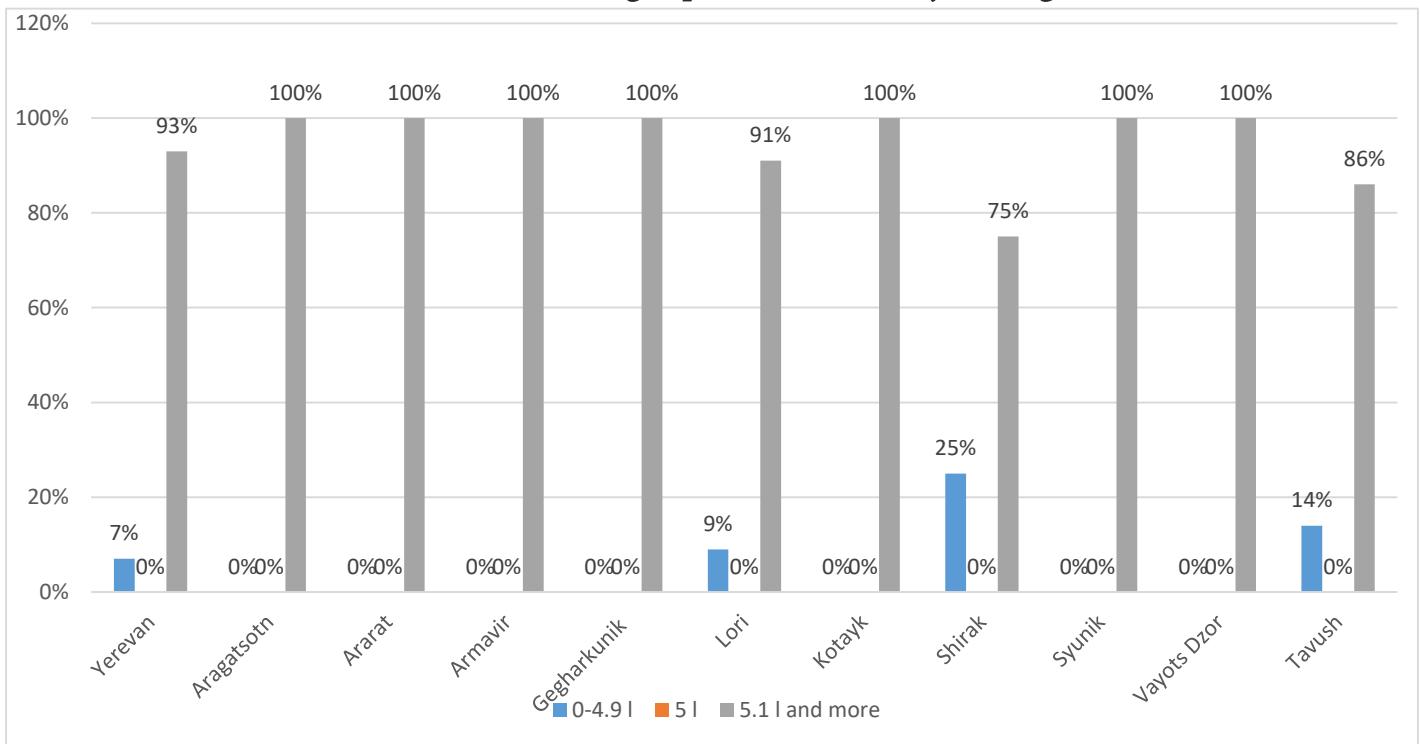


Table 72
Percentage Ratio of 58 Preschools by the
Amount of Water Falling to per Person Share by the Regions of RA and Yerevan



The highest indicators were recorded in Shirak (25%), Tavush (25%) regions, and relatively less in Lori (9%) region and in Yerevan (7%).

The distribution of the indicator of 0-4.9 liters is equal in the urban and rural settlements.

Table 73

Percentage Ratio of 80 Monitored Preschools by Water Cuts per Year

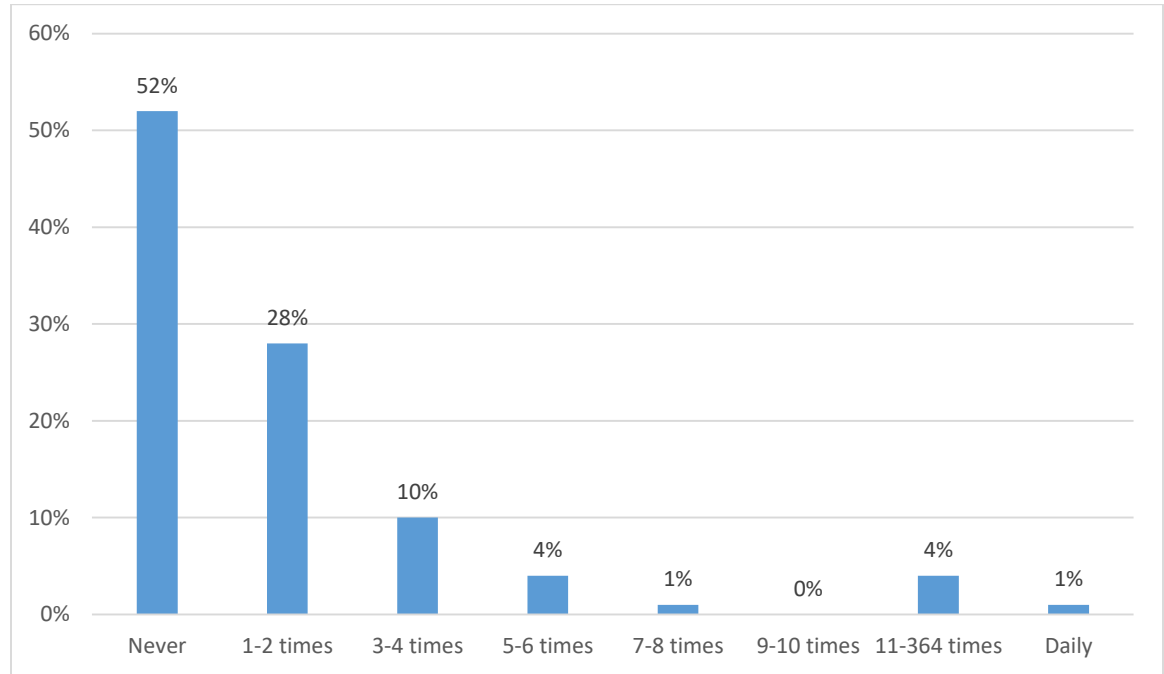


Table 74

Percentage Ratio of 74 Monitored Preschools by the Availability of the Nearby Tap in Case of Water Lack in the Institution

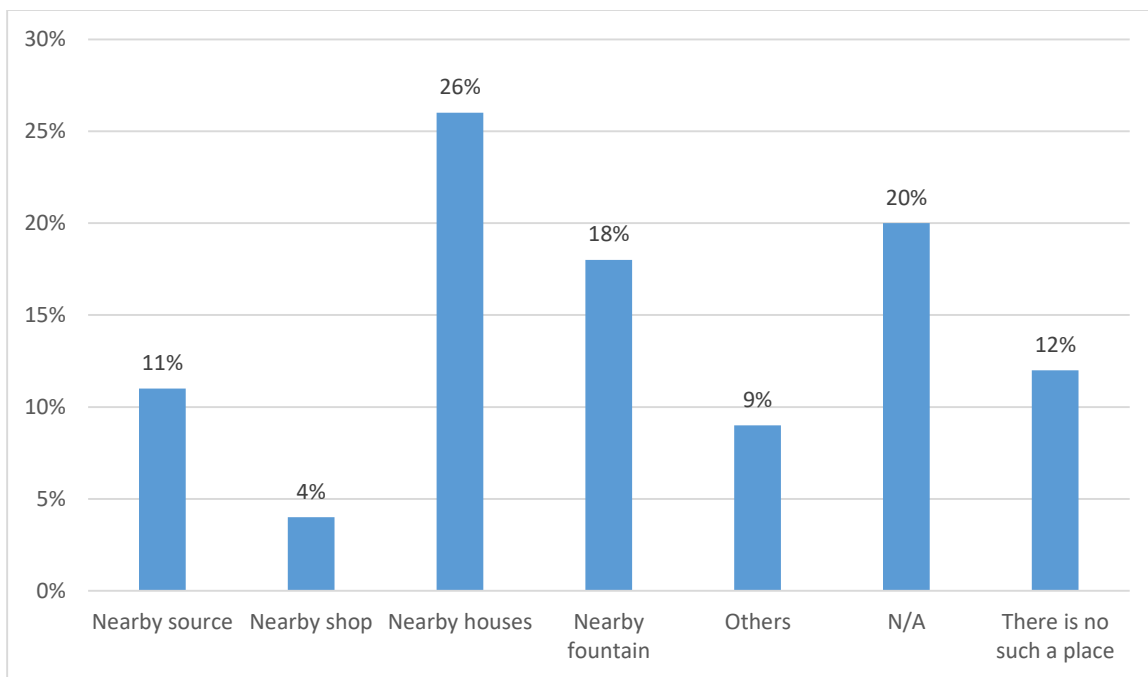


Table 75
Percentage Ratio of 80 Monitored Urban and Rural Preschools by Yearly Water Cuts

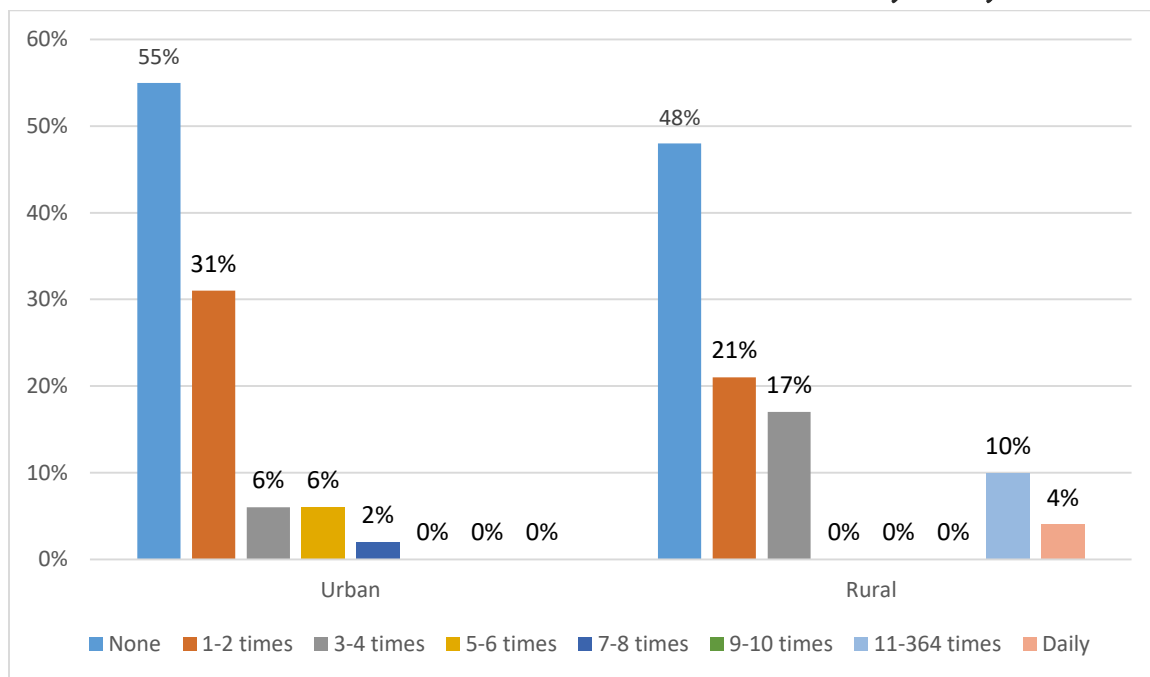


Table 76
Percentage Ratio of 80 Monitored Preschools by Yearly Water Cuts by the Regions of RA and Yerevan 1

