

## Opinion of the Democracy Research Institute

### On the National Strategy for Human Rights Protection of Georgia for 2022-2030

On 5 September 2022, the Government of Georgia approved the National Strategy for Human Rights Protection in 2022-2023 and submitted it to the Parliament of Georgia.<sup>1</sup>

The first national human rights strategy that was approved by the Parliament of Georgia in 2014 was valid for 2014-2020 and expired at the end of 2020. The relevant government agencies worked on the new version of the strategy behind closed doors for more than two years. The document, however, was made public only on 23 August 2022. The government approved the strategy<sup>2</sup> on 5 September 2022, i.e., two weeks after the document became public, without allowing the stakeholders to familiarise themselves thoroughly with the strategy.

The Democracy Research Institute (hereinafter “DRI”) is disappointed by the non-inclusive decision-making approach in developing the human rights strategy. Contrary to the information included in the strategy,<sup>3</sup> civil society organisations have not been involved in the development of the document.

It is commendable that the strategy developed by the Government of Georgia covers the key challenges that prevail in terms of human rights protection in Georgia. However, the strategy has omitted the following central issues:

- *The need to reform the High Council of Justice in terms of developing the justice system;*
- *Problems related to the individual independence of judges;*
- *Effective investigation of alleged crimes committed by law-enforcement officers;*
- *Human rights protection in conducting covert investigative actions and carrying out the mandate by the State Security Service;*
- *Effective implementation of the reform of the preschool educational system;*
- *Prevention of early marriage;*
- *Continuation and improvement of the reform of labour legislation of Georgia;*
- *Eradication/prevention of continued occupation;*
- *Improving the protection of the rights of women, the LGBTI+ community, children and persons with disabilities living in the occupied territory; and*
- *Effective investigation of the incidents of alleged torture in the occupied territories and the implementation of preventive measures.*

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<sup>1</sup> Parliament.ge (webpage), based on the proposal of the Human Rights and Civil Integration Committee, the Bureau of the Parliament postponed the committee review of the strategy by 30 days from 11 October. See Decision no. 188/9 of the Bureau of the Parliament of 10 October 2022, available at: <https://info.parliament.ge/file/1/BillReviewContent/307879>.

<sup>2</sup> It should be noted that, on 14 February 2022, DRI addressed the Government of Georgia and expressed its readiness to be involved in the development of the strategy (Letter no. 20221402/303 of DRI).

<sup>3</sup> The National Strategy for Human Rights Protection in 2022-2030 discusses a wide involvement of CSOs in the development of the strategy, p. 2.

The adoption of the human rights strategy by the Parliament of Georgia is a good practice that was started in 2014. However, it is important that the adoption of the strategy by the Parliament acquired genuine meaning in addition to its symbolic implication. This would be unfeasible without allowing CSOs and interest groups to share their opinions in the process of discussing the document.

Therefore, DRI is submitting its opinions to the Parliament of Georgia, *inter alia*, about those issues that are not incorporated in the strategy. It is an opinion of the organisation that the implementation of the presented recommendations will have a positive impact on the quality of human rights protection in the country.

- **Human Rights Protection in the Administration of Justice**

The part of the strategy on the Human Rights Protection in the Administration of Justice emphasises the special role of the court in the administration of justice. However, the central problem of the judicial system, which is related to the concentration of power at the hands of the High Council of Justice (hereinafter the “HCoJ”), is omitted from the strategy. The fundamental reform of the High Council of Justice is one of the recommendations given to Georgia by the European Commission, which the European Commission considers a fundamental issue of the justice reform.<sup>4</sup>

DRI, therefore, believes that, for the protection of human rights in the administration of justice, it is important for the strategy to acknowledge the problem of concentration of power at the hands of the HCoJ and the document should include a specific objective for the solution of this issue. The ways in which this objective should be achieved would be determined in the action plan of the strategy.

It is, therefore, important for the **objective a)** of the abovementioned goal of the strategy to have the following wording:

*Promoting the independence, transparency, accountability and independence of the judiciary by, inter alia, reforming the High Council of Justice.*

Apart from the need to reform the HCoJ, the need to strengthen the independence of individual judges was voiced by almost all the speakers, invited by the Human Rights Secretariat, at the workshop held on 31 August 2022 to discuss the strategy. DRI shares this common concern. The amendments moved hastily into the Law of Georgia on Common Courts at the end of 2021 made it easier to bring disciplinary charges against judges and to order their secondment without their consent. The amendments allowed sanctioning judges through transferring to another court, demotion, etc. Judges publicly condemned this.<sup>5</sup>

It is, therefore, important to add the following objective to the respective goal of the strategy:

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<sup>4</sup> Communication from the Commission to the European Parliament, the European Council and the Council: Commission Opinion on Georgia's application for the membership of the European Union, Brussels, 17.6.2022, p. 17.

