

Human Rights Watch Submission General Recommendation on Girls'/Women's Right to Education June 23, 2014

Human Rights Watch welcomes the opportunity to provide input to the Committee on the Elimination of Discrimination against Women (CEDAW Committee) for its General Recommendation on girls'/women's right to education. Human Rights Watch has examined this issue in our human rights reporting around the world, on which the following information and recommendations are based.

This submission is structured around the five main principles on the right to education as listed in the concept note for the General Recommendation, with an added focus on the right to education for women and girls in conflict. This is not an exhaustive set of issues drawn from the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), but rather topics that we believe require particular attention in the General Recommendation.

A) Elimination of all forms of discrimination in access to and quality of education

Child, early, and forced marriage

The discriminatory and harmful practice of child marriage is intrinsically linked to the right to education. When girls are not in school, they are more likely to get married. Conversely, when girls marry young, they are often unable to finish their education, because of practical barriers, force, or discrimination. By failing to curb child marriages, governments are failing in their obligation to ensure access to education for boys and girls on an equal basis.

Human Rights Watch has documented the consequences of child marriage, including on the right to education, in a number of countries, including Malawi, South Sudan, Afghanistan, and Yemen.² Girls told Human Rights Watch that marriage interrupted or ended their

¹ Convention on the Elimination of All Forms of Discrimination against Women,

G.A. res. 34/180, 34 U.N. GAOR Supp. (No. 46) at 193, U.N. Doc. A/34/46, entered into force Sept. 3, 1981.

² Human Rights Watch, *Malawi-"I've Never Experienced Happiness": Child Marriage in Malawi*, March 2014, http://www.hrw.org/node/123427. Human Rights Watch, *South Sudan-"This Old Man Can Feed Us, You Will Marry Him": Child and Forced Marriage in South Sudan*, March 2013, http://www.hrw.org/reports/2013/03/07/old-man-can-feed-us-you-will-marry-him. "Afghanistan: Ending Child Marriage and Domestic Violence," Human Rights Watch news release, September 4, 2013, http://www.hrw.org/news/2013/09/04/afghanistan-child-marriage-domestic-violence-harm-progress. Human Rights Watch, *Yemen-"How Come You Allow Little Girls to Get Marriage": Child Marriage in Yemen*, December 2011, http://www.hrw.org/reports/2011/12/07/how-come-you-allow-little-girls-get-married.

education. Many said that they found it difficult to return to school after marriage because of discriminatory school policies, lack of money for school fees, lack of child care, unavailability of flexible school programs or adult classes, and the need to do household chores. Others said that their husbands, own family members, or in-laws would not allow them to continue school after marriage. In adulthood, many child brides remained financially dependent on spouses in part because they lacked the education and skills needed to provide for themselves and their families.

Recommendations:

- Explicitly highlight the link between child marriage and the right to education for girls;
- Call on states to set the minimum age of marriage at 18;
- Urge states to ban discrimination in schools against girls based on their marital status, pregnancy, or motherhood;
- Urge states to adopt policies and programs that will remove barriers to primary and secondary education for married women and girls.

Sexual violence and harassment in school

Legislation related to sexual harassment and violence in education is critical to ensuring women's and girls' right to education. Many girls around the world experience school-related violence that puts their physical and psychological well-being at risk, undermines their opportunities to learn, and often causes them to drop out of school entirely. Schoolgirls may be raped, sexually assaulted, and sexually harassed by their classmates and even by their teachers or other school officials.

In recent years, Human Rights Watch research has focused on how certain vulnerable groups experienced violence and harassment in and outside the classroom (see section C). However, in a 2000 investigation in South Africa, Human Rights Watch documented how schoolgirls of every race and economic group encountered sexual violence and harassment on a daily basis.³ Human Rights Watch documented cases of rape, assault, and sexual harassment of girls committed by both teachers and male students. Girls were raped in school toilets, in empty classrooms and hallways, and in hostels and dormitories. Girls were also fondled, subjected to aggressive sexual advances, and verbally degraded at school. A 2002 Human Rights Watch investigation in Zambia found similar problems.⁴ Sexual abuse and exploitation in school environments was frequent. Some of the perpetrators were teachers who prey on vulnerable girls, exchanging answers to tests or higher grades for sex. Most abuses by teachers were not reported, and few teachers were penalized or disciplined. In some cases, parents negotiated for the teacher to marry the girl.