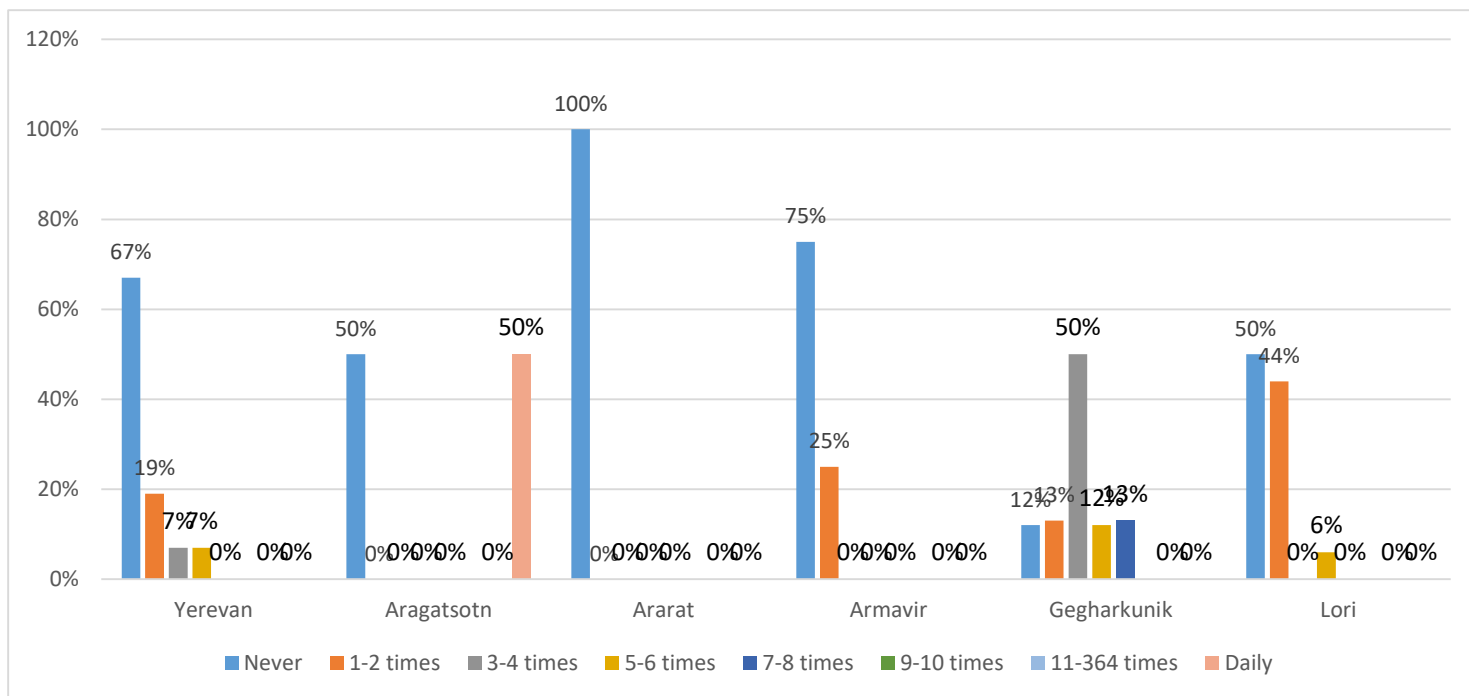
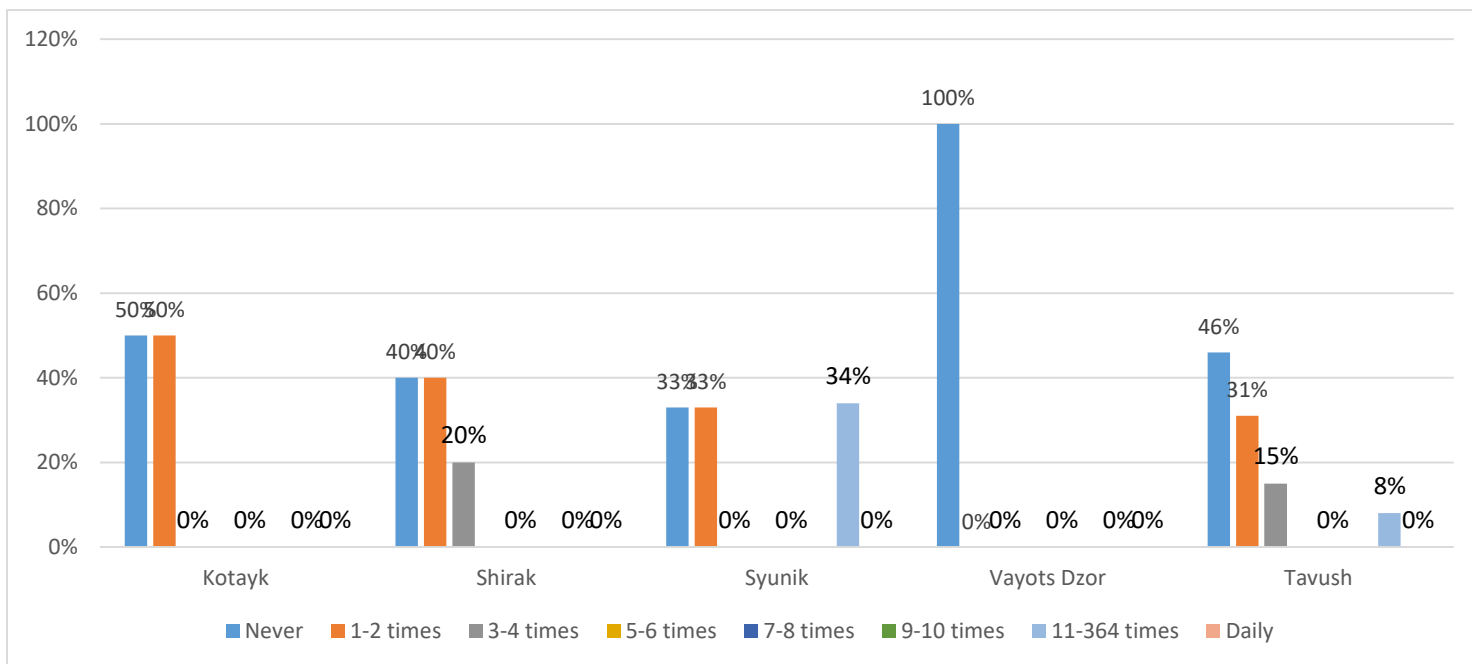


Table 77
Percentage Ratio of 80 Monitored
Preschools by Yearly Water Cuts by the Regions of RA and Yerevan 2



4.6. HYGIENE PROCEDURES CONDITIONS

According to Order No 857 of the Minister of Health of RA, kitchen, laundry, the tender age children playrooms (the 1st group), the buffet sections of all the groups and toilets with the availability of mixer taps should necessarily be provided with hot water supply.

Tender age children playrooms were available in 51 (64%) out of the 80 preschools participated in the study, only 19 of which (37%) were provided with hot water supply. At that, tender age children playrooms (the 1st group) in the 72% of cases in the preschools of the rural communities were not provided with hot water supply. The buffet sections of all the groups were not provided with hot water supply in the 53% of cases of the 70 preschools participated in the study.

Table 78
Percentage Ratio of 51 Monitored Preschools by the Provision of the Tender Age Children (the 1st group) Playrooms with Hot Water Supply

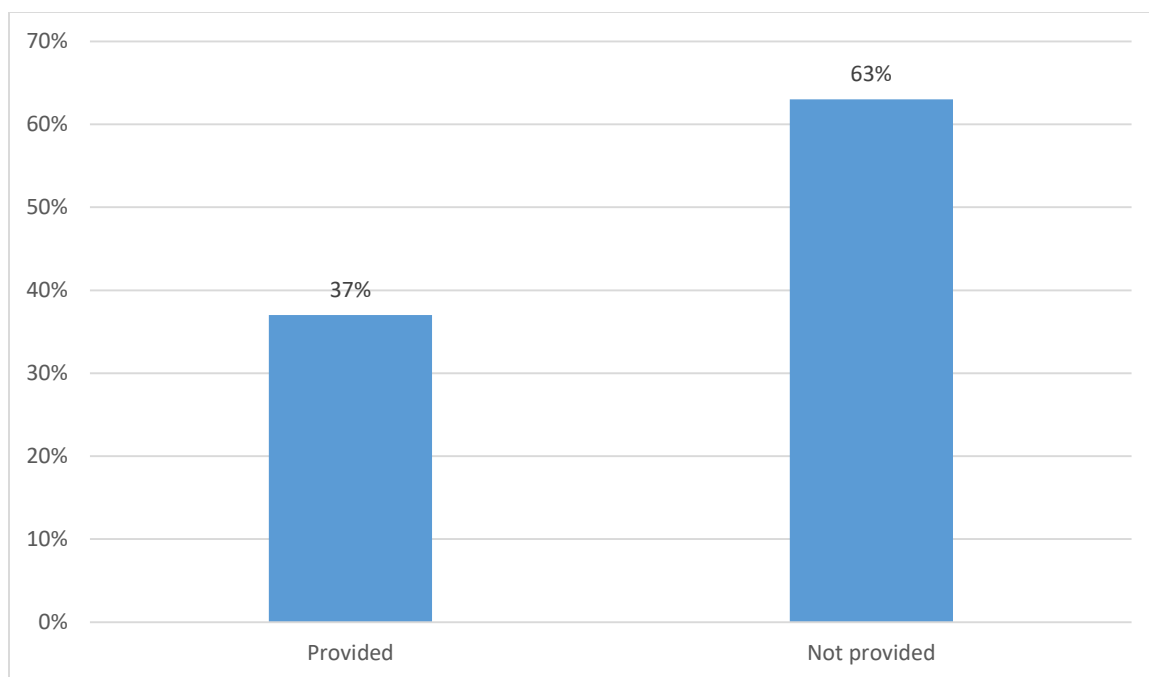


Table 79
*Percentage Ratio of 51 Monitored Rural and Urban Preschools by the
 Provision of the Tender Age Children (the 1st group)
 Playrooms with Hot Water Supply*

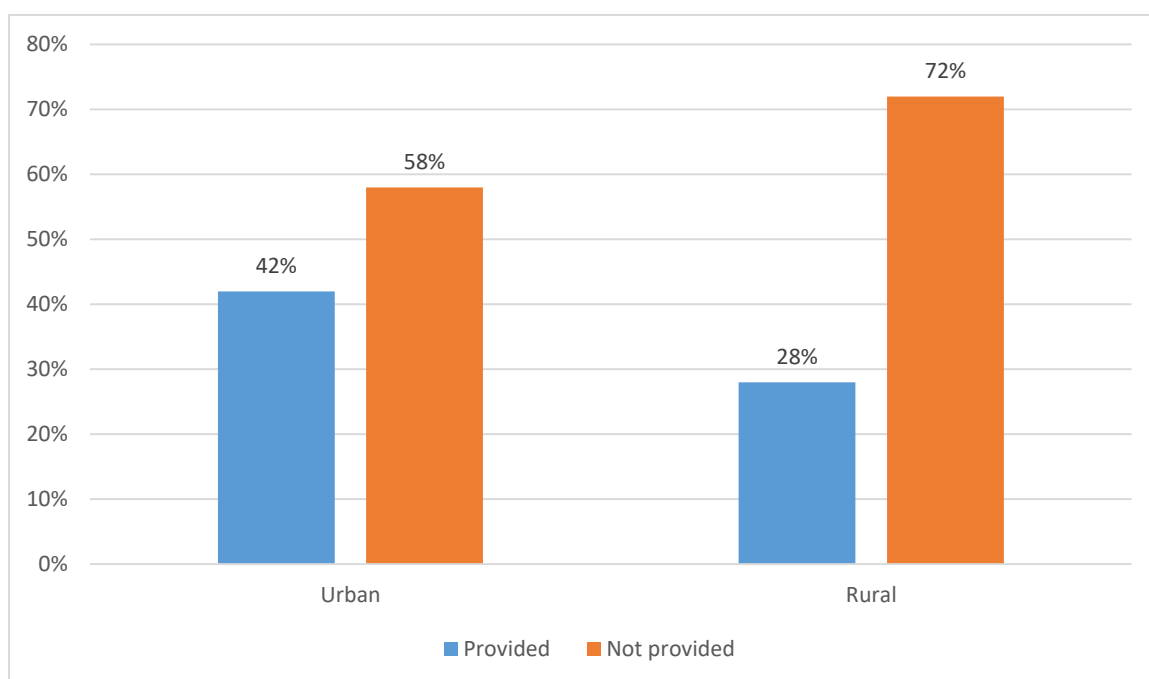
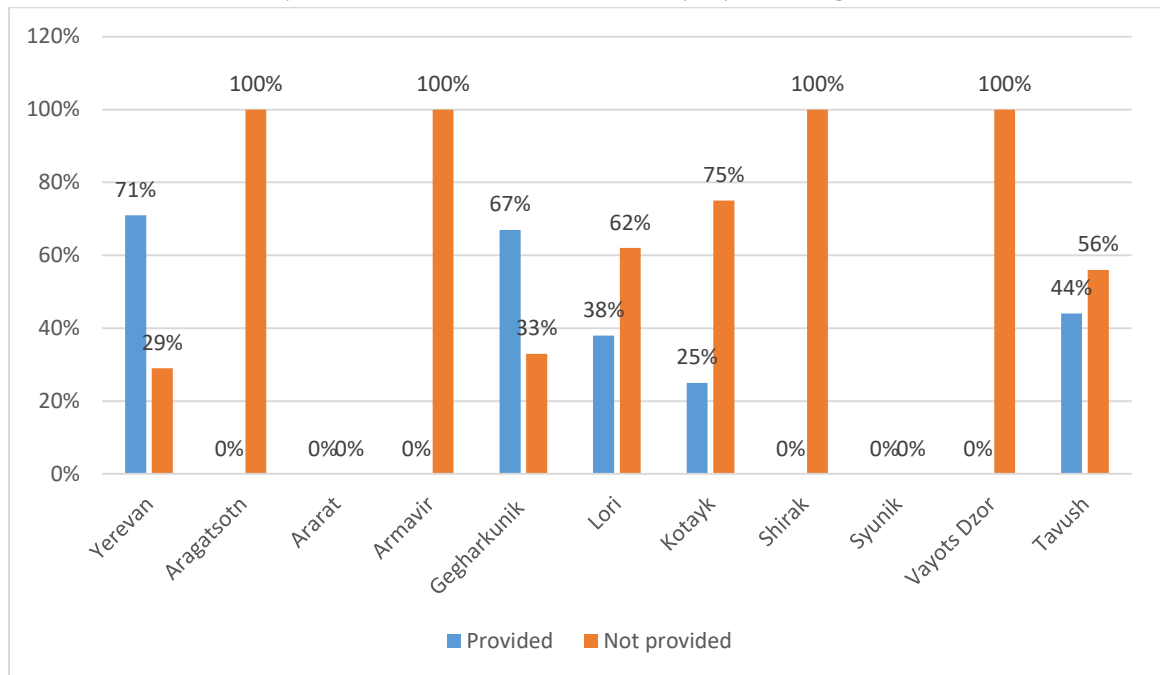


Table 80

Percentage Ratio of 51 Monitored Preschools by the Provision of the Tender Age Children (the 1st group) Playrooms with Hot Water Supply by the Regions of RA and Yerevan



It is clear from the data that the problem of lack of hot water supply is more common in the rural communities (72%), although the indicator is also high (58%) in the urban settlements. The worst situation is in Aragatsotn, Armavir, Shirak and Vayots Dzor regions, where the index is 100%.

All the groups of 70 (88%) out of 80 preschools had buffet sections, 33 of which were provided with hot water supply.