<sup>5</sup> Netgazeti.ge (webpage), *According to 14 Judges, It Becomes Permissible to Persecute Judges for Their Critical Opinions*, 28.12.2021, available at: <https://netgazeti.ge/law/584624/>.

*Enhancing individual independence of judges by harmonising the provisions governing disciplinary responsibility, promotion and secondment of judges with the best European standards.*

Corresponding changes will have to be made to the “key indicators” of the abovementioned objectives.<sup>6</sup>

- **Enhancing the crime prevention mechanism, improving the quality of investigation and increasing the effectiveness of the performance of law-enforcement agencies.**

According to the human rights strategy, increasing the accountability of law-enforcement agencies remains a priority since the quality of human rights protection significantly depends on the effective performance of the law-enforcement system.<sup>7</sup>

Fragile oversight of law-enforcement agencies gives rise to serious risks of human rights violations and has been repeatedly criticised by international organisations.<sup>8</sup> According to the assessment document of the European Commission on Georgia's EU membership application, respect for the privacy of communications has been put into question by eavesdropping and illicit surveillance of politicians, journalists, civil society activists and the diplomatic community; such surveillance includes tapes of private life and correspondence. The repeated calls to improve accountability and effective institutional oversight are yet to be addressed.<sup>9</sup> In this context, the hasty adoption of amendments to the Criminal Procedure Code by the Parliament of Georgia on 7 July 2022, which unjustifiably extended the maximum period for conducting covert investigative actions and the list of crimes to which this power applied,<sup>10</sup> drew strong criticism from the Venice Commission.

Since the human rights strategy does not acknowledge the abovementioned problem, in our opinion, the following objective should be added to the abovementioned goal of the strategy and have its implication specified in the respective action plan:

*Improving the mechanisms of democratic oversight of conducting covert investigative actions.*

In order to ensure the protection of human rights by law-enforcement agencies, it is also important to enhance the safeguards of independence of the agencies equipped with the relevant mandate. In 2016, the judgment of the Constitutional Court<sup>11</sup> was ignored and the Operational-Technical Agency remained under the State Security Service continuing to allow the State Security Service to have

<sup>6</sup> The National Strategy for Human Rights Protection in 2022-2030, p. 7.

<sup>7</sup> *Ibid.*, p. 8.

<sup>8</sup> Venice.coe.int (webpage) *Georgia – Urgent Opinion on the Draft Law on the Amendments to the Criminal Procedure Code, Adopted by the Parliament of Georgia on 7 June 2022*, issued on 26 August 2022, pursuant to Article 14a of the Venice Commission's Rules of Procedure, available at: [https://venice.coe.int/webforms/documents/?pdf=CDL-PI\(2022\)028-e](https://venice.coe.int/webforms/documents/?pdf=CDL-PI(2022)028-e).

<sup>9</sup> Communication from the Commission to the European Parliament, the European Council and the Council: Commission Opinion on Georgia's application for the membership of the European Union, Brussels, 17.6.2022, p. 11.

<sup>10</sup> Democracyresearch.org (webpage), *DRI Assesses the Legislative Initiative of the Parliamentary Majority as an Attempt to Legalise Total Control*, 21.04.2022, available at: <https://www.democracyresearch.org/geo/955/>.

<sup>11</sup> Matsne.gov.ge, Judgment no. 1/1/625,640 of the First Section of the Constitutional Court of Georgia adopted on 14 April 2016, available at: <https://matsne.gov.ge/ka/document/view/3263731?publication=0>.

unlimited access to the information obtained as a result of covert surveillance. It is, therefore, important to add the following objective under the goal of human rights protection by law-enforcement agencies:

*Ensuring the independence of the Operational-Technical Agency as an agency carrying out covert surveillance.*

Despite the broad mandate of the State Security Service and the high degree of secrecy of its activities, the service is not mentioned in the National Strategy for the Protection of Human Rights. In reality, due to the specific nature of the activities carried out by the State Security Service (broad investigative mandate including investigation of corruption crimes, carrying out covert surveillance measures, lack of democratic/parliamentary oversight, frequency of classifying information, etc.) there is the highest risk of human rights breaches on the part of the service. We, therefore, believe that there should be a new objective introduced in the strategy with the following wording:

*Revision of the mandate of the State Security Service, including in terms of investigating corruption crimes.*

Corresponding changes will have to be made to the “key indicators” of the abovementioned objective.<sup>12</sup>

- **Right to Respect for Private Life and Personal Data Protection**

The dissemination of secret recordings of personal life has become a tool of political attacks and smearing opponents in Georgia. Unfortunately, no investigation into dissemination of secret recordings have been successful. The effective version of the human rights strategy envisages the objective of increasing the effectiveness of investigations although there are no indicators developed in the strategy to assess the implementation of the aforementioned objective. In this regard, it is advisable to add to the “key indicators” of the achievement of the relevant goals and objectives, the indicator of the completed investigations into the incidents of breach of the right to respect for private life and adoption of final judgments with regard to those responsible.

Furthermore, we consider it important to introduce in the strategy a new objective dedicated to strengthening the mandate of the Personal Data Protection Service in the process of conducting covert investigative actions. Moreover, during the past years, incidents were revealed where, despite their duty, investigative bodies carried out covert investigative actions without submitting the relevant resolution to the Personal Data Protection Inspector. DRI recommends introducing the following *objectives* under the relevant goal of the strategy:

*Strengthening the mandate of the Personal Data Protection Service in terms of supervision/inspection of covert investigative activities.*

*Determining in accordance with international standards the scopes for processing personal data obtained during covert investigative actions.*

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<sup>12</sup> The National Strategy for Human Rights Protection in 2022-2030, p. 8.

- **Freedom of Speech, Media and Expression**

According to the assessment document of the European Commission on Georgia's EU membership application, despite the fact that the media environment is largely pluralistic, court proceedings and investigations against opposition media owners have become frequent. Intimidation and physical and verbal attacks on media professionals have increasingly taken place, whereas investigations are lacklustre. In this regard, to obtain the status of the EU applicant state, Georgia should “undertake stronger efforts to guarantee a free, professional, pluralistic and independent media environment, notably by ensuring that criminal procedures brought against media owners fulfil the highest legal standards, and by launching impartial, effective and timely investigations in cases of threats against the safety of journalists and other media professionals.”<sup>13</sup>

The goals and objectives determined by the strategy do not correspond to the severity of the problems that persist in terms of media freedom. The strategy does not acknowledge the significantly worsened media environment as a problem that in fact has served as the basis for the adoption of the abovementioned recommendation by the European Commission.

DRI, therefore, recommends that the goal of the respective sub-chapter should be formulated in such a way as to reflect the pursuit of establishing an environment free from violence where journalists could carry out their professional activities. Furthermore, we propose to add the following objectives to the objectives of the mentioned sub-chapter (accordingly, **objective b**) will be replaced):

*Ensuring media freedom and pluralism in accordance with international/European standards and best practices.*

*Ensuring a discrimination-free media environment.*

*Ensuring impartial, effective and timely investigation of interferences in the professional activities of journalists, threats against the safety of media professionals, and criminal cases against media owners.*

It is, therefore, advisable to add to the list of “key indicators” the number of cases instituted and investigated regarding interferences in the professional activities of journalists and threats against the safety of media professionals.

- **Freedom of Assembly and Association**

The respect for the right to freedom of peaceful assembly and freedom of association with others remains a significant challenge in Georgia mainly due to the alleged use of excessive force by police

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<sup>13</sup> COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL AND THE COUNCIL, Commission Opinion on Georgia's application for membership of the European Union, Brussels, 17.6.2022, p. 17.

officers and ineffective investigation of crimes allegedly committed by them.<sup>14</sup> We, therefore, believe that the following objective should be added to the document:

*Ensuring impartial, effective and timely investigation of criminal acts allegedly committed by law-enforcement officers during the dispersal of rallies and demonstrations.*

Corresponding changes will have to be made to the “key indicators”.

- **Accessibility of Education**

The problem of access to education was further worsened by the spread of the Coronavirus. The right to comprehensive education was restricted for minors and preschool children in penitentiary establishments along with the target groups listed in the strategy. Preschool education plays a central role in the development of a child. It is at this stage that the child socialises, develops skills, and prepares for school. Quality preschool education is the first level of general education and significantly determines a child's successful learning at school, laying the foundation for an educated society. The Covid-19 pandemic has damaged the preschool education system. In one year in Georgia, from March 2020 to March 2021, kindergartens worked for only 4-6 weeks while they did not work at all in Ajara.