Recommendations:

- Ensure and enforce prohibitions on sexual violence and harassment by teachers, staff, and students as necessary for the fulfillment of a girl's right to education;

³ "Scared at School: Sexual Violence Against Girls in South African Schools," Human Rights Watch news release, March 27, 2001, http://www.hrw.org/news/2001/03/26/south-africa-sexual-violence-rampant-schools.

⁴ Human Rights Watch, *Zambia-Suffering in Silence: The Links between Human Rights Abuses and HIV Transmission to Girls in Zambia*, January 2003, http://www.hrw.org/reports/2003/01/27/suffering-silence-o.

- Urge states to develop and implement programs that would afford girls basic protections from sexual violence and exploitation;
- Urge states to adopt and disseminate a set of standard procedural guidelines governing how schools are to address allegations of sexual violence and harassment, and explaining how schools should treat victims and perpetrators;
- Urge states to provide training to develop the capacity of medical, judicial, and law enforcement personnel to assist adult and child victims of sexual harassment and assault.

B) Expansive education framework to include all levels and types of education

Sexuality education

Human Rights Watch appreciates that the CEDAW Committee has made sexual and reproductive health education a priority in its concluding observations and has asked state parties to develop and implement sexuality education programs. In General Recommendation No. 24, the CEDAW Committee reaffirms that Article 12 of CEDAW ensures women's right to have access to healthcare information, including information on family planning methods. In February 2014 the committee said that adolescents should have access to accurate information about their sexual and reproductive health and rights, including responsible sexual behavior, prevention of early pregnancies, and sexually transmitted diseases. The committee has also recommended expansion of sexual and reproductive health programs as a means to address high rates of abortion and maternal mortality, which in turn impact access to education for women and girls.

Human Rights Watch has similarly found, for example in Malawi, South Sudan, and Kenya, that one issue contributing to teenage pregnancy, maternal mortality, and morbidity is girls' poor knowledge of reproductive health. Many of the girls we interviewed lacked accurate reproductive health information. Some displayed a lack of basic knowledge about sexuality and contraception, while others said they did not have this knowledge before getting married. Girls frequently told us they did not discuss sex with their parents. In Malawi, Patricia K. said she started having sex before she reached puberty, and became pregnant when she was about fourteen and in standard five (fifth grade). She said, "I was thinking of it more like playing. I didn't think I would get pregnant."

⁵ CEDAW Committee, General Recommendation 24, Women and Health (Article 12), U.N. Doc. No. A/54/38/Rev.1 (1999), para. 23.

⁶ CEDAW Committee, "Statement of the Committee on the Elimination of Discrimination against Women on sexual and reproductive health and rights: Beyond 2014 ICPD review," Fifty-seventh session, February 10-28, 2014, http://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1_Global/INT_CEDAW_SED_57_21765_E.pdf, annex 2.

⁷ Human Rights Watch, "I've Never Experienced Happiness," "This Old Man Can Feed Us, You Will Marry Him." Human Rights Watch, Kenya-"I Am Not Dead, But I Am Not Living": Barriers to Fistula Prevention and Treatment in Kenya, July 2010, http://www.hrw.org/reports/2010/07/15/i-am-not-dead-i-am-not-living.

⁸ Human Rights Watch, "I've Never Experienced Happiness," p. 17.

Recommendations:

- Urge states to make comprehensive sexuality education part of the school curriculum, and ensure that teachers are trained in its contents and allocate time to teach it:
- Urge states to develop a strategy for compulsory, age-appropriate, systematic, comprehensive, and inclusive sexuality education for in- and out-of-school adolescents.

Physical education

Physical education is an integral part of education, and girls and boys should enjoy equal access to it. Four main tenets underpin this right: the right to participate in cultural life (which includes the right to participate in sport); the right to an education aimed at the fullest development of a child's personality and his or her physical and mental abilities (physical education is integral to this); the right to the highest attainable standard of health; and, the right to be free from discrimination (which demands that women and men, girls and boys, enjoy equal rights to physical education and sports).

