



ASSESSING PUBLIC PARTICIPATION IN POLICYMAKING PROCESS





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ACRONYMS

- AoG** - Administration of Government of Georgia
CAP - Climate Action Plan
CSO - Civil Society Organizations
EU - European Union
FGD - Focus group discussions
GESI - Gender Equality and Social Inclusion
GOG - Government of Georgia
IDFI - Institute for Development of Freedom of Information
KII - Key Informant Interview
NDC - Nationally Defined Contribution
NGO - Non-governmental Organization
OECD - Organization for Economic Co-operation and Development
PCI - Public consultation index
Pwd – Persons with Disabilities
SIGMA – Support for Improvement in Governance and Management
UN – United Nations
UNDP - United Nations Development Programme

EXECUTIVE SUMMARY

The main purpose of this research is to evaluate the public participation aspect of the selected policy documents from the 2020 cohort. This study focuses on the process evaluation of public participation in policymaking rather than the outcomes of it. The objectives of this study were:

1. To assess compliance of the conducted public consultations with the new regulations;
2. To analyze the quality and usefulness of public consultations;
3. To identify the existing gaps and develop recommendations for improvement.

The research targeted all strategies and policy documents from the 2020 cohort, given their availability. Initially, the list of policy documents approved by the GoG included 21 documents. Throughout the process, it has been revealed that some strategies from the list either had not yet been implemented or their approval date, as well as the dates of the public consultation, had been postponed in 2021. Finally, the following eight strategy documents were covered within the framework of this research. Subsequently, 35 interviews and one observation were conducted to gather information and evaluate selected strategies in terms of the following six criteria: 1. Accessibility; 2. Openness; 3. Effectiveness of public consultation process; 4. Accountability; 5. Diversity of participants; 6. Public engagement.

Public Consultation Planning

The coordinating agencies had varying knowledge of the Rules of Procedures for Development, Monitoring, and Evaluation of Policy Documents (Resolution N629 of December 20, 2019). Most respondents were unaware of the existence or the contents of the Handbook that the Administration of the Government of Georgia made available in 2019.

In terms of resources, the coordinating agencies complained about the lack of human capacity to organize public consultations. Most of the time, public servants had limited availability and needed to find extra time to arrange public consultations. Moreover, CSOs believe that the coordinating agencies would receive multiple comments from different sources, which would require additional professional qualifications and capacity, namely data analysis skills, to run the process smoothly.

The effective implementation of public consultation is largely defined by the political will of the decision-makers to encourage public engagement as well as by the allocated resources. In many cases, the coordination bodies experienced a lack of human resources, which is directly linked to the logistical and analytical capacities to plan and carry out public consultations effectively. Furthermore, certain CSOs disapproved of the centralized decision-making affecting the public consultations.

Public Consultation Implementation

Most coordinating agencies lacked the understanding of what public consultation announcements entailed. Some coordinating agency representatives thought it was unnecessary to involve too many people in the strategy development. Consequently, they informed and engaged only those stakeholders with whom they already had affiliation. The announcements were mostly shared through the government agency websites, Facebook pages, and emails (in the case of closed engagement). Whenever the announcement was published on the website, anyone who wished to participate could access the invitation link. Most agencies have never had any selection

criteria for the participants of the public consultations and stayed open to anyone interested. In other cases, coordination agencies simultaneously used multiple platforms to announce the public consultations. Furthermore, some coordination bodies used the partner CSO resources to spread the word about public consultation announcements within their respective networks.

All announcements were disseminated at least one week before the event. Retrospectively, the participants had a poor recollection of the details included in the announcement; however, no one complained about the inadequacy of the information. The announcements were mostly disseminated in Georgian and, in some cases, in English as well, introducing accessibility challenges to diverse groups. **The language was the least considered factor in ensuring more inclusive public consultation announcements.**

Coordination agencies used different formats – online meetings, in-person meetings, website publishing, or email communication. Due to the COVID-19 related restrictions, the coordination agencies had to adapt their public consultation format accordingly. Overall, the research respondents assessed online meetings positively and suggested adopting a hybrid format even after the pandemic-related restrictions are lifted. According to these respondents, the hybrid format offers more accessibility, especially for the participants who cannot travel to attend events. Overall, the CSO representatives assessed the communication with coordination agencies very positively. Coordination agency representatives were open, responsive, and collaborative during the public consultations.

The research findings indicate that most of the coordination agencies took no specific measures to ensure diversity and inclusion of the participants. An equal representation of women and men was achieved accidentally. Other minority groups – such as people with disabilities, ethnic and/or religious minorities, LGBTQI+ community – either missed out completely or the data was not available to verify their participation level during the research. Increasing accessibility to the public consultation processes might be achieved through relying on local government resources to approach hard-to-reach groups. Another important strategy for ensuring the inclusion of ethnic minority groups is to increase language accessibility of the public consultation processes.