DRI, therefore, recommends adding to the strategy in terms of preschool education new objectives with the following wording:

*Effective implementation of the reform of the preschool education system.*

*Increasing access to preschool education, especially bilingual preschool education, in regions populated by ethnic minorities.*

*Developing and implementing strategies for the continuous professional development of educators and pedagogues and ensuring the improvement of education infrastructure and resources.*

- **Labour Rights**

More than one progressive amendment has been made in terms of improving the labour legislation of Georgia. However, there are pressing issues remaining that need to be resolved through continuous reform of the labour legislation.

In terms of approximating the labour legislation with international standards, as well as improving the protection of the rights of employees in Georgia, it is necessary that the labour legislation of Georgia included the right to a solidarity strike, an adequate regulation for determining the minimum wage and

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<sup>14</sup> Democracyresearch.org (webpage), *Demonstrations under Observation*, available at: <https://www.democracyresearch.org/geo/527/>, 19.02.2021. See also netgazeti.ge (webpage), *Two Rallies will be Held Today to Protest Police Violence*, available at: <https://netgazeti.ge/news/588093/>, 25.01.2022.

maternity leave payment. The Labour Code allows employees to go on strike only in the event of a dispute with their employers, which excludes the possibility of exercising the right to a solidarity strike. According to the Government of Georgia,<sup>15</sup> the labour legislation of Georgia does not deny the right to a solidarity strike. However, the mere fact that the Labour Code does not recognise the right to a solidarity strike in express terms is an obstacle to exercising this right. Furthermore, it is within the discretion of the courts of Georgia to decide whether a solidarity strike is legal. The assessment of this issue by the court may differ from the opinion given by the Government of Georgia. That is why it is important that the labour legislation of Georgia granted employees the right to a solidarity strike in express and unambiguous terms. A solidarity strike is a recognised legal avenue in many countries, which is used by employees to raise wages, improve working conditions and solve a wide range of labour-related problems, including demanding legislative amendments, and not in a narrower sense, in cases of disputes with particular employers.

The only act determining the minimum wage in Georgia - the presidential decree - was adopted in 1999 setting the minimum wage at GEL 20.<sup>16</sup> The current situation requires a new solution to regulate the minimum wage. The issue of determining the minimum wage calculation method and providing for this issue in the labour legislation was discussed in the process of drafting the Labour Code of Georgia. Eventually, this idea did not materialise. A new regulation addressing the minimum wage issue would be an important step forward towards the improvement of the labour rights of employees in Georgia.

In addition, the regulation of the paid maternity leave for women employed in the private sector is appalling. Under the Labour Code of Georgia, leave due to pregnancy, childbirth, leave due to childcare and leave due to the adoption of a newborn is compensated in the amount of no more than GEL 1,000 from the state budget of Georgia. Considering the fact that there is a different regulation of the public sector, it is important that employees in the private sector had the opportunity to enjoy decent maternity leave. Therefore, it is important to include the following objective in the strategy within the scope of the abovementioned goal:

*Continuation of the reform of the labour legislation of Georgia to ensure approximation with international labour standards in terms of solidarity strikes, determination of the minimum wage and payment of leave due to pregnancy and childbirth, leave due to childcare and leave due to the adoption of a newborn.*

- **Rights of the Child**

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<sup>15</sup> www.ilo.org (webpage), Direct Request (CEACR) – adopted 2017, published at the 107th ILC session (2018) Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) – Georgia (Ratification: 1999), available at: [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100\\_COMMENT\\_ID,P11110\\_COUNTRY\\_ID,P11110\\_COUNTRY\\_NAME,P11110\\_COMMENT\\_YEAR:3344016,102639,Georgia,2017](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:13100:0::NO::P13100_COMMENT_ID,P11110_COUNTRY_ID,P11110_COUNTRY_NAME,P11110_COMMENT_YEAR:3344016,102639,Georgia,2017).

<sup>16</sup> Matsne.gov.ge, Ordinance no. 351 of the President of Georgia on the Amount of Minimum Wage, available at: <https://matsne.gov.ge/ka/document/view/112786?publication=0>.