Girls are in some cases excluded from physical education because of practical barriers and de facto discrimination, but some women and girls are prevented from participating in sports due to discriminatory policies. As Human Rights Watch documented in 2012, Saudi Arabia is the only country in the world that still effectively bars girls from taking part in physical education in government schools,9 though the Shura Council directed the Education Ministry to study the possibility of introducing physical education for girls in the future.¹º There is no state sports infrastructure for women, with all designated buildings, sports clubs, courses, expert trainers, and referees restricted to men.

Recommendations:

- Address sports for women and girls specifically in the general recommendation;
- Urge states to lift any discriminatory barriers to girls participating in sports or physical education in school;
- Urge governments to make physical education a mandatory subject for girls in schools throughout the years of compulsory education on an equal basis with physical education for boys and establish programs to train teachers of physical education for girls.

⁹ Human Rights Watch, *Saudi Arabia- "Steps of the Devil": Denial of Women's and Girls' Rights to Sport in Saudi Arabia,* February 2012, http://www.hrw.org/reports/2012/02/15/steps-devil-o.

¹⁰ "Saudi Arabia: Accelerate Reforms for Girls' Sport in State Schools Vote to Consider Physical Education a Good First Step," Human Rights Watch news release, April 12, 2014, http://www.hrw.org/news/2014/04/11/saudi-arabia-accelerate-reforms-girls-sport-state-schools.

C) Education must be available, accessible, acceptable, and adaptable to women and girls in urban as well as in rural areas and to all disadvantaged groups

Women and girls with disabilities

Millions of women and girls with disabilities worldwide are deprived of the right to education, as a result of multiple discrimination based on both gender and disability. According to the United Nations Educational, Scientific and Cultural Organization (UNESCO), a third of out-of-school children worldwide are children with disabilities. Human Rights Watch's investigation in Nepal, and upcoming research in Russia, Zambia, and India, found that women and girls with disabilities are largely excluded from education and skills training.

Although many governments officially promote inclusive education, in practice, children with disabilities, especially girls, are either excluded or segregated in special schools. Low attendance rates of children with disabilities, particularly girls, have similar causes globally: lack of physical accessibility, refusal of teachers or school principals to enroll the children, lack of accommodation in school curricula and teaching materials, and more generally, stigma and lack of awareness among parents and communities that yield negative attitudes about the learning capacities of women and girls with disabilities. Furthermore, upcoming Human Rights Watch research in India shows that these barriers to education are even higher for women and girls with intellectual or psychosocial disabilities residing in institutions.

Low attendance rate is not the sole issue. According to a World Health Organization survey in 51 countries, the estimated rate of primary school completion is 42 percent for girls with disabilities, whereas it is 53 percent for girls without disabilities. In Nepal, Human Rights Watch found that girls with disabilities are also disproportionally affected by school drop-out, particularly once they reach puberty because there are no support services in school. The toilets are often not accessible or safe. While this issue impacts all girls, the difficulty that girls with disabilities have in moving, dressing, and using the bathroom independently increases their vulnerability to intrusive personal care or abuse. In India, Human Rights Watch found cases of girls with intellectual disabilities who were unable to attend school due to the lack of support in managing menstruation.

Recommendations:

- Urge governments to ensure that women and girls with disabilities have access to inclusive, free primary education and secondary education on an equal basis with all

¹¹ UNESCO, "Equal Right, Equal Opportunity – Inclusive Education for All," accessed June 23, 2014, http://www.unesco.org/new/en/education/themes/leading-the-international-agenda/education-for-all/single-view/news/equal_right_equal_opportunity_inclusive_education_for_all/.

¹² Human Rights Watch, *Nepal- Futures Stolen: Barriers to Education for Children with Disabilities in Nepal*, August 2011, http://www.hrw.org/reports/2011/08/24/futures-stolen.

¹³ UNICEF, "The State of the World's Children 2013: Children with Disabilities," May 2013, http://www.unicef.org/sowc2013/files/SWCR2013_ENG_Lo_res_24_Apr_2013.pdf (accessed June 23, 2014), p. 12.

- women and girls, including by raising awareness of parents of women and girls with disabilities and providing support services, especially once they reach puberty;
- Urge states to involve women and girls with disabilities and their parents or family members in decision-making and monitoring processes.