Table 81
Percentage Ratio of 80 Monitored Preschools by Having Buffet Sections in All the Groups

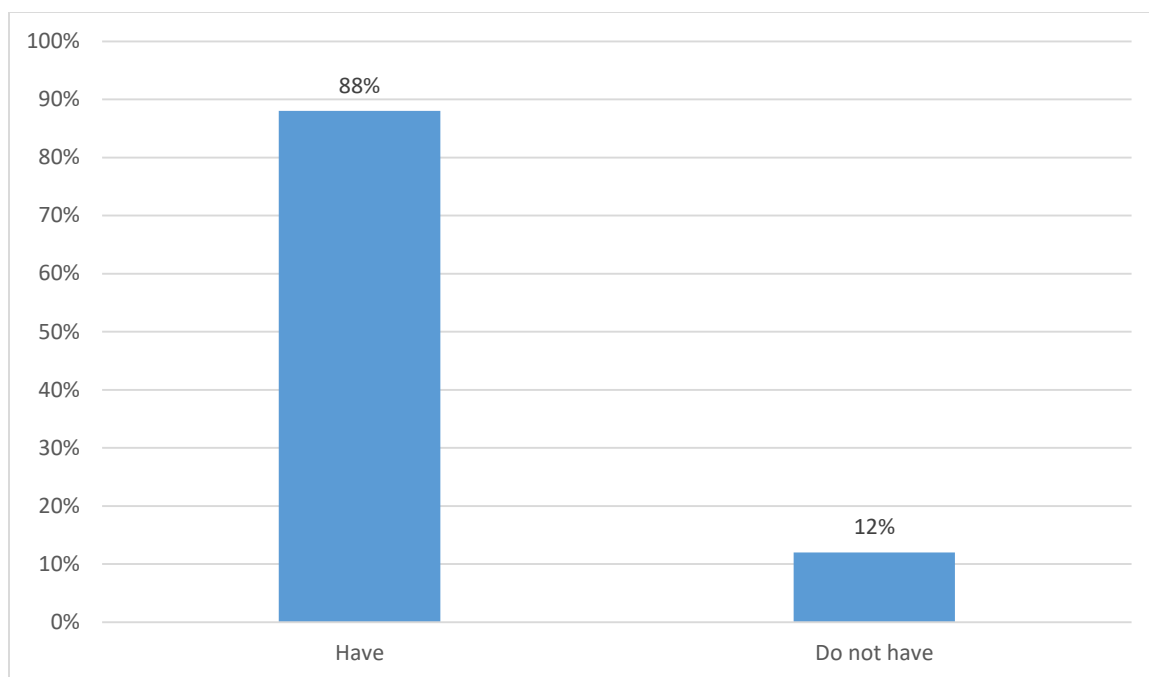


Table 82
Percentage Ratio of 70 Monitored Preschools by the Provision with Hot Water Supply of Buffet Sections of All the Groups

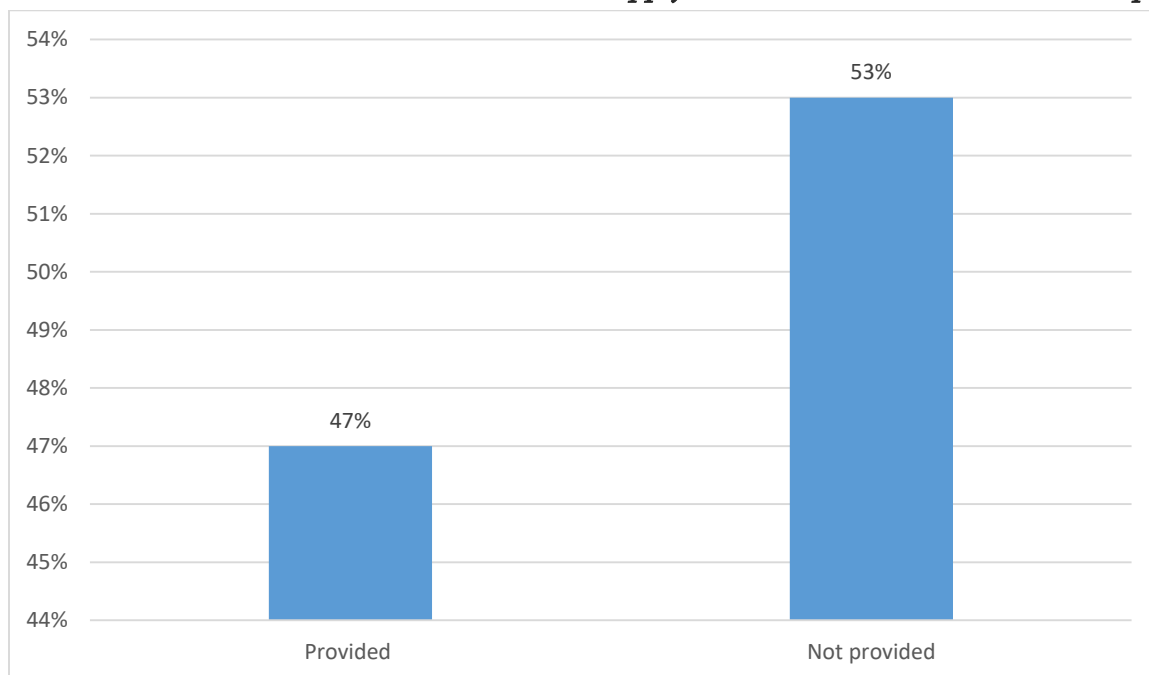


Table 83
Percentage Ratio of 70 Monitored Urban and Rural Preschools by the Provision with Hot Water Supply of Buffet Sections of All the Groups

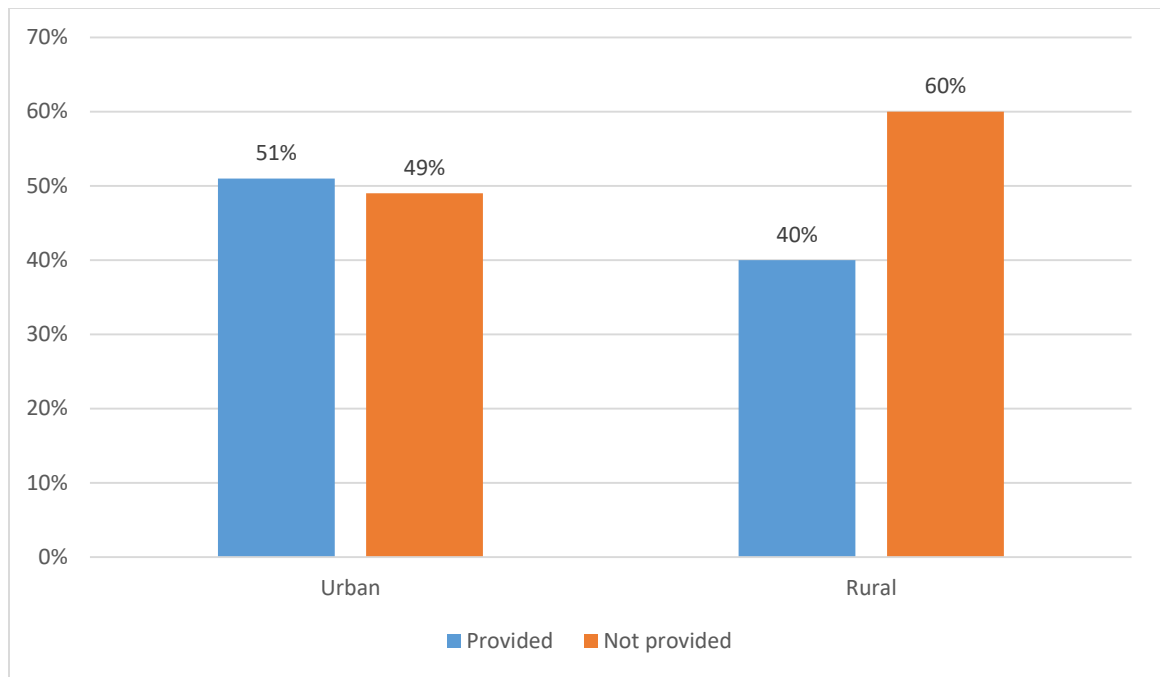
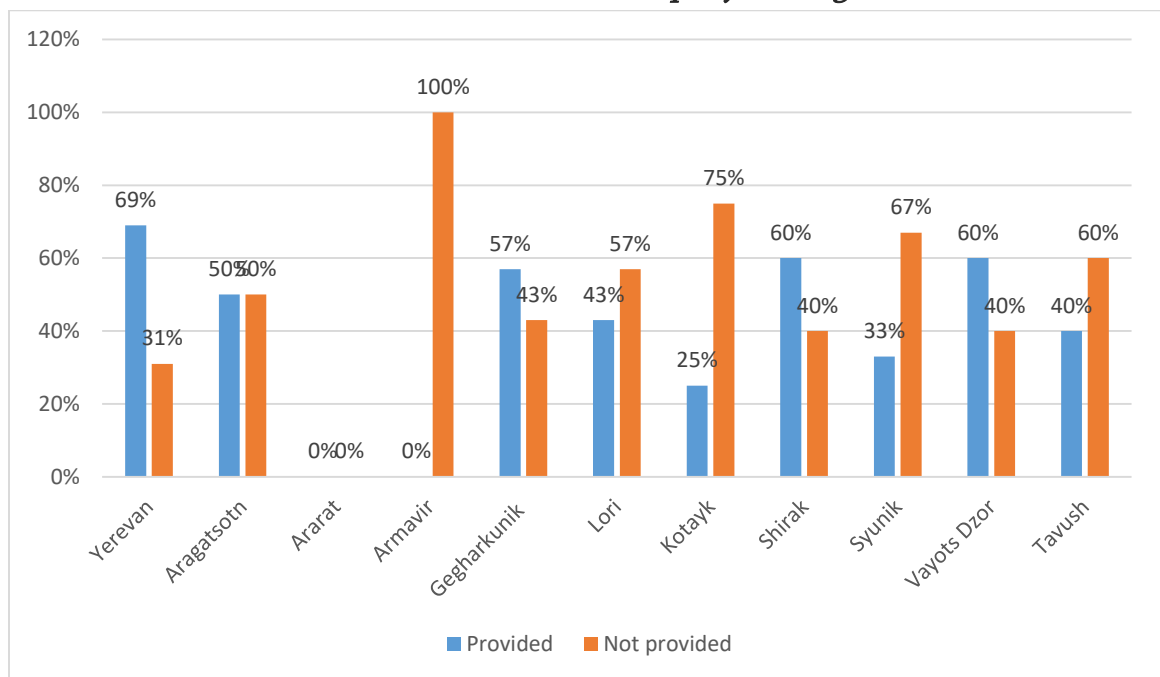


Table 84
Percentage Ratio of 70 Monitored Preschools by the Provision with Hot Water Supply of Buffet Sections of All the Groups by the Regions of RA and Yerevan



Data analysis shows that the lack of hot water supply in the buffet sections is more common in the rural communities (60%), and it is almost equal in the urban settlements (49% do not have). The situation is worse in Armavir (100%), Kotayk (75%), Syunik (67%) and Tavush (60%) regions.

The toilets of 27 (34%) out of the 80 monitored preschools were provided with hot water supply. The latter is a significant indicator in terms of the accessibility of sanitary conditions and hygiene.

Table 85
Percentage Ratio of 80 Monitored Preschools by the Provision of Toilets with Hot Water Supply

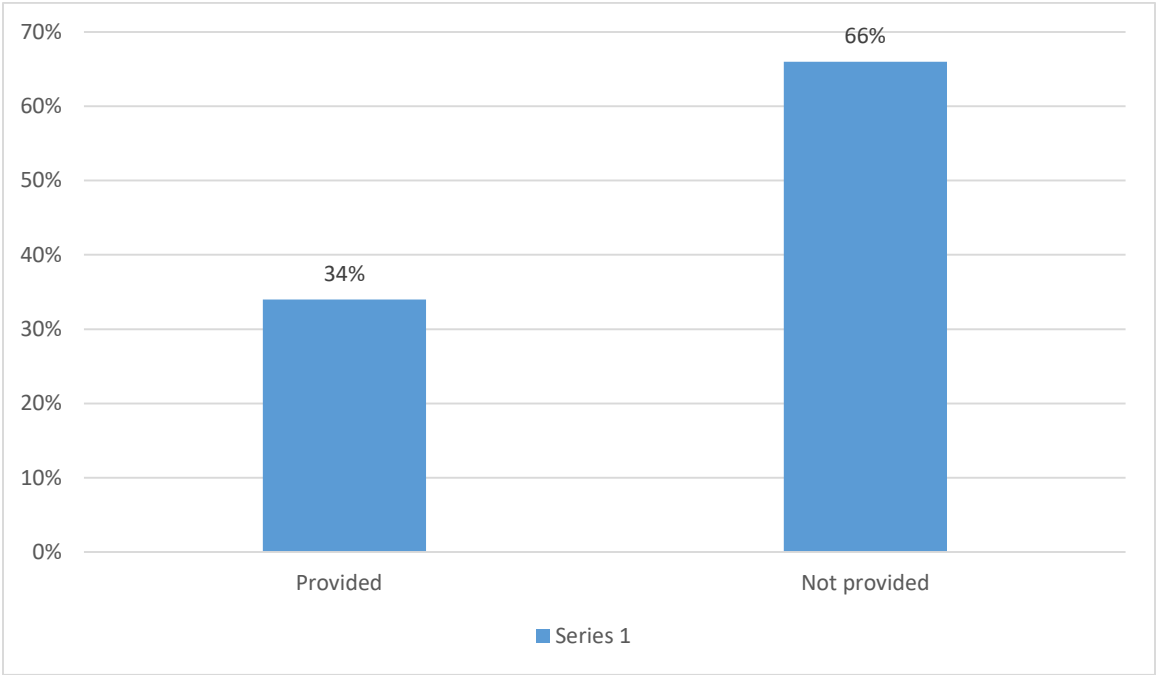


Table 86
Percentage Ratio of 80 Monitored Urban and Rural Preschools by the Provision of Toilets with Hot Water Supply