The strength of the institution of a social worker is an important challenge in the field of child protection and welfare. The number of social workers is small and, despite this, their target groups and areas of work are diverse. The issue of their pay and working conditions, in general, are problematic, which ultimately affects their professionalism. The state policy in terms of strengthening the institution is unstable and often changes, which prevents effective results. Efforts made to raise the qualifications of social workers are also fragmented since they are not included in the continuous educational system. DRI, therefore, recommends adding an objective with the following wording to the section on children's rights:

*Strengthening social workers working in the field of child protection and welfare.*

Under Article 87.3 of the Code of Children's Rights, within the competence of the municipality, in order to manage the protection and support system of the basic rights and freedoms of the child, the municipality must determine the relevant responsible service (structural unit). This service/unit will be in charge of developing programmes for the protection and promotion of the rights of the child, ensuring their proper management and controlling their implementation within its own or delegated powers. The Code of the Rights of the Child came into force in 2019. However, little or no progress has been made in this regard to this day. Departments are generally set up and added to the system although the scope of assigned responsibilities is often unclear even for the employees of the department. Employees' qualifications are also extremely low.

Accordingly, in the objectives (despite the fact that the municipality is mentioned in **objective b**)), it is recommended by DRI that an objective with the following wording should be added:

*Strengthening of child protection departments in the municipality, raising the qualifications of employees and ensuring sustainable development of programmes tailored to the interests of children.*

A particular problem in the field of child protection remains the creation of a child-oriented environment in the process of questioning/interrogating a child in police stations, which increases the risk of secondary victimisation. Cases of sexual violence against girl victims are particularly dangerous due to the low gender sensitivity of police officers/investigators. It is important to note the lack of specialisation in police and investigative agencies regarding standards of conducting interviews and interrogations, which implies not only the ignorance of these standards but also ignorance of child interests, child needs and child-friendly approaches. There is also a low sensitivity to the needs themselves; the investigator/prosecutor cannot identify instances, where the involvement of a psychologist would be necessary. In addition, it is important to increase the compulsory knowledge and minimum competencies.

It is, therefore necessary to add an objective with the following wording to the part of the child's rights:

*Protecting the best interests of the child, creating a child-friendly environment during the interviews/interrogations of the child victim/witness.*

Despite the progress made in the reform of the juvenile justice system over the past decade, the prevention of juvenile delinquency remains a problematic issue. The commission of crimes by minors



who have not reached the age of criminal responsibility (up to 14 years) is particularly noteworthy. Statistics from the Ministry of Internal Affairs show an increase in the crime rate among children who have not reached the age of criminal responsibility. In this case, restorative approaches are neglected and the prosecutor makes a decision not to initiate criminal prosecution based on Article 105.2 of the Criminal Procedure Code of Georgia and terminates the investigation, while at this very moment there is a need to work with children, determine the circumstances causing criminal behaviour and take appropriate measures. The Juvenile Referral Centre was established at the beginning of 2020. However, the activities of the centre have not had a significant impact on minor children. Despite the fact that the reform has been underway for more than 10 years, the daily challenge is the scarcity of services for the beneficiaries of both the Referral Centre and the Juvenile Diversion and Mediation Programme. Against the background of the scarcity of services, it becomes impossible to achieve the goals of reform and provide real support and protection for children who have committed a crime.

Accordingly, to the mentioned **objective c) *improvement in accordance with international standards of justice, accommodated to crime prevention and resocialisation/rehabilitation mechanisms for children, including minors in conflict with the law and with difficult behaviour*** – the following should be added: **Crime prevention and socialisation of children who have not reached the age of criminal responsibility.**

Prevention and response mechanisms to protect children living and working on the street are still riddled with major challenges. According to the 2018 [report](#) by the United Nations Children's Fund, children living and working on the streets are at high risk of violence, including sexual violence. Primary health care services and education are not available to them. They are deprived of a family environment.

To the mentioned **objective d) *further strengthening of protection mechanisms for children living and working on the street, including minors with difficult behaviour*** – the following should be added: **Establishment of preventive and response mechanisms for children living and working on the street.** It should also highlight the vulnerability of girls.

The use of drugs and psychoactive substances is a problematic issue. Accordingly, it is recommended to add to **objective k) *promotion of a healthy way of life*** the following: **prevention of abuse of drugs and psychoactive substances among children, adolescents and young people.**

Child marriage remains a major threat, especially when it comes to women. Statistics also confirm the huge gender gap - 14% of women aged 20-24 were married before the age of 18, whereas this number is 0.5% for men. The situation is also radically different depending on the type of settlement – the percentage of early marriage in rural areas is 25%, and in urban areas - 8%.