Women and girls from certain castes, ethnicities, religions

While enrollment rates might be increasing, including for girls, millions of children from disadvantaged communities do not actually attend classes, often because their caste, ethnicity, economic condition, religion, as well as gender, acts as a barrier to education. Discrimination by teachers and other school staff may lead to increased truancy among these children, and eventually they stop going to school. Human Rights Watch documented in 2014 in India how children from poor and marginalized communities—Scheduled Castes, Scheduled Tribes, and Muslims—face discrimination in government schools and how they form the majority of the children who drop out.¹⁴ Once these children drop out, they are often pushed into child labor or marriage.

The school dropout rates among girls are far higher than for boys. In India, according to government statistics from 2012, the dropout rate among adolescent girls is as high as 64 percent.¹⁵ They are particularly vulnerable to child marriage.

Recommendations:

- Urge states to develop clear guidelines to address discrimination and other abuses of girls from disadvantaged backgrounds, and set out appropriate disciplinary measures;
- Urge states to develop guidelines and manuals for teachers that set forth good practices for social inclusion and equity, such as encouraging children from marginalized communities to participate in school activities, ensuring more frequent collaboration between children of different castes, and promoting innovative activities aimed at inclusion.

Lesbian, Bisexual, and Transgender People

Bullying, harassment, and threats by fellow pupils and teachers against lesbian, bisexual, and transgender students form another barrier to the right to education for girls. In South Africa for example, Human Rights Watch found that despite an inclusive legal framework that seeks to outlaw all forms of improper discrimination and intolerance in schools, lesbians experienced ridicule and abuse from teachers as well as fellow students. We found that schools can perpetuate and reinforce social prejudices due to poor implementation of policies by school governance bodies as well as by irregular enforcement of non-

¹⁴ Human Rights Watch, *India- "They Say We're Dirty": Denying an Education to India's Marginalized,* April 2014, http://www.hrw.org/node/124684.

¹⁵ Ministry of Women and Child Development, Government of India, "Report of the Working Group on Child Rights for the 12th Five year Plan (2012-2017)," December 16, 2012, http://www.wcd.nic.in/reportwgdtdo1032012.pdf (accessed June 23, 2014).

¹⁶ Human Rights Watch, *South Africa-"We'll Show You You're a Woman": Violence and Discrimination against Black Lesbians and Transgender Men in South Africa*, December 2011, http://www.hrw.org/reports/2011/12/05/we-ll-show-you-you-rewoman.

discrimination policies by teachers, principals, and other school authorities. Our investigations found that poverty is one of the main factors that make lesbians vulnerable to violence. Lack of education is one of the factors that prevent lesbians from achieving social mobility.

Recommendations:

- Urge states to specifically address discrimination against LGBT people as an additional barrier to education for girls;
- Urge states to develop educational materials on gender identity and sexual orientation for use in schools and in teacher training material;
- Urge governments to ensure non-discrimination policies include sexual orientation and gender identity as a protected ground and establish monitoring systems to ensure effective implementation of non-discrimination policies.

Migrant and displaced women and girls

Migrant children, and migrant girls in particular, can experience particular difficulties accessing quality education appropriate to their needs. For instance, children who are forcibly displaced find their lives uprooted and have no schools to attend. Research from the Norwegian Refugee Council shows that internally displaced and refugee children often find themselves in camps without adequate numbers of places in school, or in schools without curriculum or language relevant to those children. Displacement causes particular barriers to learning: human resources may be lost and physical infrastructure destroyed; children may lose documentation during flight, preventing them from enrolling in new schools; and camps may have only makeshift schools, with local capacity overflowing. Girls can be particularly affected by lack of access to schools in displacement, in part because the increased insecurity can cause some parents to keep girls home.

Given that displacement can last decades, lack of education can affect entire generations. Education gives children meaningful day-to-day activities, making children less likely to succumb to the negative aspects of long-term displacement, including violence, recruitment, and forced labor.

Recommendations:

- Urge host states, donors, and humanitarian agencies to provide for continuity of education in planning for emergencies;
- Urge states to provide adequate provisions to ensure displaced girls' safety as they attend school.

¹⁷ Norwegian Refugee Council, "Learning in Displacement," November 2010, http://www.internal-displacement.org/assets/publications/2010/2010-learning-in-displacement-thematic-en.pdf (accessed June 23, 2014), introduction.