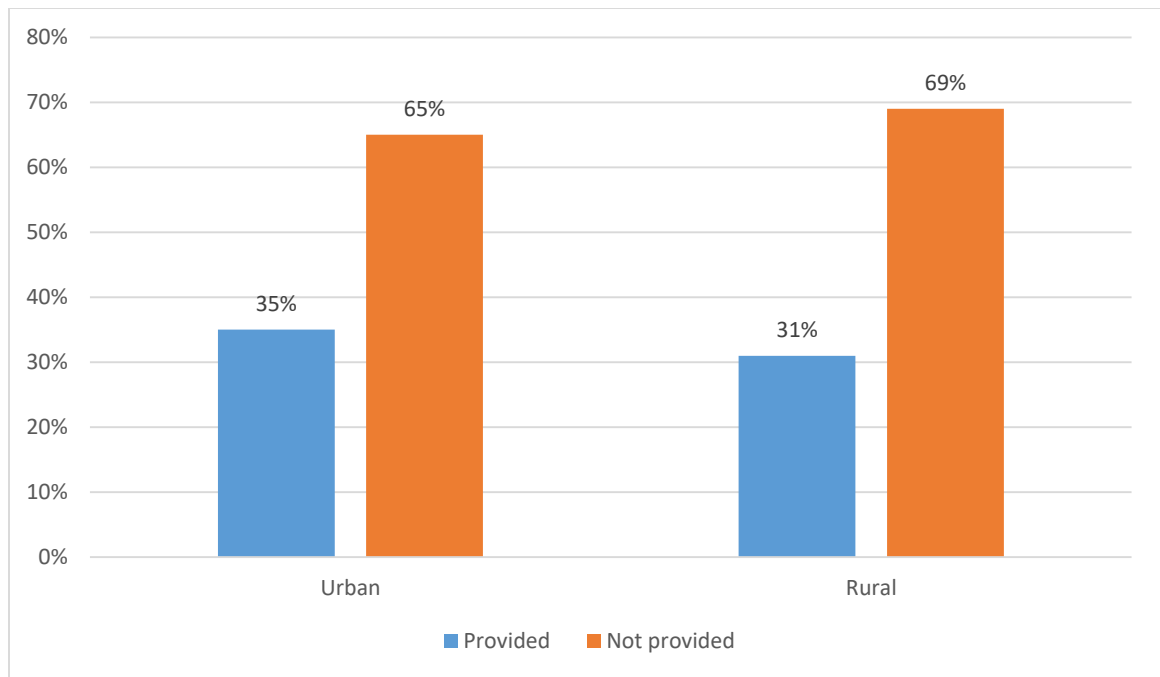
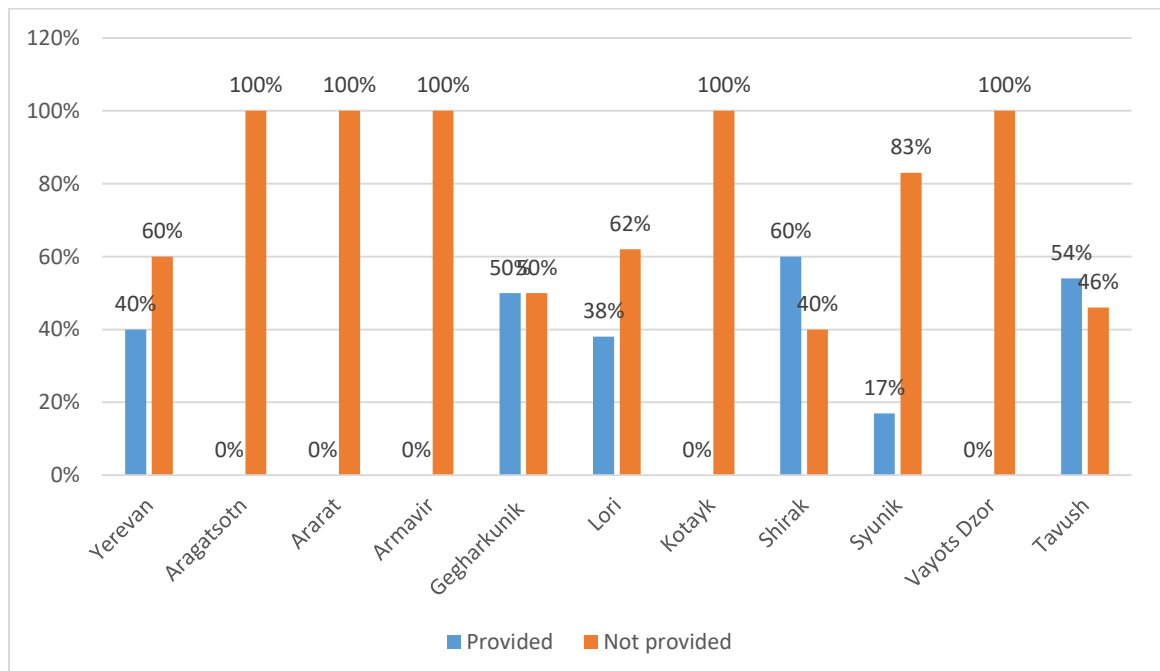


Table 87
Percentage Ratio of 80 Monitored Preschools by the Provision of Toilets with Hot Water Supply by the Regions of RA and Yerevan



The provision of toilets with hot water supply in the urban (65%) and rural (69%) settlements is almost equal, and there is lack of hot water in the toilets of the studied preschools in Aragatsotn, Ararat, Armavir, Kotayk and Vayots Dzor regions (100%).

The showers and washbasins are connected to hot water (above 37°) in 28 (35%) out of the 80 studied preschools.

Table 87.1
Percentage Ratio of 80 Monitored Preschools by the Provision with Connected Hot Water (above 37°) to Showers and Washbasins

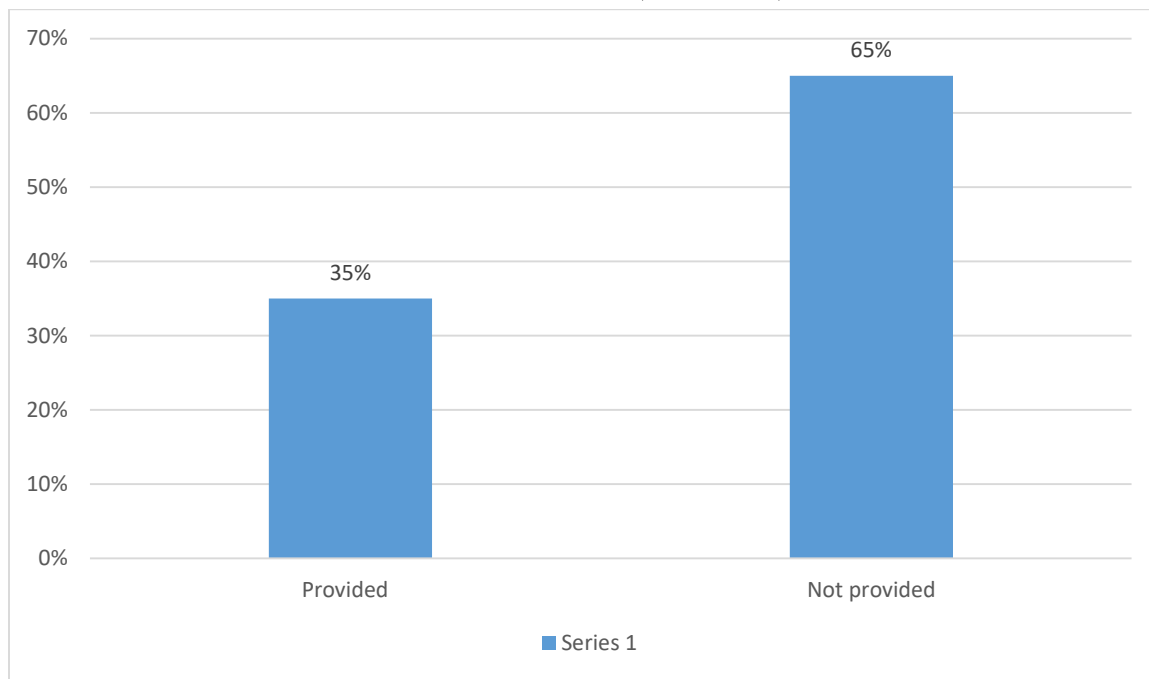


Table 88
Percentage Ratio of 80 Monitored Urban and Rural Preschools by the Provision with Connected Hot Water (above 37°) to Showers and Washbasins

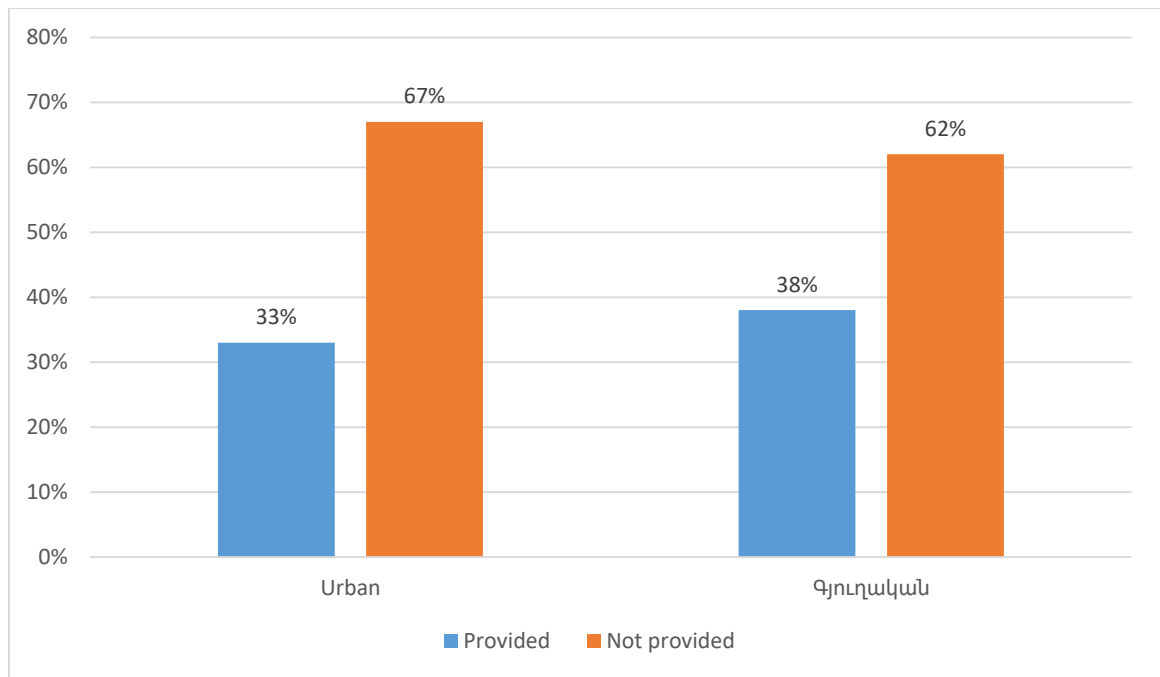
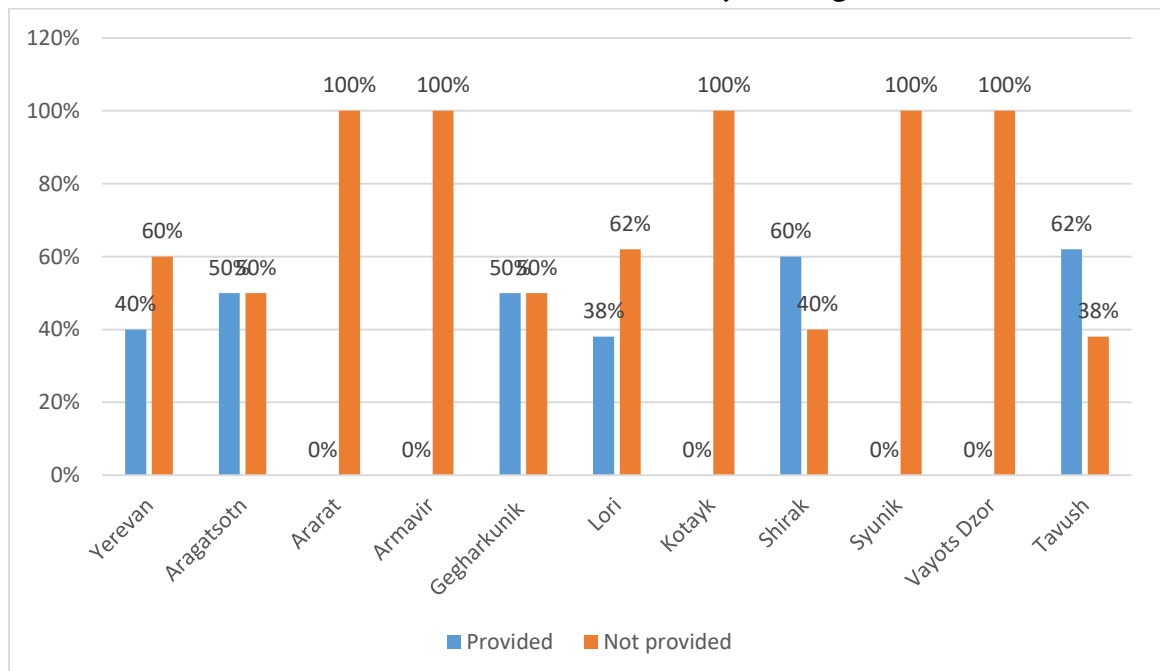


Table 89
Percentage Ratio of 80 Monitored Preschools by the Provision with Connected Hot Water (above 37°C) to Showers and Washbasins by the Regions of RA and Yerevan



According to Order No 857 of the Minister of Health of RA the group section for preschool-age children consists of a cloakroom, group room, bedroom (a bedroom-balcony), toilet and a buffet

section, which is located in the group room area. Thus, there were groups for preschool-age children in 72 (90%) out of the 80 monitored preschools, of which 58 (81%) were provided with toilets, and in 14 (19%) there were shared toilets. The availability of this data is very significant in terms of the accessibility of sanitary and hygienic conditions.