Accordingly, the objective with the following wording should be added to the rights of the child: ***Developing a state policy for the prevention of early marriage and improving response mechanisms.***

- **Protection of the Rights and Freedoms of the Population Affected by the Illegal Occupation of the Territories of Georgia by the Russian Federation, Including IDPs and Refugees from the Occupied territories of Georgia, the Population of Villages Adjacent to the Occupation Line, and People Living in the Occupied Territories.**

In the human rights strategy, the problems and challenges in the occupied territories and the occupation line are referred to separately. It is the opinion of DRI that the implementation of the proposed recommendations will contribute to restoring the violated rights of people living in the occupied territories and adjacent to occupation line and preventing future violations.

Basic human rights are neglected in the occupied territories of Georgia. This also has a chilling effect on the rights of people living near the occupation line. Investigating the incidents of illegal arrests in the occupied territories/along the occupation line and taking appropriate preventive measures is a significant challenge due to the lack of willingness on the part of the occupation regime. It is, therefore, necessary to have specific preventive measures in place by the Georgian authorities so that incidents of rights violations can be reduced, both in the territory controlled by the Government of Georgia and on the occupied side.

- **Rights of People Living in Villages Adjacent to the Occupation Line**

The goal determined by the strategy – *promotion of security, protection of human rights and improvement of the socio-economic situation of the population living in the villages adjacent to the occupation line* – is a repetition of the goal included in the human rights strategy for 2014-2020. This confirms once again the need for the development of an effective action plan for the human rights strategy and control over its implementation.

The fieldwork revealed that the challenge in the villages located near the occupation line is continuous occupation, which is directly affecting the continuous protection of the security of the people living in the villages adjacent to the occupation line. Law-enforcement officers conduct preventive measures a few kilometres away from the occupation line. Due to the lack of security and mutual restriction of free movement, the villages controlled by the Government of Georgia are being vacated. Therefore, it is the opinion of the organisation that the following objective should be added to the strategy:

*Eradication/prevention of continued occupation through the support of international partners, effective use of bilateral and multilateral international instruments, negotiation formats and available legal mechanisms.*

Dissemination of information about the legal status of people living in the villages adjacent to the occupation line is a significant challenge. Unjustified classification of information usually leads to the deterioration of an individual's legal status. It is therefore advisable to add the following objective to the strategy:

*Ensuring openness of information about the legal status of people living in the villages adjacent to the occupation line.*

It is commendable that one of the objectives of the strategy is to improve the right to education of the persons living in the territory adjacent to the occupied territory. However, due to the relevance and significance of the issue, DRI considers it necessary that informal education is referred to in express terms in the abovementioned objective:

*Improving the socio-economic situation, including health, education, including informal education, and infrastructural situation of the population affected by the occupation of territories of Georgia by Russia in the villages adjacent to the occupation line, taking into account their needs and implementing effective measures.*

- **Protection of the rights of people living in the occupied territories of Georgia**

In the occupied territories, the protection of human rights, especially the rights of minorities, is virtually neglected. According to the organisation, for example, specialised services are not accessible for persons with disabilities, there are no orphanages \ and women's rights are violated (for example, abortion is not allowed in Abkhazia). It is, therefore, advisable to share with stakeholders living in the occupied territories the experience gained from projects and activities implemented in Georgia after the ratification of the Istanbul Convention. Thus, it is the opinion of the organisation that it is important to add a new objective to the strategy or to rephrase **objective a)** in a way that highlights the need for supporting the protection and improvement of the legal status of vulnerable persons, namely, **women, LGBTI+ community, children and persons with disabilities living in the occupied territory.**

Unfortunately, in recent years, there have been incidents of deprivation of life based on discriminatory motives and as a result of torture committed in the occupied territories. Accordingly, in order to secure the right to life and the prohibition of torture, it is appropriate to include the following objective in the strategy:

*Effective follow up on the incidents of torture and deprivation of life based on discriminatory motives in the occupied territories using international mechanisms.*

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In addition to the opinions presented above about the concrete priorities and goals of the strategy, DRI's general recommendation is to consider the reports of the Public Defender of Georgia among the main indicators of the fulfilment of the relevant human rights goals in the strategy. The same is recommended with regard to the assessments of authoritative organisations such as Freedom House, Amnesty International and Human Rights Watch.

Furthermore, the Democracy Research Institute expresses its readiness to discuss the changes proposed to be moved into the human rights strategy in the format of workshops to be held jointly with relevant

agencies. Moreover, the organisation hopes that, unlike the process within which the strategy has been developed, action plans will be developed in an environment that will be inclusive and accessible for all stakeholders. In conclusion, for the effectiveness of the strategy, it is essential to start immediately the process of developing detailed action plans on the basis of the document.