D) Primary measures supported with related, complementary measures to enhance the right of women and girls to education

Water, Sanitation, and Hygiene and Girls' Education

Lack of clean water and sanitation at home or at school can increase the risk for water-borne illnesses and diarrheal disease, and lessen the amount of time children are in school.¹8 Girls, however, suffer additional impacts from the lack of access to water, sanitation, and hygiene at home or at school, including absenteeism for collecting water or due to lack of adequate menstrual hygiene management and risks of violence. Girls should have access to clean water and sanitation facilities, as well as hygiene education and materials, to ensure their continued enrollment and attendance in school.

When water is not available in the house, the burden of collecting water outside of the household falls disproportionately on girls. The time spent collecting water may make girls late for school, or prevent them from attending at all. Though urban households may be closer to water sources than rural ones, wait times or long lines at boreholes or wells mean girls in urban areas may also experience similar negative impacts on educational opportunity due to collecting water for their households. In Harare, Zimbabwe, Human Rights Watch found that women and girls in urban areas are most often responsible for collecting water, and may have to endure long wait times at water points.¹⁹

When sufficient water is not available at home for adequate hygiene, children may face discrimination and stigmatization by teachers and classmates. For example, in India, Human Rights Watch found that teachers at some government schools called tribal children "dirty" and segregated them from other children because they did not have access to water at home for bathing before they left for school.²⁰ Girls may face additional stigma if they are not able to bathe regularly during menstruation.

Girls' attendance at school may decrease considerably if they do not have access to clean and safe water and sanitation facilities, and hygiene training and materials. Unsafe toilets can be a risk factor for sexual violence against girls in schools and elsewhere, discouraging

¹⁸ A systematic review of public health studies has shown that access to safe drinking water and clean, private toilets has potential to beneficially impact children's health, which in turn would increase attendance. See Christian Jasper, Thanh-Tam Le and Jamie Bartram, "Water and Sanitation in Schools: A systematic review of the health and educational outcomes," *International Journal of Environmental Research and Public Health*, vol. 9, no. 8, August 3, 2012, pp. 2772–2787, http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3447586/ (accessed June 23, 2014). Incidents of diarrheal disease can be reduced by 30 percent when children and staff at primary schools wash hands properly, according to one study. See Ejemot, R. Regina I., et al., "Hand Washing for Preventing Diarrhea," *Cochrane Database of Systematic Reviews*, no. 3, article no. CDoo4265, 2009, pp. 1–44, http://www.childsurvival.net/?content=com_articles&artid=498&alert=yes (accessed June 23, 2014).

¹⁹ Human Rights Watch, *Zimbabwe-Troubled Water: Burst Pipes, Contaminated Wells, and Open Defecation in Harare, Zimbabwe*, November 2013, http://www.hrw.org/reports/2013/11/19/troubled-water-o, p. 27.

²⁰ Human Rights Watch, "They Say We're Dirty," p 31.

girls' attendance.²¹ Further, private and clean sanitation facilities are essential to ensuring girls can manage their hygiene during menstruation, without disruption to their education. Human Rights Watch has found that menstrual hygiene management and accessible sanitation facilities are particularly important in enabling girls with disabilities to continue their education.²²

Recommendations:

- Urge states to provide quality hygiene education in schools to promote good hygiene behavior at home and in school, in an effort to reduce diarrheal and other communicable diseases;
- Urge states to ensure access to safe drinking water and clean, private, and safe sanitation facilities and hygiene materials in schools, including sanitary pads to enable girls to manage their hygiene during menstruation.

E) Women and girls' right to education in conflict

Attacks on Students, Teachers, and Schools

Female students, and teachers and schools that educate girls and women, have been deliberately targeted during times of armed conflict for various reasons. Armed groups have attacked, killed, and abducted female students because of opposition to girls and women receiving an education, or in opposition to adolescent girls and women receiving an education alongside boys and men. Teachers and schools that educate girls and women have come under attack for similar reasons, and also by groups who oppose certain forms or content of education, or who seek to impose certain forms of behavior, such as conformity to certain dress codes.²³ Advocates for girls' and women's education have also been attacked. Even when issues of gender do not motivate attacks on students, female students are more likely to suffer sexual or gender-based violence.²⁴

²¹ Human Rights Watch, *Scared at School* and Amanda Klasing (Human Rights Watch), "Menstrual Hygiene Day Links Periods and Human Rights" commentary, *WeNews*, May 28, 2014, http://www.hrw.org/news/2014/05/28/menstrual-hygiene-day-links-periods-and-human-rights.