Table 90
Percentage Ratio of 72 Monitored Urban and Rural Preschools by the Provision with Toilets in Preschool-age Children Groups

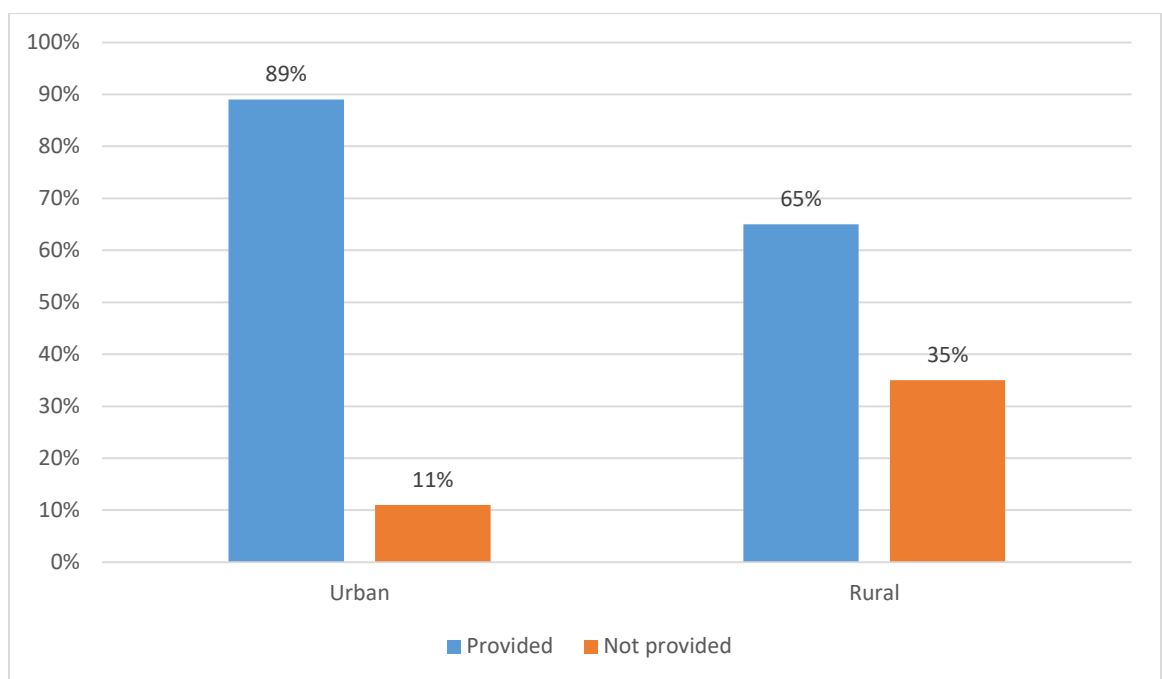
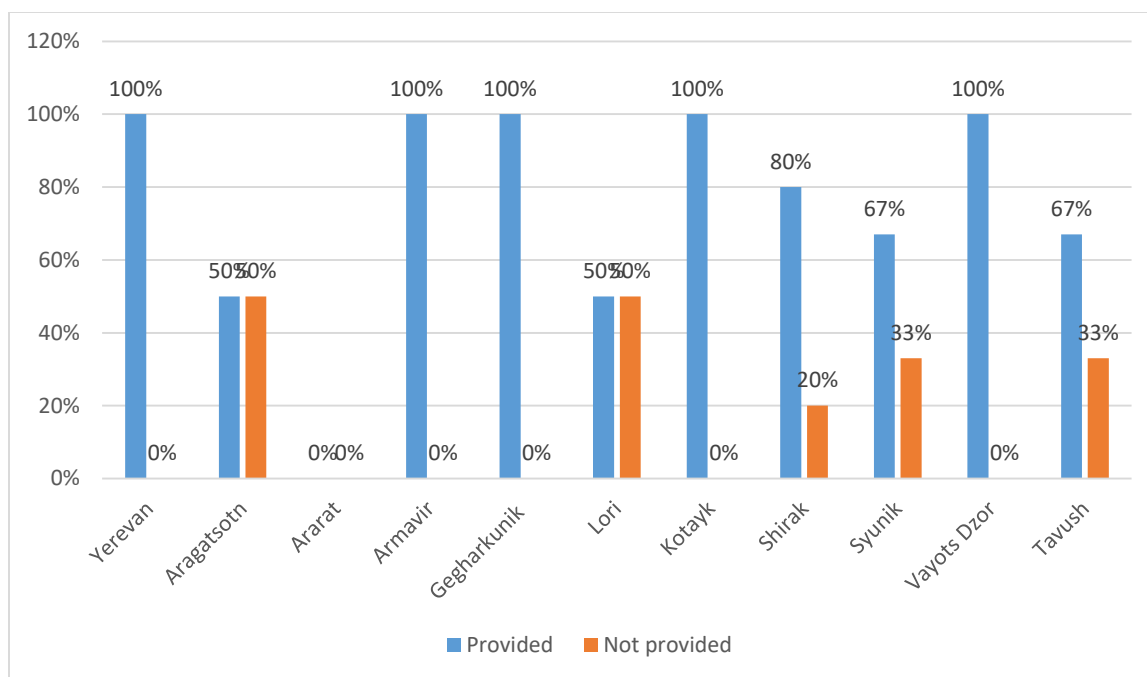


Table 91
Percentage Ratio of 72 Monitored Preschools by the Provision with Toilets in Preschool-age Children Groups by the Regions of RA and Yerevan



In the result of the data analysis, it turned out that the lack of toilets for children in pre-school age groups is most common in the rural communities (35%) and is widespread in Aragatsotn (50%), Lori (50%), Syunik (33%), Tavush (33%) Shirak (20%) regions.

According to Order No 857 of the Minister of Health, the adult and preparatory groups should have separate toilets for girls and boys, 4 toilet bowls, 4 washbasins, 1 shower plate, 1 towel. There were adult and preparatory groups in 75 (94%) out of the 80 studied preschools, of which 40 (53%) were provided with separate toilets for boys and girls.

Table 92
Percentage Ratio of 75 Studied
Preschools by the Provision with Separate Toilets for
Girls and Boys in the Adult and Preparatory Groups

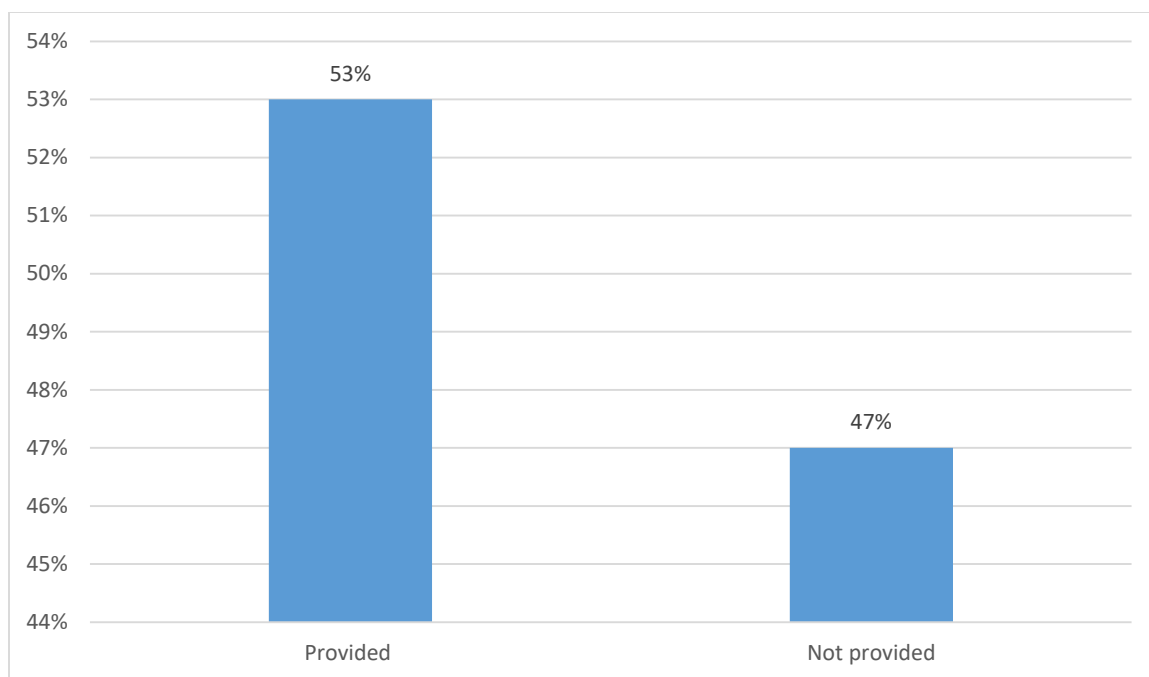


Table 93
Percentage Ratio of 75 Monitored Urban and Rural Preschools by the Provision with Separate Toilets for Girls and Boys in the Adult and Preparatory Groups

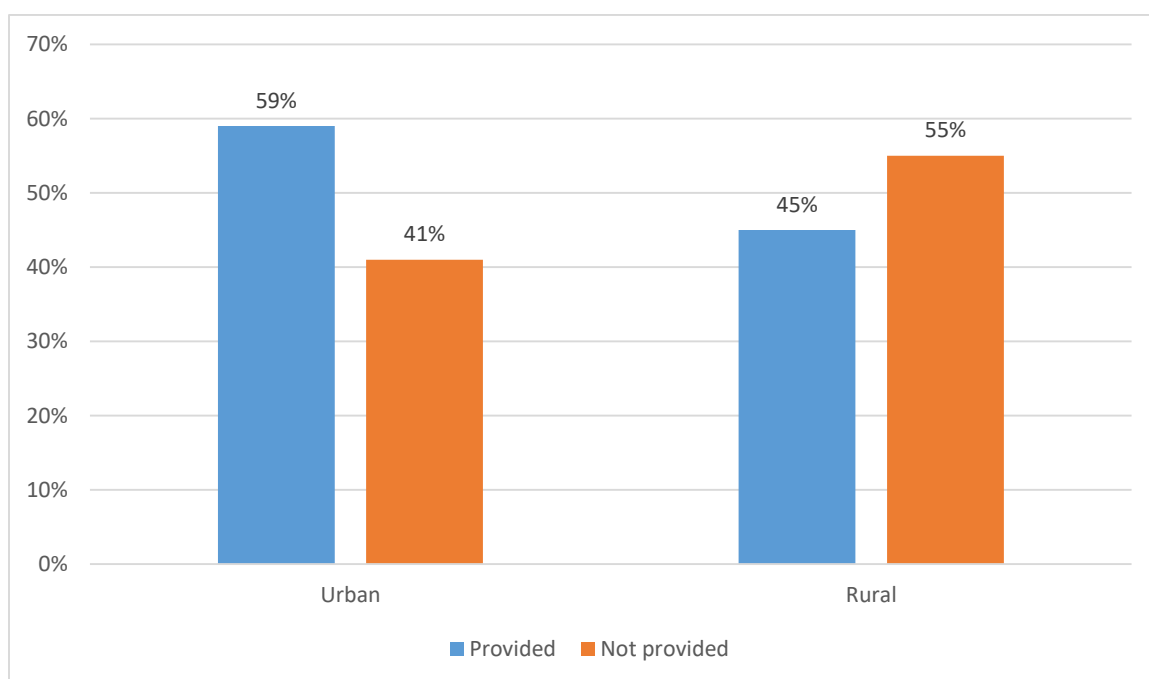
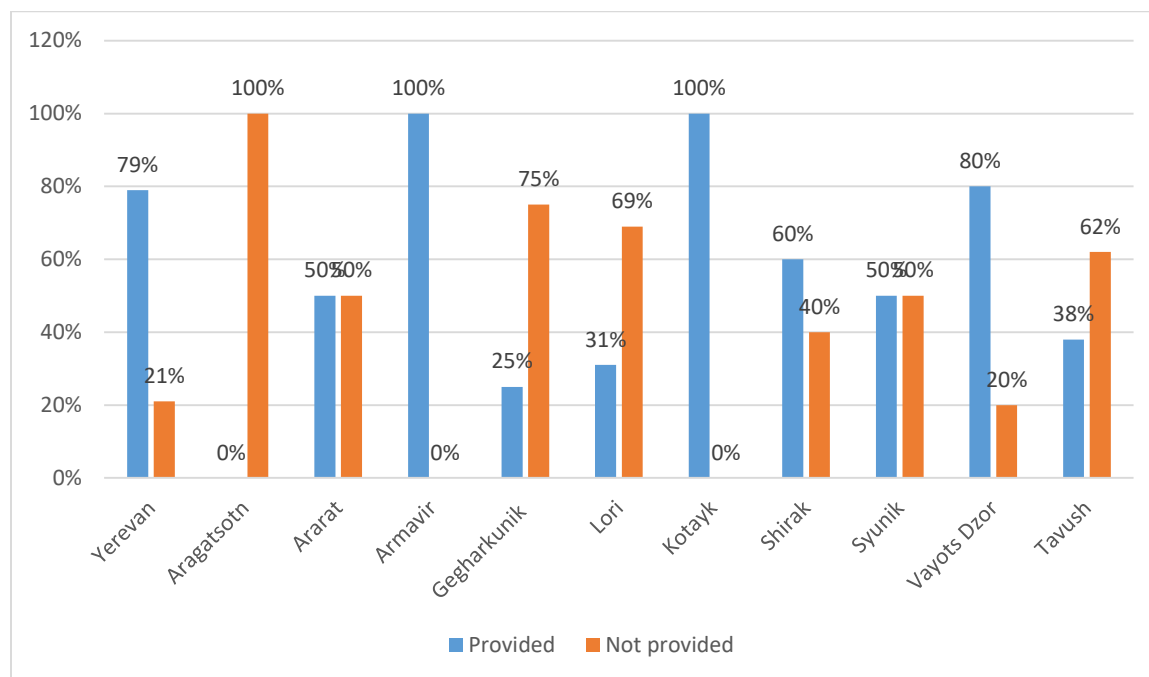


Table 94
Percentage Ratio of 75 Monitored

***Preschools by the Provision with Separate Toilets for
Girls and Boys in the Adult and Preparatory Groups by the Regions of RA and Yerevan***



The problem is most unfavorable in the rural settlements (55%), although the index is high in urban settlements (45%), as well. Aragatsotn (100%), Gegharkunik (75%), Lori (69%) and Tavush (62%) regions are in the worst condition.