Accountability is another important aspect of a successful public consultation. According to the new Rules and Procedures, coordination agencies have to inform participants which comments were incorporated, and which ones were rejected with justified explanations. The coordinating agencies had a varying understanding of the reporting requirements and of what the summary report entailed. Also, there was a perception that report quality was linked to the richness of the comments collected during the consultation process. This confusion corresponds to the general lack of clarity regarding the summary report standards.

Overall, most of the CSO representatives mentioned that they received justified explanations of the accepted or rejected feedback in some format and on time, however, the quality of those feedbacks varied. It should be noted that the participants and the CSOs generally found their engagement and contribution to the public consultations imperative and meaningful. CSOs believe that their continuing engagement at all levels is essential as it ensures higher quality of the document.

Public Engagement and Interest in Public Consultations (from the perspective of coordinating agencies)

The context and topic of the strategy determined the size of the engaged audience. Furthermore, the pandemic-related restrictions caused disruptions in engagement. Some CSOs mentioned that they had to shift their limited resources to the community's needs, while others noted how switching to an online format made the working discussions less productive. The power relations within the public consultation group might have also affected the equal engagement of all participants.

Although the CSO's participation and input were assessed as very valuable, in some cases, their comments were completely out of context, so the coordinating agencies had to spend more energy and time to resolve them. Furthermore, some coordinating agencies mentioned the challenges associated with incorporating, connecting, and summarizing the comments received from multiple sources. Both coordinating agencies and CSOs claimed there was a shortage of knowledgeable participants willing to engage in the discussions. None of them mentioned making additional efforts to mobilize stakeholders outside of the already known groups.

Recommendations for the Administration of the Government of Georgia:

- **Enforce standards of implementation related to the public consultations:** to be done through awareness campaigns, events, active dissemination of materials, and training modules for the coordinating agencies.
- **Share the best local practices implemented by the coordinating agencies:** AoG could highlight the best local practices and allow the coordinating agencies to share their success stories with others through reflection workshops, meetings, or online platforms.

Recommendations for the Coordinating Agencies

- **Set up sector-based/thematic working groups to develop strategies:** An experienced stakeholder needs to facilitate the working groups to ensure the relevance and quality of the recommendations on a smaller scale.
- **Diversify and improve communication mechanisms:** a) Introduce mailing lists and newsletters, b) follow-up with CSOs individually, c) tailor announcements to the needs of the target audience d) promote open and transparent processes.
- **Engagement should commence on the strategy development stage:** The coordinating agencies should involve the stakeholders from the strategy concept phase, instead of only at the final stage of the strategy development.
- **Maintain a hybrid version of consultations even after the pandemic-related restrictions are lifted:** According to the multiple research participants, the availability of diverse participation formats will ensure a more inclusive public consultation process.
- **Hold public consultations on a municipal level:** Decentralize decision-making by organizing on-site public consultations in the municipalities.
- **Use more interactive formats:** In many cases, the attendees are not willing to speak up and express themselves freely. The coordinating agencies can mitigate the lack of participation by applying various tools to boost interaction. These could be small brainstorming sessions and ice-breaking activities.
- **Raise awareness of CSOs to promote engagement:** It is imperative to mobilize more stakeholders by taking concrete measures to spread awareness and ease the engagement.
- **Provide materials and information in minority languages:** The coordinating agencies need to consider the language factor while organizing inclusive and fair public consultations.
- **Promote diversity through dedicated efforts:** Coordinating agencies should be ready to accommodate diverse audiences in a proactive manner.
- **Accumulate and track diversity-related data:** Diversity data should be used to a) provide a statistical overview for the summary reports on the public consultations b) reach out to minority groups for future events.
- **Provide a policy brief/outline document as a faster feedback tool:** Coordinating agencies need to develop a shorter version (max. two pages) of the strategy document/action plan and gather responses from the participants.

INTRODUCTION

*"It is an undeniable reality that in today's network and information society people are both more assertive and more independent than in the past. This [...] means that the classical welfare state is slowly but surely evolving into a participation society."*¹ King of the Netherlands.

Since the end of the 20th century, democracy has been on the rise globally with the end of the Cold War; collapse of the Soviet Union and the decline of the authoritarian regimes in Latin America and Africa. These movements have granted citizens more leverage over political and socio-economic processes in their countries: firstly, by means of representation and secondly, through direct engagement in decision-making.

While governments in many states have a long history of consulting influential organized groups (e.g., trade unions or business associations) and public opinion makers, recent decades have seen an increase in demand for ordinary citizens' voice in policy choices. The preference currently is to the direct impact rather than the expert representation. This has occurred in parallel with the declining trust² in public institutions and increasing expectations towards quality of public services, delivery and transparency of policy development processes.³

Thus, engagement of the wider public in policymaking has become the generally accepted approach to achieve good governance in democratic states and the standard widely embraced by the international community. According to the UN 2008 Report *People Matter: Civic Engagement in Public Governance*,⁴ '**civic engagement**' is an essential governance norm, which can strengthen decision-making and invigorate accountability and transparency.