²² Human Rights Watch, *Futures Stolen,* p. 37.

²³ Human Rights Watch, *Afghanistan- Lessons in Terror: Attacks on Education in Afghanistan*, July 2006, http://www.hrw.org/reports/2006/07/10/lessons-terror. Human Rights Watch, *Afghanistan- The 10-Dollar Talib and Women's Rights: Afghan Women and the Risks of Reintegration and Reconciliation*, July 2010, http://www.hrw.org/reports/2010/07/13/ten-dollar-talib-and-women-s-rights-o; Human Rights Watch Submission on the Combined Initial and Second Periodic Report of Afghanistan to the United Nations Committee on the Elimination of Discrimination against Women, July 2013; "Pakistan: Protect Students, Teachers, Schools From Attack," October 19, 2012. Human Rights Watch, *Pakistan-"Their Future is at Stake": Attacks on Teachers and Schools in Pakistan's Balochistan Province*, December 2010, http://www.hrw.org/reports/2010/12/13/their-future-stake.

²⁴ Mausi Segun (Human Rights Watch), "Girls' Abductions a Last Straw for Nigerians," commentary, *Salon*, May 7, 2014, http://www.hrw.org/news/2014/05/07/girls-abductions-last-straw-nigerians.

Recommendations:

- Urge states to act to protect students, teachers, and schools at risk of attack, including through the development of alternate means of education delivery;
- Urge states to credibly and impartially investigate and prosecute, in accordance with international standards, those individuals who threaten or attack students, teachers, schools, or universities;
- Create an advance rapid response system whenever there are attacks on schools, so
 that these facilities can be quickly repaired or rebuilt and destroyed educational
 material is replaced so that children can return to school as soon as it is safe and
 appropriate. During reconstruction, students should be provided education through
 alternative means and, where appropriate, given psychosocial support.

Military Use of Schools and Universities During Armed Conflict

Between 2005 and 2014, government armed forces and non-state armed groups have occupied and used schools and universities for military purposes in at least 23 countries with armed conflict. Schools have been converted into bases, barracks, detention centers, military training centers, and weapons and munitions caches. Sometimes the entire school is occupied, and sometimes only part of the schools is used, leaving students to either stay at home and forego their education or attend school potentially in the line of fire. Such military use of schools can last days, weeks, months, and in some cases even years. The use of schools for military purposes endangers students and teachers safety as well as their education. Girls studying alongside soldiers inside their schools may be sexually harassed, abused, and raped. Parents of girls are often particularly unwilling to send their girls to schools that are being occupied out of real or perceived concerns about such risks. Activities such as soldiers using school toilet facilities and excluding adolescent girls from using them also negatively affect girls' attendance and education.²⁵

Recommendations:

- Urge states to enact legislation and revise domestic military doctrine and policies to prohibit national armed forces and armed groups from using or occupying schools, school grounds, or other education facilities in a manner that violates international humanitarian law or the right to education under international human rights law;
- Highlight the *Lucens Guidelines for Protecting Schools and Universities from Military Use during Armed Conflict*²⁶ in the general recommendation as a guide to good practice.

²⁵ Global Coalition to Protect Education from Attack, "Lessons in War: Military Use of Schools and Other Education Institutions during Conflict," November 2012,

http://www.protectingeducation.org/sites/default/files/documents/lessons_in_war.pdf (accessed June 23, 2014), pp. 39-40. Human Rights Watch, *Thailand-"Targets of Both Sides": Violence against Students, Teachers, and Schools in Thailand's Southern Border Provinces*, September 2010, http://www.hrw.org/de/reports/2010/09/20/targets-both-sides. Human Rights Watch, *Yemen-Classrooms in the Crosshairs: Military Use of Schools in Yemen's Capital*, September 2012, http://www.hrw.org/reports/2012/09/11/classrooms-crosshairs.

²⁶ Global Coalition to Protect Education from Attack, "Draft Lucens Guidelines for Protecting Schools and Universities from Military Use during Armed Conflict," 2014, www.lucensguidelines.org.