According to Order No 857 of the Minister of Health, the floors of the toilets should be covered with ceramic mosaic tiles. Thus, the floors of the toilets of 71 (89%) out of the 80 monitored preschools were covered with ceramic mosaic tiles, which is significant for the proper arrangement of washing and disinfection processes.

Table 95
Percentage Ratio of 80 Monitored Urban and Rural
Preschools by the Covered with Ceramic Mosaic Tiles Toilet Floors

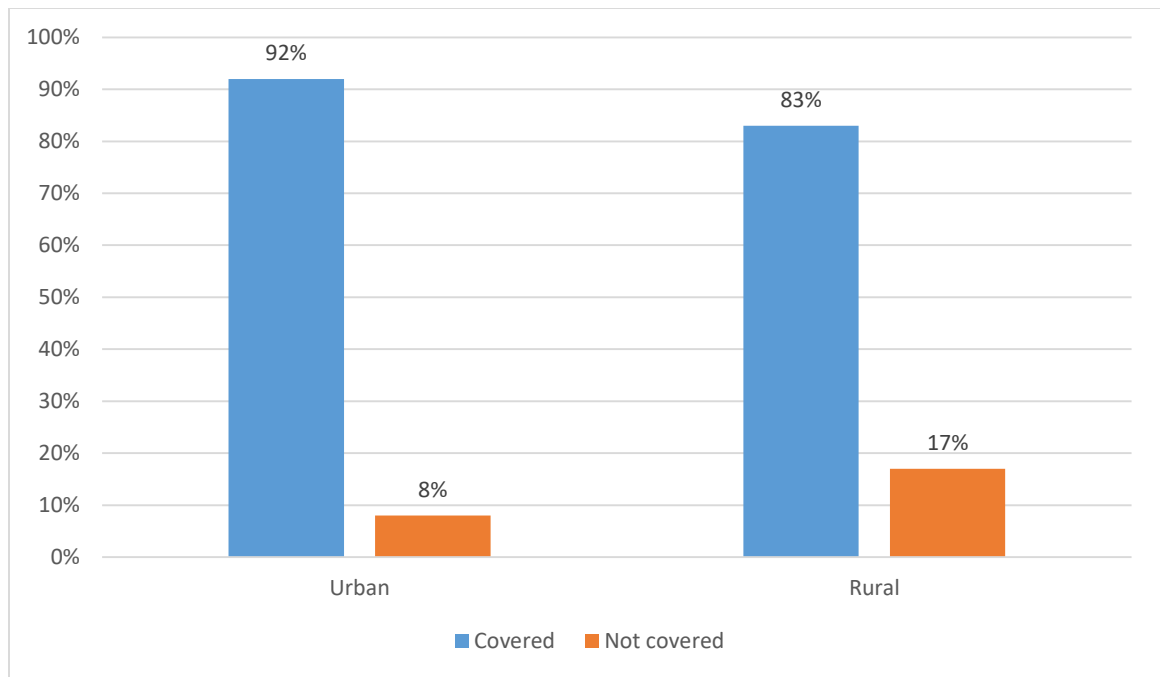
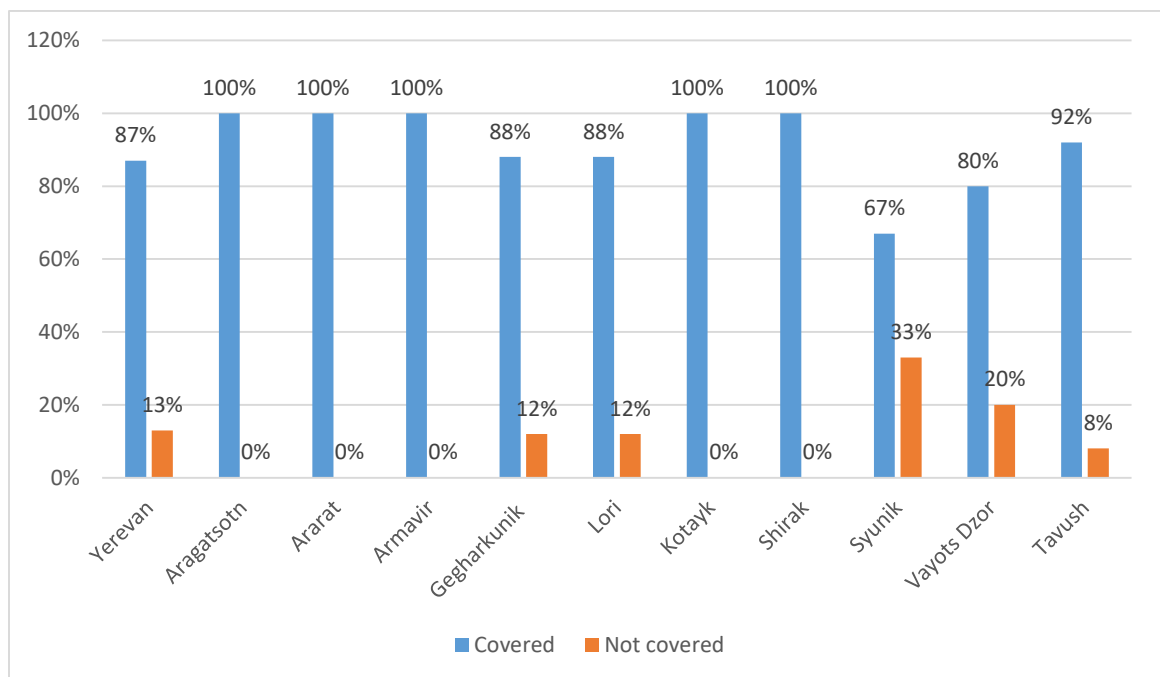


Table 96
Percentage Ratio of the 80 Monitored
Preschools by the Covered with Ceramic Mosaic
Tiles Toilet Floors by the Regions of RA and Yerevan



The rural settlements (17) are at the worst as compared with the urban settlements. The problem is widespread in Syunik (33%) and Vayots Dzor (20%) regions.

According to Order No 857 of the Minister of Health, 2 baby washbasins, 1 adult and 1 baby toilet bowl (with hygienic seat), a trap, a shower plate should be disposed in the toilet for the middle and adult nursery groups, and 1 towel in the toilet for the junior nursery group. A washbasin with an elbow-shaped mixer tap is disposed in the reception room and the play- room. There were medium and senior nursery groups in 76 (95%) out of the 80 monitored preschools. The toilets of 55 (72%) out of the 76 monitored preschools with medium and senior nursery groups are provided with baby washbasins. Meanwhile, in 38% of cases, the toilets of the rural preschools with middle and senior nursery groups are not provided with baby washbasins. The toilets of 36 (47%) out of the 76 monitored preschools with medium and senior nursery groups are provided with baby toilet bowls (with hygienic seat). The indicator is significant in terms of the accessibility of the preschool children sanitary-hygienic conditions.

Table 97

Percentage Ratio of 76 Monitored Urban and Rural Preschools by the Provision of Toilets for Middle and Senior Nursery Groups with Baby Washbasins

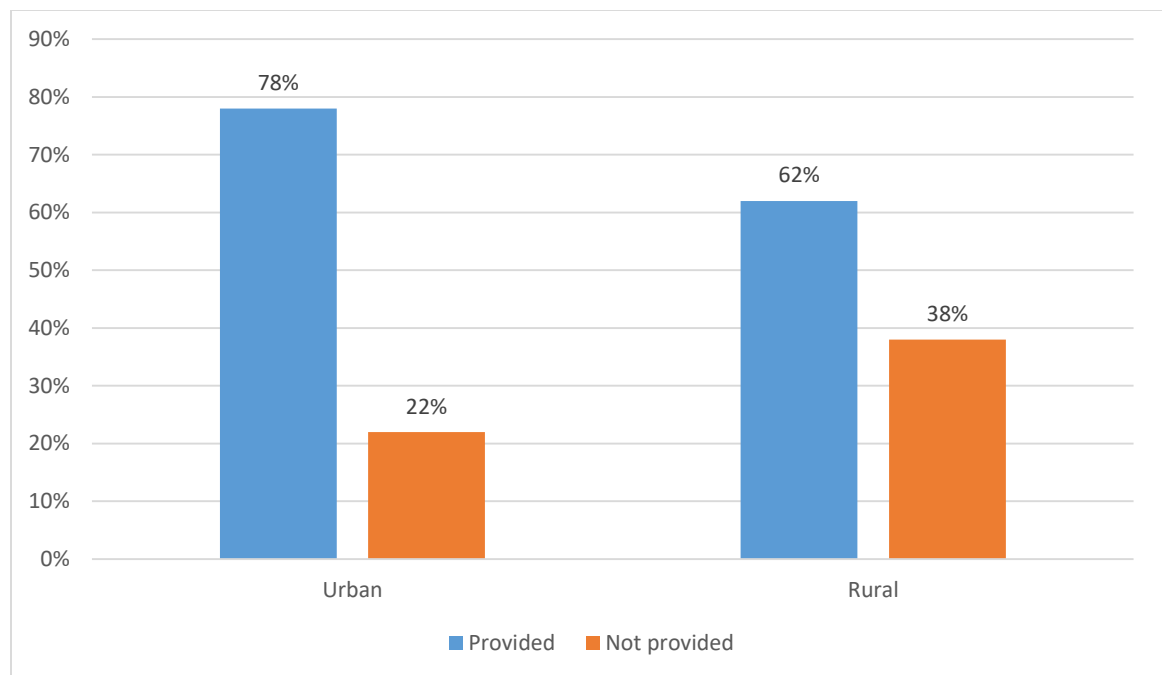
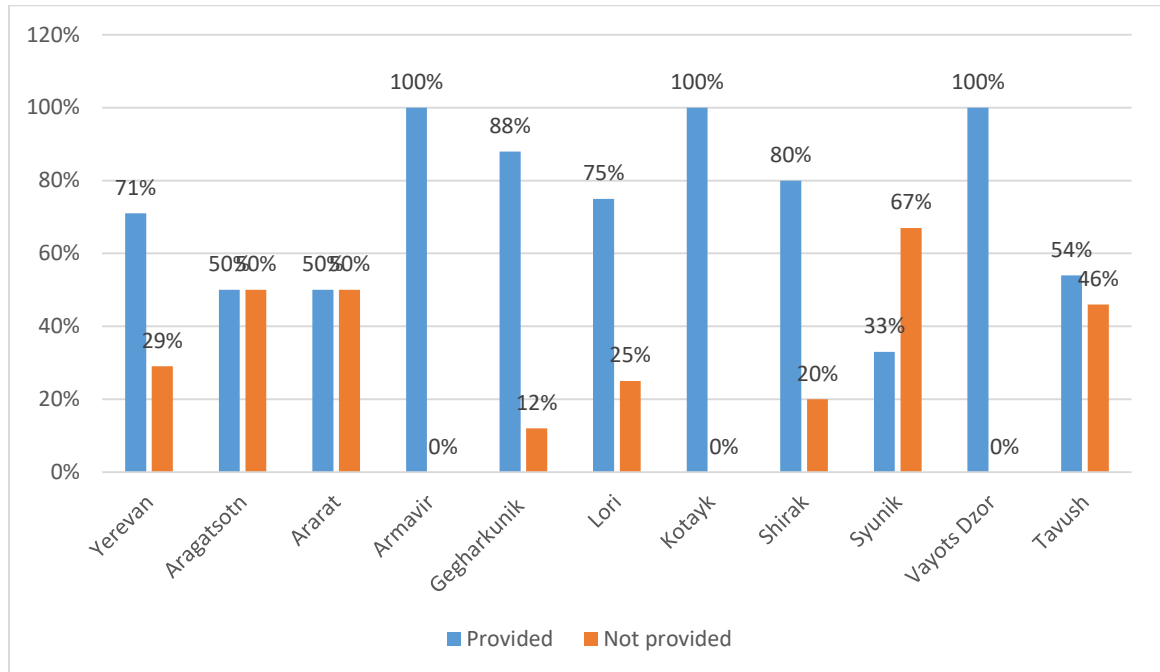


Table 98

Percentage Ratio of 76 Monitored Preschools by the Provision of Toilets for Middle and Senior Nursery Groups with Baby Washbasins by the Regions of RA and Yerevan



The indicator of insecurity is again higher in the rural settlements (38%), and the most widespread is in Syunik (67%), Tavush (46%), Aragatsotn (50%) and Ararat (50%) regions.