However, the opinions about what constitutes participation vary. The general idea of public engagement envisages some sharing of authority between governments and those they govern, acknowledging the right of citizens to have a say in the issues which affect their lives. Thus, the direction and intensity of interaction between the public and decision-makers are the key elements of this concept. However, there is no consent about the right degree of engagement. For instance, can the provision of information by governing bodies be regarded as participation when no input from citizens is sought? Or is consulting citizens a form of participation even when their opinions are not reflected in the policies? Maybe participation is only achieved when there is a co-production of decisions or groups of citizens have the authority to veto those decisions?⁵ How to select relevant interest groups? Would citizens always be willing to dedicate significant time and energy to serve on advisory boards, panels and councils, or their need for engagement could be satisfied simply by asking for an opinion or comment on particular issues?⁶

The following sections provide an overview of various definitions, terminologies, and participation frameworks described in the literature to establish an appropriate theoretical context for this study. This is followed by a description of both claimed and empirically confirmed benefits of public participation, along with the associated challenges. We then present some examples of participation mechanisms that are used in different countries. Afterward, the study considers legislative and practical aspects of public consultation in Georgia. This section ends with the description of the evaluation criteria for public consultations used in the current study.

1 Speech from the Throne, King of the Netherlands, 17.09.2013, English translation, <http://www.koninklijkhuis.nl>

2 World Economic Forum, <https://www.weforum.org/agenda/2019/04/institutions-trust-inertia-future-blockchain-dlt/> last accessed on 30/11/2020.

3 Bishop & Davis (2002). Mapping Public Participation in Policy Choices. *Australian Journal of Public Administration*, 61(1):14–29.

4 The United Nations, World Public Sector Report (2008). People Matter - Civic Engagement in Public Governance, <https://publicadministration.un.org/publications/content/PDFs/E-Library%20Archives/World%20Public%20Sector%20Report%20series/World%20Public%20Sector%20Report.2008.pdf> last accessed on 30/11/20.

5 Bishop & Davis (2002). Mapping Public Participation in Policy Choices. *Australian Journal of Public Administration*, 61(1):14–29.

6 Webler & Tuler (2002). Unlocking the Puzzle of Public Participation. *Bulletin of Science, Technology & Society*, 22(3): 179–189.

Definitions and Terminology

Definitions of public participation vary and different terms are often used interchangeably. In both academic papers and international publications, one can come across such terms as citizen engagement, citizen/civil/public participation, public involvement, citizen consultation, public dialogue, participatory democracy, etc. Given that there is no consent in the literature on what exactly constitutes participation in decision-making (see the Frameworks section), this report freely switches between the terms citizen engagement and public participation. It also uses several broad definitions of the concept. It should be noted, however, that **public consultation** in policymaking is considered to be a **subset** (or specific level) of a wider idea of participation as the Frameworks section describes in detail. Below, we provide several examples of alternative definitions used by the international community.

Organization/source	Definition
<i>World Bank</i>	"a process through which stakeholders influence and share control over development initiatives and the decisions and resources that affect them." ⁷ It regards consultation and listening as the prerequisites for full participation.
<i>UN Public Administration Glossary</i>	citizen participation "...implies the involvement of citizens in a wide range of policymaking activities, including the determination of levels of service, budget priorities, and the acceptability of physical construction projects in order to orient government programs toward community needs, build public support, and encourage a sense of cohesiveness within neighborhoods." ⁸
<i>The Encyclopedic Dictionary of Public Administration</i>	"process in which ordinary people take part – whether on a voluntary or obligatory basis and whether acting alone or as part of a group – with the goal of influencing a decision involving significant choices that will affect their community." ⁹
<i>The Council of Europe</i>	uses the term <i>civil participation</i> , which is defined as "the engagement of individuals, NGOs and civil society at large in decision-making processes by public authorities. Civil participation in political decision-making is distinct from political activities in terms of direct engagement with political parties and from lobbying in relation to business interests." ¹⁰

7 The World Bank Participation Sourcebook (1996) <http://documents1.worldbank.org/curated/en/289471468741587739/pdf/multi-page.pdf> last accessed on 30/11/2020.

8 UN Public Administration Glossary <https://www.un.org/esa/socdev/egms/docs/2013/EmpowermentPolicies/Elia%20Armstrong%20presentation.pdf>

9 Encyclopedic Dictionary of Public Administration https://dictionnaire.enap.ca/dictionnaire/docs/definitions/definitions_anglais/citizen_participation.pdf last accessed on 30/11/2020.

10 Council of Europe. Guidelines for civil participation in political decision-making (2017) https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016807509dd last accessed on 30/11/2020

OECD	<i>public consultation</i> as the “two-way communication process applicable at any stage of regulatory development and aimed at collecting views of interested and affected parties with the purpose of improving quality of the regulation.” ¹¹
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As can be observed, there are common elements in most of the provided definitions, namely, they imply input from the public and mention the influence that individual citizens or interest groups gain over the final outcome (i.e., a decision or policy), which directly affects their lives/communities. The degree of this influence and intensity of engagement are discussed next through the theoretical frameworks of participation.

Participation Frameworks

Perhaps the most widely known model in the field of citizen participation was proposed by Sherry Arnstein in the late 1960s: *A Ladder of Citizen Participation*¹² has been a touchstone for the researchers and practitioners in the field (including policymakers and community activists) for the decades to come. In her work, Arnstein uses the ladder metaphor with eight levels (or rungs) from the lowest – Manipulation, in which there is no participation; through Consultation, which involves some engagement; to the highest – Citizen Control, where citizens gain the highest degree of power over decision-making (see Fig. 1). As Fig. 1 illustrates, Arnstein, who created her model from the perspective of community activists, skeptically classifies the Consultation as tokenism. Indeed, although this form allows the government to seek citizens' opinions on a certain issue, it retains full discretion as to whether to consider or ignore those opinions.

Arnstein's ladder has attracted increasing criticism for portraying participation as a “power struggle between citizens trying to move up the ladder and controlling [organizations] and institutions (intentionally or otherwise) limiting their ascent to the ‘top’ and barring citizen's ability to claim control or power for themselves.”¹³ It assumes that participation is a continuum in which achieving “citizen control” is an ultimate goal, i.e., until direct democracy is achieved, no meaningful participation can occur. This assumption does not always align well with the reasons behind people's engagement in decision-making.¹⁴ Likewise, a researcher Carole Pateman¹⁵ proposed a similar approach, which distinguishes between pseudo, partial and full participation, claiming that for people to influence the decision outcomes, the real transfer of power from government to citizens must occur. Both models hence presume that policies or decisions are constant, whereas the approach to participation by decision-makers is the only variable that changes. This approach oversimplifies the process as policy problems could be different in nature and thus, require different forms/types of engagement.¹⁶

John Clayton Thomas offers an alternative perspective. He suggests that the government should classify decisions and policies into different categories and select suitable methods of participation accordingly. The researcher claims that citizen engagement is not a virtue per se, rather the issue at hand should prompt

11 OECD Background Document on Public Consultations <https://www.oecd.org/mena/governance/36785341.pdf> last accessed on 30/11/2020

12 Arnstein (1969). A Ladder Of Citizen Participation. *Journal of the American Institute of Planners*, 35(4): 216-224 <https://www.tandfonline.com/doi/abs/10.1080/01944366908977225> last accessed on 30/11/2020.

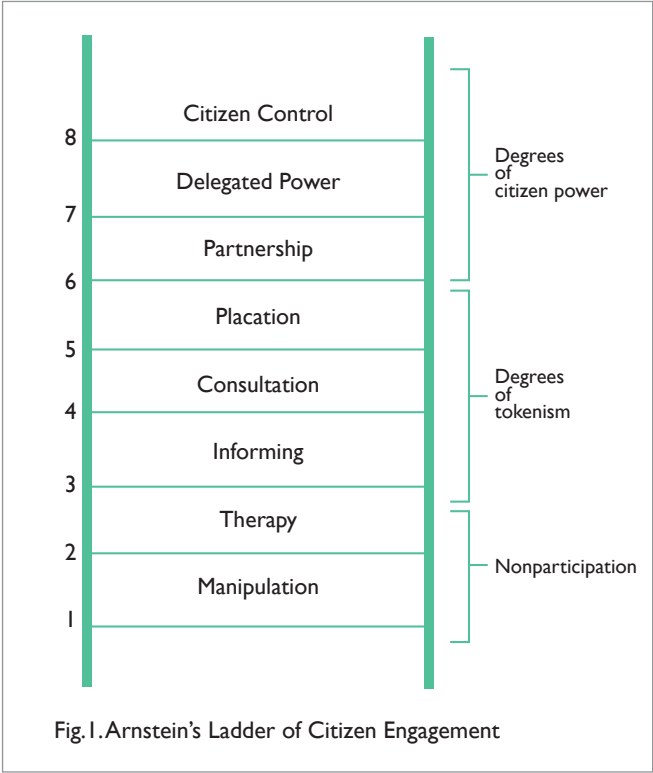
13 Collins, Kevin and Ison, Raymond (2006). Dare we jump off Arnstein's ladder? Social learning as a new policy paradigm. In: *Proceedings of PATH (Participatory Approaches in Science & Technology) Conference*, 4-7 June 2006, Edinburgh.

14 Tritter & McCallum (2006). The snakes and ladders of user involvement: moving beyond Arnstein. *Health Policy*, 76:156-168.

15 Pateman (1970) *Participation and Democratic Theory*, Cambridge University Press, Cambridge.

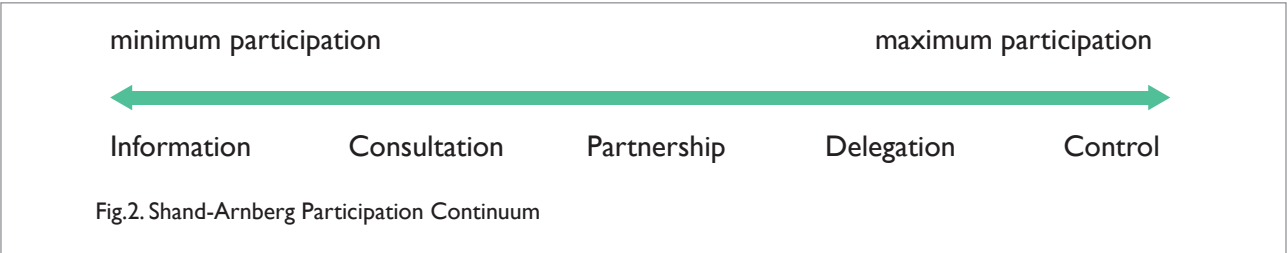
16 Bishop & Davis (2002). Mapping Public Participation in Policy Choices. *Australian Journal of Public Administration*, 61(1):14-29.