Table 99
Percentage Ratio of 76 Monitored Urban and Rural
Preschools by the Provision of Toilets for Middle and
Senior Nursery Groups with Baby Toilet Bowl (with hygienic seat)

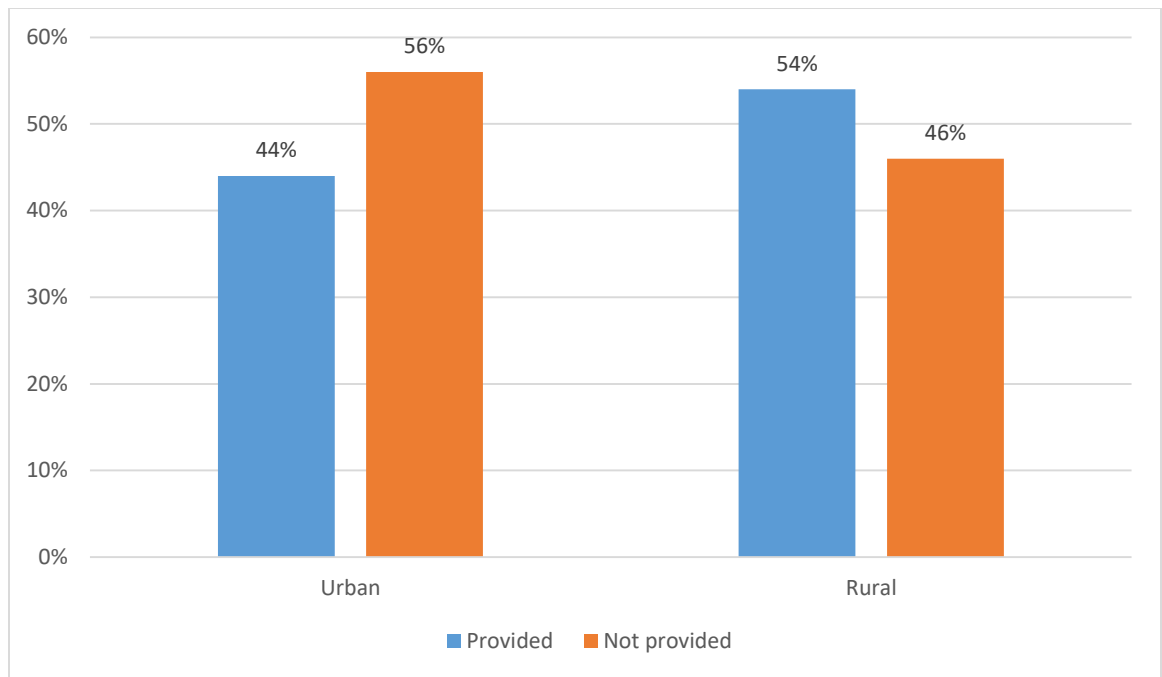
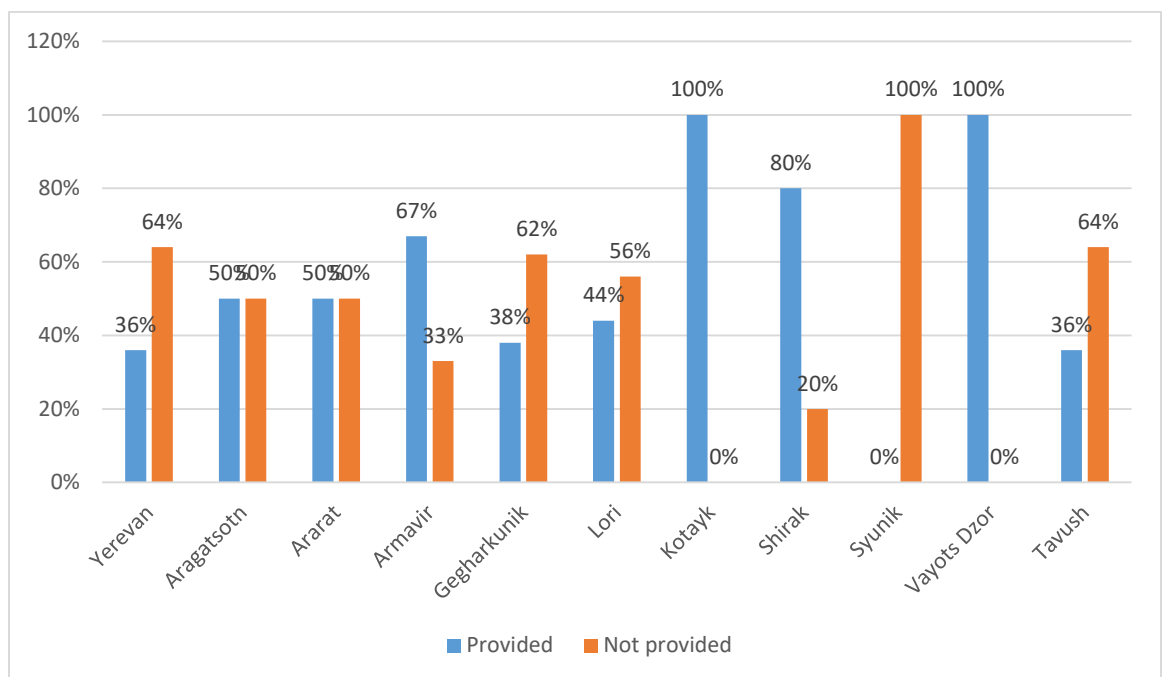


Table 100
Percentage Ratio of 76 Monitored Preschools by the Provision of
Toilets for Middle and Senior Nursery Groups with
Baby Toilet Bowl (with hygienic seat) by the Regions of RA and Yerevan



The lack of baby toilet bowls in the urban settlements (56%) is higher than in the rural settlements (44%), and is more widespread in Syunik (100%), Tavush (64%), Gegharkunik (62%) in Lori (56%) regions and in Yerevan (64%).

The toilets of 54 (29%) out of the 76 studied preschools with middle and senior nursery groups are provided with a trap, an individual towel. Meanwhile, a trap and a towel are lacking in the toilets of the rural preschools with middle and senior nursery groups in 42% of cases. The abovementioned indicator is significant in terms of washing and hygiene.

Table 101

Percentage Ratio of 76 Monitored Urban and Rural Preschools by the Provision of Toilets for Middle and Senior Nursery Groups with a Trap, Towel

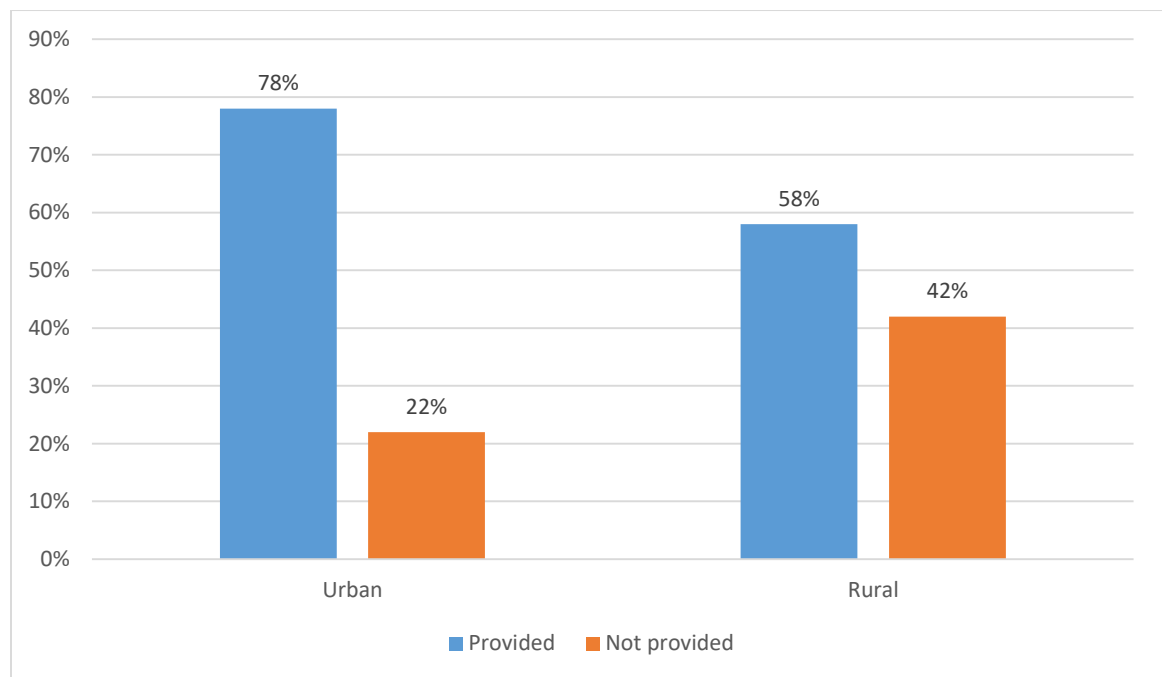
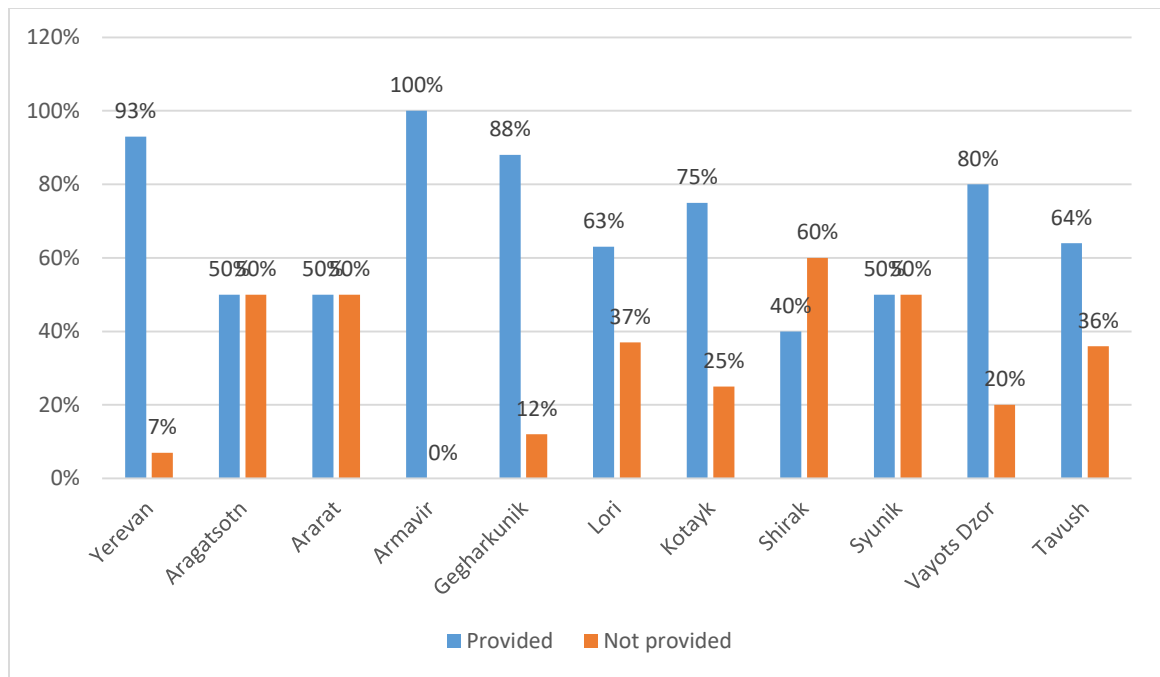


Table 102

Percentage Ratio of 76 Monitored Preschools by the Provision of Toilets for Middle and Senior Nursery Groups with a Trap, Towel by the Regions of RA and Yerevan



According to Order No 857 of the Minister of Health, 4 baby washbasins, 3 baby toilet bowls, a shower stand in the separated with partition compartment, a shower with a flexible hose and 1 towel are disposed in the junior 2nd and middle groups. There were junior 2nd and middle groups in 65 (85%) out of 80 monitored preschools. The toilets of the 62 (91%) out of the 68 monitored preschools with junior 2nd and middle groups are provided with a washbasin, and the toilets of the groups of 61 (90%) are provided with toilet bowls. The toilets of 16 (76%) out of the 68 monitored preschools with junior 2nd and middle groups are provided with a shower with a flexible hose and a towel. At that, the lack of a shower with a flexible hose and a towel is 81% in the urban preschools with junior 2nd and middle groups, and it is 65% in the rural preschools. This indicator is significant in the terms of the accessibility of sanitary conditions and hygiene.

Table 103

Percentage Ratio of 68 Monitored Urban and Rural Preschools by the Provision of the Toilets of the Junior 2nd and Middle Groups with Washbasins

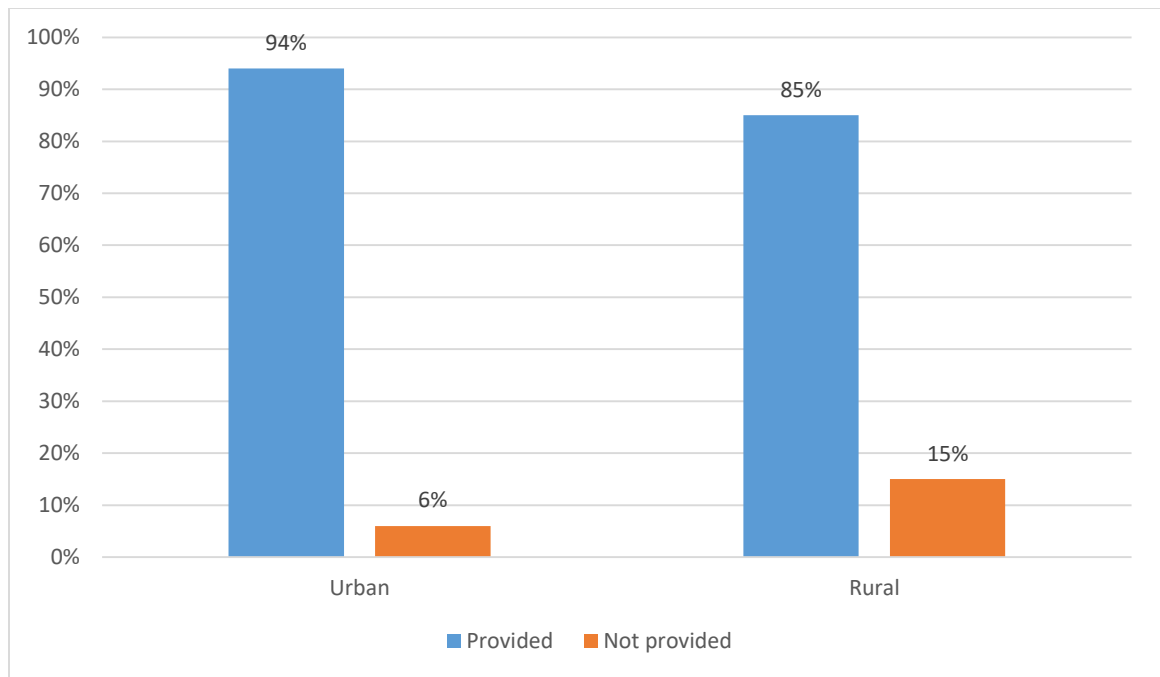


Table 104
Percentage Ratio of 68 Monitored Preschools by the Provision of the Toilets of the Junior 2nd and Middle Groups with Washbasins by the Regions of RA and Yerevan