the need for and desired level of involvement. He distinguishes between five types of managerial decisions, starting from those which could be taken autonomously, with zero involvement, to those which require various degrees of consultation with interest groups or the general public, and ending with the *public decision*, where joint decision-making takes place. Thomas also provides examples of participation forms, which can be applied in each case, such as meetings with key stakeholders vs public meetings or citizen surveys.^{17 18}



The third approach to participation can be found in the OECD's Responsive Government: Service Quality Initiatives. Researchers Shand and Arnberg also see participation as a continuum from minimal to full involvement (Fig 2)¹⁹. However, unlike Arstein's ladder in which only the highest level is meaningful, this model links participation options to the government objectives and the issues it wishes to resolve (thus, the model adopts the government perspective). For example, when the goal is only to educate the public about an issue or a need for regulation, public information campaigns may be sufficient. However, as we move along the continuum, consultation already involves two-way information exchange, discussion, and collection of diverse views, although the decision-making responsibility stays with the government. The partnership envisages a certain degree of joint decision-making, for instance, by engaging advisory boards. In delegation, a group of community representatives (e.g., a CSO coalition) makes decisions within the framework defined by the government. At the highest level,

full control over the decision-making is in the hands of citizens, usually through direct referenda, which can only be implemented in rare cases due to the amount of effort and resources it requires.



Bishop and Davis have built upon the third model yet offered the modification. While using the same categories, they propose to avoid placing them along the single axis with minimum and maximum points but treat them as independent discontinuous choices. They claim that the nature of the problem or decision, local context, as well as available resources, should determine the necessary degree of involvement and form of participation, with no form being superior over the other as long as it serves the purpose. “Participation is shaped by the

17 Thomas, (1990). Public Involvement in Public Management: Adapting and Testing a Borrowed Theory, *Public Administration Review*, 50(4):435–45.

18 Thomas, (1993). Public Involvement and Governmental Effectiveness: A Decision-making Model for Public Managers, *Administrative Science and Society*, 24(4):444–69.

19 Shand & Arnberg (1996). 'Background Paper' in *Responsive Government: Service Quality Initiatives*, Organisation for Economic Cooperation and Development.

policy problem at hand, the techniques and resources available and, ultimately, a political judgment about the importance of the issue and the need for public involvement.”²⁰ They also propose possible instruments for each form of participation. For instance, the consultation could be implemented by communicating with key contacts, circulating proposals using information technology, holding interest groups or public meetings, etc.

International organizations and donors have adopted and adjusted these frameworks. For instance, the World Bank relies on the International Association for Public Participation’s Spectrum of Public Participation (see Fig. 3), which includes different levels of interactions from informing, through consultation, involvement, and collaboration to empowerment. The lowest level – informing, which envisions only one-way communication, is not considered to be the full-scale citizen engagement, although its importance as a pre-condition for engagement is acknowledged. Thus, according to the WVB Framework, citizen engagement starts at the consultation stage given that there is a two-way interaction and concrete response to citizen feedback is ensured.²¹

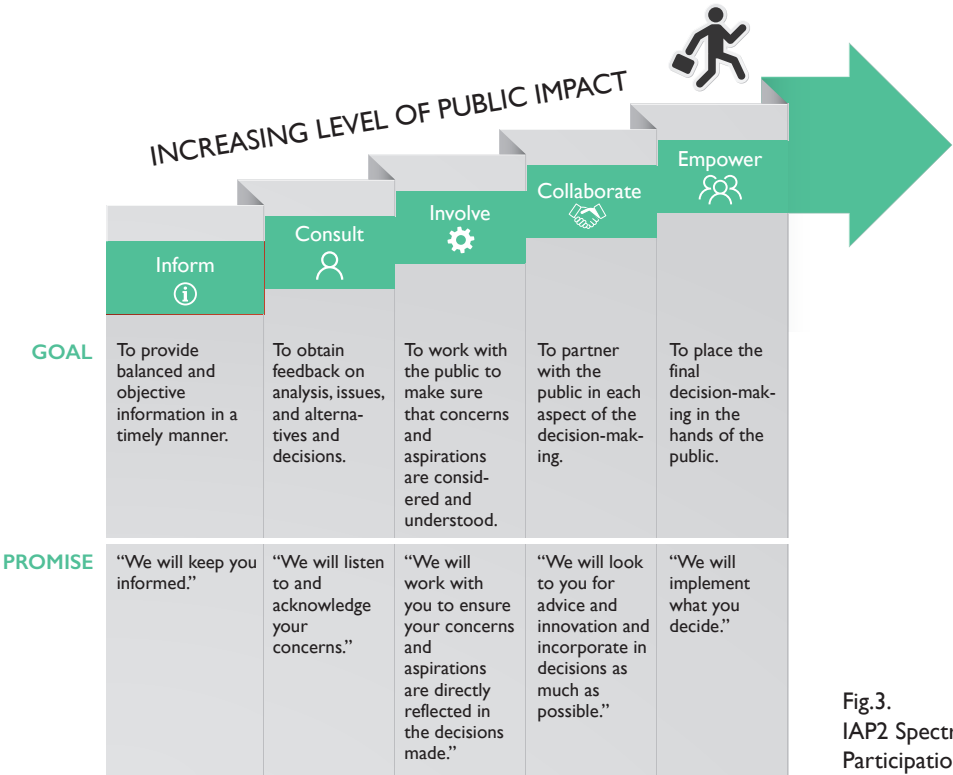


Fig.3. IAP2 Spectrum of Public Participation

Similarly, the Council of Europe distinguishes four levels of participation based on intensity, from passive to more active: Information, Consultation, Dialogue and Partnership. The partnership is the highest level of participation, with shared responsibility and joint decision-making at each step of policy development and implementation.²²

The lessons which follow from the analysis of these models are that participation purposes vary and there is no one-size-fits-all type of participation. While no framework regards a mere provision of information as a satisfactory level of involvement, there is less consensus regarding the other levels of participation. Public institutions have to consider the type of decision being made and particular circumstances in each case. Moreover, since it is practically impossible to engage everybody in the policymaking process, special attention should be paid

20 Bishop & Davis (2002). Mapping Public Participation in Policy Choices. *Australian Journal of Public Administration*, 61 (1):14–29.

21 The World Bank, Strategic Framework for Mainstreaming Citizen Engagement in World Bank’s Operations, <https://openknowledge.worldbank.org/bitstream/handle/10986/21113/929570WP0Box380ategicFrameworkforCE.pdf?sequence=1&isAllowed=y> last accessed on 30/11/20.

22 Council of Europe, Code of Good Practice for Civil Participation in the Decision-Making Process (2009). *Conference of INGOs*, <https://rm.coe.int/16802eed5c> last accessed on 30/11/20.

to selecting representative interest groups and the right balance must be found between involving too many or too few.²³ This, again, will depend on the depth of involvement required.

With regards to the **public consultation**, the observed models view it as a form of participation which falls somewhere between the autonomous decision-making by government and full control over the outcome by the citizens. Public consultations are the most widespread form of participation which the OECD countries use in their policymaking, with some countries adopting special protocols to guide the process.²⁴ The meaningfulness of a consultation depends on its real purpose, process (how it is conducted), motivation of those involved and its outcome, i.e., whether it is implemented solely to meet formal requirements (as claimed by Arnstein) or there is a sincere desire to discuss an issue with stakeholder groups to improve the quality of a decision, ensure an inclusion of the opinions of people affected by the policy. Thus, it is reasonable to conclude that public consultations can be regarded as a substantial method of citizen engagement if enough effort was taken to engage relevant stakeholders, citizen input was actively sought, and participants have (at least partially) contributed to the outcome: policy or decision.



Benefits and Challenges of Citizen Engagement

Countries with liberal democratic systems have come to acknowledge that citizens have a right to voice their opinion in decisions and policies that affect them. In recent decades, people around the world have started to demand more transparency and accountability from government decision-making, an opportunity to have a voice in policy choices as they rightfully question whether the elected governments/officials properly represent their needs and interests. This has led to an increasing tendency towards more direct forms of involvement of wider public and community groups/organizations in the policymaking process, while the international community has widely accepted citizen engagement as an important principle of good governance.

Citizen engagement is claimed to provide multiple benefits both to the process of policymaking and to its outcomes. The advantages stated by various international organizations and scholars are summarized below:^{25 26 27}

1. Citizen engagement and public consultation provide additional information and expertise, new ideas and perspectives to the government, which helps to set appropriate priorities, provides a wider choice of viable policy options, helps co-create solutions and, consequently, can lead to higher quality or even more cost-effective decisions.
2. It helps the government to gather sometimes conflicting opinions and try to balance them.
3. It may reveal unintended consequences and risks to policy implementation.
4. When the citizens and interest groups are actively involved in the policymaking and their preferences are reflected in the resulting regulations, credibility and legitimacy of the decisions increase, while people feel ownership, which leads to higher compliance with the regulation, more effective implementation, and lower costs of enforcement.
5. It increases transparency and accountability of policymaking processes and helps to build public trust in government, form partnerships, and allay hostility.

Moreover, in recent years, international organizations like the United Nations and the World Bank have been advocating participation as a tool which could lead to better developmental outcomes and more equitable

23 Spijkers & Honniball (2015). Developing Global Public Participation (1) – Global Public Participation at the United Nations, *International Community Law Review*, 17 (3): 222-250.