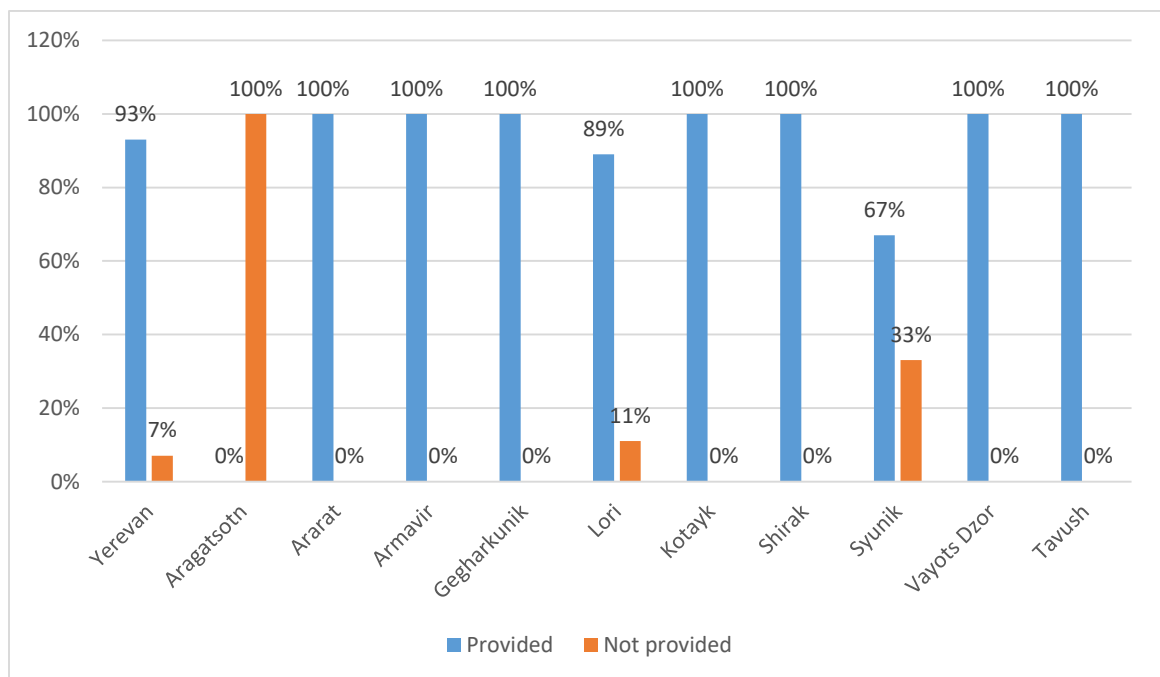


Table 105
Percentage Ratio of 68 Studied Urban and Rural Preschools by the

Provision of the Toilets of the Junior 2nd and Middle Groups with Toilet Bowls

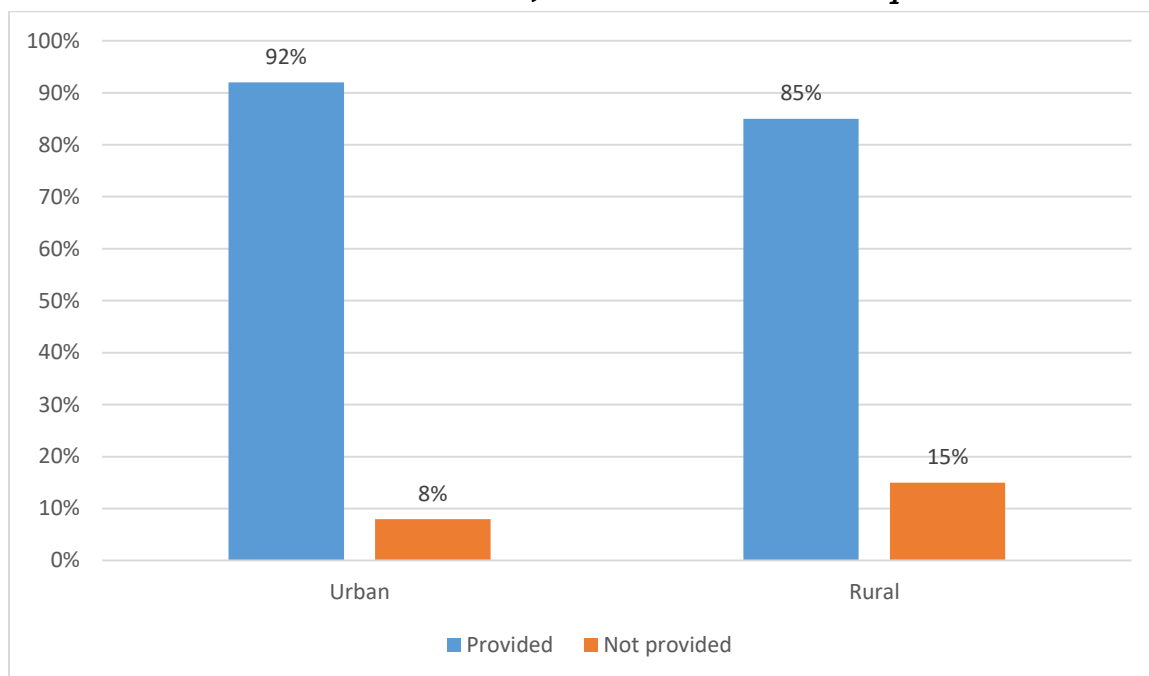


Table 106

Percentage Ratio of 68 Monitored Preschools by the Provision of the Toilets of the Junior 2nd and Middle Groups with Toilet Bowls by the Regions of RA and Yerevan

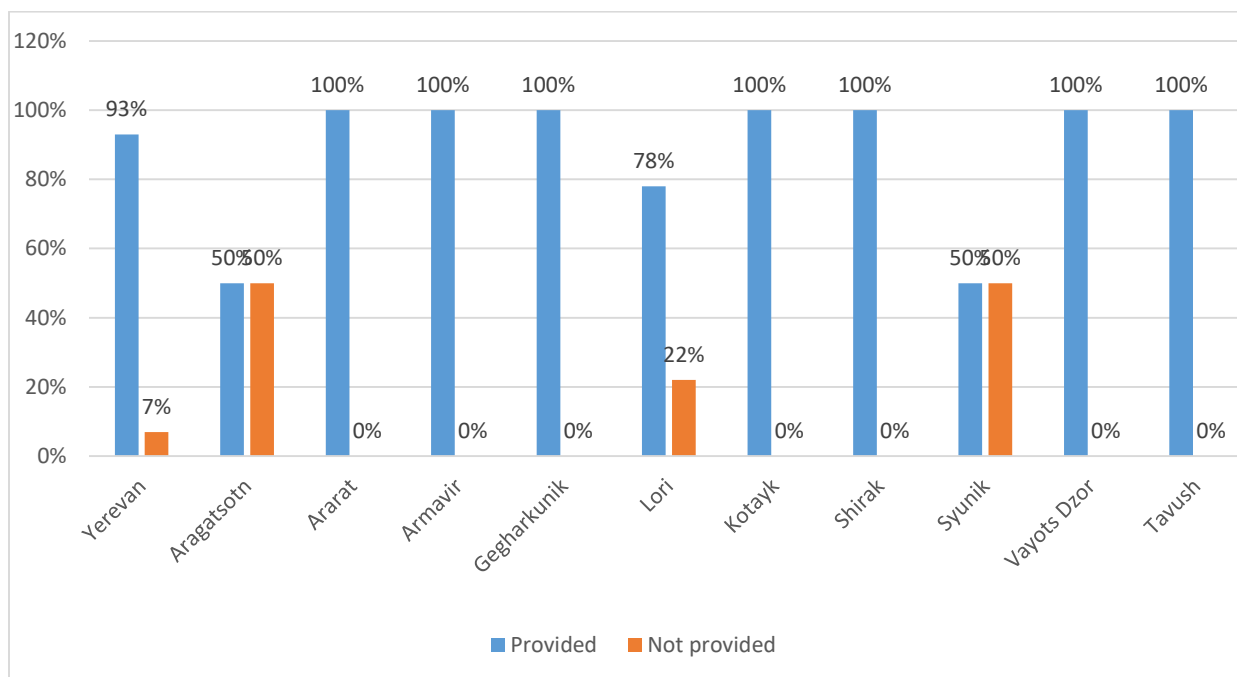


Table 107

Percentage Ratio of 68 Monitored Urban and Rural Preschools by the Provision of the Toilets of the Junior 2nd and Middle Groups with a Shower with a Flexible Hose and a Towel

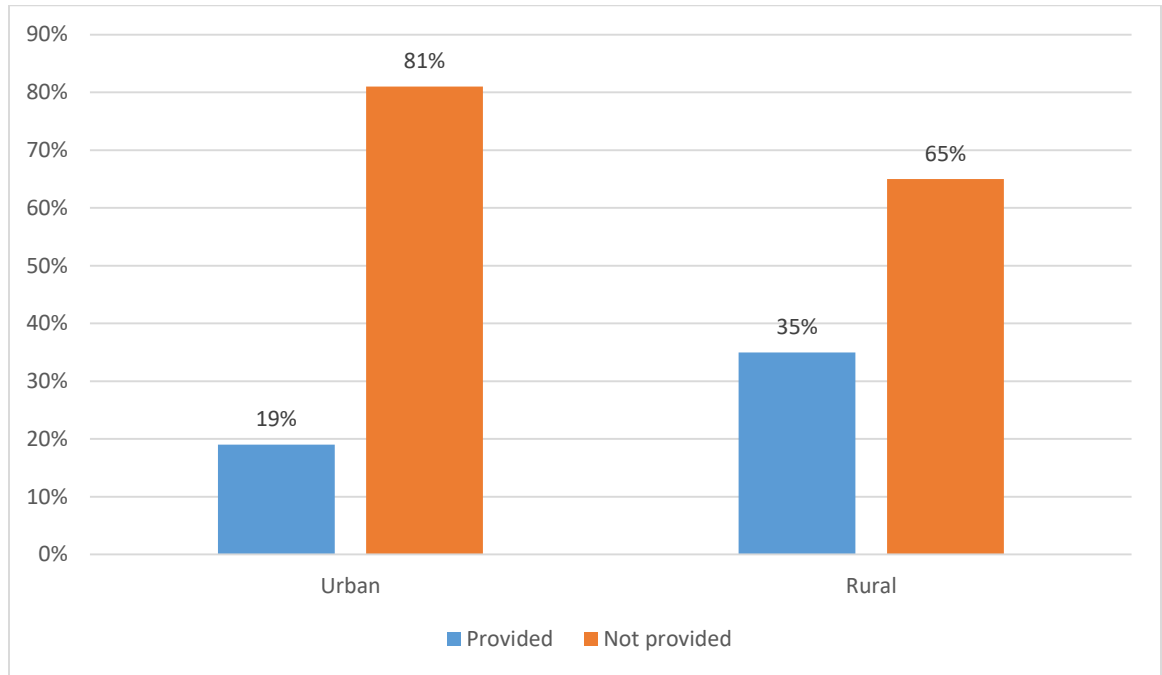
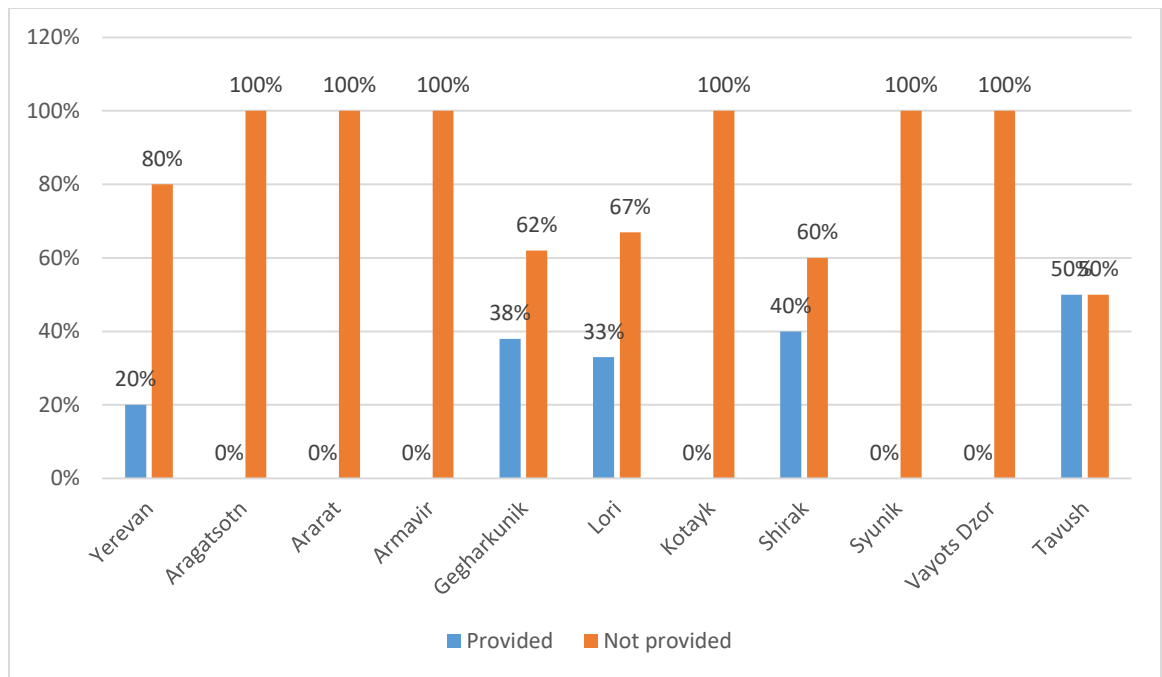


Table 108
Percentage Ratio of 68 Monitored Preschools by the Provision of the Toilets of the Junior 2nd and Middle Groups with a Shower with a Flexible Hose and a Towel by the Regions of RA and Yerevan



The problem of the lack of a shower with a flexible hose for the toilets of junior 2nd and middle groups exists on the whole territory of the Republic of Armenia: 50% and more.