24 Bishop & Davis (2002). Mapping Public Participation in Policy Choices. *Australian Journal of Public Administration*, 61 (1): 14–29.

25 OECD - Background Document on Public Consultation <https://www.oecd.org/mena/governance/36785341.pdf> last accessed on 30/11/20.

26 Kerley & Starr (2000). Public Consultation: Adding Value or Impeding Policy? *A Journal of Policy Analysis and Reform*, 7(2): 185-192.

27 Irvin & Stansbury (2004). Citizen Participation in Decision Making: Is It Worth the Effort? *Public Administration Review*, 64: 55-65.

societies through the inclusion of interests of disadvantaged and poor, as well as help governments to attain Sustainable Development Goals.

The literature has also put forward the following challenges to citizen participation: time-consuming and costly process, unfair representation, i.e., it is hard to reach all those affected by the policy and thus only those with strong stakes participate, which may lead to exploitation of the process and bias, lack of commitment/involvement from the citizens (due to lack of time or trust), failure to reach consensus resulting in more hostility, loss of control over decision-making, wrong decisions or decisions which are impossible to implement.²⁸

Some researchers have tried to critically evaluate empirical evidence from various countries to test whether the claimed benefits of participation have been realized in practice. For this purpose, Gaventa and Barrett²⁹ have performed the meta case-study analysis of 100 cases from 20 countries examining over 800 outcomes of citizen engagement grouped into four areas: construction of citizenship (creation of more empowered and informed citizens), strengthening practices of participation, strengthening responsive and accountable states and development of inclusive and cohesive societies. Overall, they found that 75% of outcomes in their sample were positive and about 25% negative, concluding that there is strong evidence to the claims that citizen engagement leads to the desired developmental and democracy-building outcomes. They further investigated how the type of engagement and national political context have affected the outcomes and made an interesting conclusion. In particular, there was no direct linear relationship between the “success of participation” and “level of democratization”, hence the participation could be equally successful or challenging in both long-established democracies and countries with weak democratic traditions.

The World Bank’s Strategic Framework³⁰ also provides an overview of the literature, which suggests that citizen engagement, given the existence of the necessary pre-conditions, can lead to better long-term and intermediate developmental outcomes. These include improved service delivery, better governance (higher transparency, responsiveness to citizens’ needs, and reduced corruption), enhanced financial management, and social inclusion of the vulnerable. However, social, political, economic, and cultural factors, as well as governments’ and citizens’ capacity and commitment to participation, can greatly influence the outcomes of citizen engagement.

The conclusion is thus the following: “The main challenges of civic engagement usually stem from the complexities of management of participation; who should participate and how; and how to translate participation inputs to policies and programmes.”³¹ Consequently, political commitment and clearly defined rules and procedures for citizen engagement, selection of the suitable participation forms for each particular purpose, and making the best effort to ensure maximum inclusiveness of those affected, can help overcome the difficulties.

Public Participation Mechanisms and International Practice

Different instruments and mechanisms for public engagement and in particular public consultations are used around the world. According to the World Bank Guidelines,³² they may include:

- Written submissions
- Public hearings or face-to-face meetings
- Focus group discussions with particular types of stakeholders

28 Irvin & Stansbury (2004). Citizen Participation in Decision Making: Is It Worth the Effort? *Public Administration Review*, 64: 55-65.

29 Gaventa & Barrett (2012). Mapping the Outcomes of Citizen Engagement, *World Development*, 40 (12): 2399-2410.

30 The World Bank, Strategic Framework for Mainstreaming Citizen Engagement in World Bank’s Operations, <https://openknowledge.worldbank.org/bitstream/handle/10986/21113/929570WP0Box380ategicFrameworkforCE.pdf?sequence=1&isAllowed=y> last accessed on 30/11/20.

31 The United Nations, World Public Sector Report (2008). People Matter - Civic Engagement in Public Governance, <https://publicadministration.un.org/publications/content/PDFs/E-Library%20Archives/World%20Public%20Sector%20Report%20series/World%20Public%20Sector%20Report.2008.pdf> last accessed on 30/11/20.

32 The World Bank Group (2019). Consultation Guidelines, <http://pubdocs.worldbank.org/en/248301574182372360/World-Bank-consultations-guidelines.pdf> last accessed on 30/11/20.

- Structured surveys
- Web-based consultations and interactions (surveys, questionnaire, comments, social media tools and channels, including web forums, blogs, Twitter)
- Advisory groups and expert groups

The World Bank recommends selecting the instruments based on the issue at hand, the purpose of consultation, consideration of stakeholders engaged, scope and allocated timeframe.

The EU has also developed principles and minimum standards for participatory decision-making, which are outlined in the official Communication from the European Commission (2002)³³ aimed at reinforcing the culture of consultation and dialogue in the EU by promoting direct contact between the Commission and various interest groups. For example, the European Commission has created a common webpage for public consultations,³⁴ which gives access to the information about all on-going and completed public consultations by thematic area. A special questionnaire is created on each topic, which ensures a standardized approach and simplified statistical processing of data. The results of the consultations are summarized in the publicly accessible consultation report. The online portal allows public bodies to assess citizens' attitudes towards an issue at the first stages of policy development and decide whether to move forward. Additionally, for a deeper engagement with the stakeholders, the EU institutions conduct targeted consultations with the interest groups. For this purpose, a publicly available unified stakeholder database³⁵ has been created, where every EU-based non-profit-making civil society organization could register itself.

The Council of Europe also widely promotes citizen engagement among its member states. In 2017, the Guidelines for Civil Participation in Political Decision Making³⁶ were adopted to strengthen and facilitate participation by individuals, community groups, and civil society organizations. The document also includes a long list of specific recommendations (as annexes) for the engagement of various target groups, such as young people or people with disabilities.

Some of the widely used practices in the EU as well as in the UK and US are white and green papers. **The green paper** is a consultative document, which aims at starting a discussion around a public policy or issue. The green paper may include several alternatives for solving the problem and provides the public with an opportunity to become acquainted with and consider possibilities for solving an issue. The green paper may pave the way for legislative changes. **White paper**, on the other hand, is a public policy document, which contains specific draft legislative/regulatory changes subject to a discussion with stakeholders and interest groups. The content of a white paper may be updated as the result of public consultations, before initiation in the Parliament.

In most recent years, various innovative approaches, such as **representative deliberative processes**, have become more and more widespread in the OECD countries.³⁷ According to the OECD, deliberative processes imply engaging a randomly selected, representative group of people from a community, which will dedicate significant time to collaborating and producing recommendations on a policy issue through facilitated deliberation. This can be implemented through various models, for instance, citizens' jury/panel (the most popular), citizens' dialogue, assembly, council, deliberative opinion polls, consensus conferences, etc. With these initiatives, it is essential to consider the purpose, depth of recommendations required, complexity and importance of the issue, as well as the costs associated with the process.

33 Communication from the Commission - Towards a reinforced culture of consultation and dialogue - General principles and minimum standards for consultation of interested parties by the Commission, 11.12.2002 COM(2002) 704 final https://ec.europa.eu/governance/docs/comm_standards_en.pdf last accessed on 30/11/20.

34 https://ec.europa.eu/info/consultations_en last accessed on 30/11/20.

35 European Commission CONECCS Database https://powerbase.info/index.php/European_Commission_CONECCS_Database last accessed on 30/11/20.

36 Council of Europe, Guidelines for civil participation in political decision making (2017) https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016807509dd last accessed on 30/11/20.

37 OECD, Innovative Citizen Participation and New Democratic Institutions – Catching the deliberative wave (2020) <https://www.oecd.org/gov/open-government/innovative-citizen-participation-new-democratic-institutions-catching-the-deliberative-wave-highlights.pdf> last accessed on 30/11/20.

PUBLIC CONSULTATIONS - GEORGIAN CONTEXT

Active engagement of citizens in the public policymaking process has been declared a priority by the Government of Georgia as evidenced by a number of strategic documents. These include the EU-Georgia Association Agreement Agenda 2017-2020, Sustainable Development Goal 16 (nationalized), Public Administration Reform Roadmap 2020 and its 2019-2020 Action Plan, Open Government Partnership Action Plans, Aarhus Convention.³⁸ Moreover, the participation of citizens and stakeholder in decision-making is regulated by the following legislation: the Constitution of Georgia,³⁹ General Administrative Code of Georgia,⁴⁰ Local Self-Government Code of Georgia,⁴¹ Law of Georgia on Structure, Authority and Regulation of Activity of the Georgian Government,⁴² and various normative acts.

Nevertheless, until recently, no systematic approach existed to ensure effective public participation in the policymaking process, while the existing regulations were general and non-mandatory. In 2018, the Baseline Management Report on the Principles of Public Administration in Georgia - Policy Development and Coordination, produced by the OECD/SIGMA, assessed whether the existing regulations and practices on drafting policy documents and legislation adhered to the principle of inclusiveness and allowed active engagement of the wider public. They concluded that the regulatory framework was rather vague and non-binding – without clear rules and guidelines as well as there was no established mechanism to ensure the quality of public consultations. Although some dialogue and consultation with the civil society took place through various working groups and advisory councils, it required direct invitation, thus engagement of the wider public was not possible. As a result, Georgia received a score of 0/41 on the “public consultation on public policy” indicator in the *Principles of Public Administration Policy Development and Co-ordination* report.⁴³

Moreover, in 2019, the Open Government Permanent Parliamentary Council (with the help of the IDFI and the UNDP), produced a thematic research report called *Legislation and Practice of Citizen Participation in the Process of Public Policy Development*.⁴⁴ This report included a comprehensive overview of the existing legislation, the study of various practices used by different public institutions as well as the list of recommendations. The research revealed that regulatory framework did not ensure citizen engagement at the early stages of policy development; there was no unified, obligatory standard for public participation in the discussions of draft policy documents; public entities, which authored the draft legislation, were not required to provide information to the Administration of the Government regarding the activities implemented for public involvement; while the requirement to publish certain draft laws two weeks before their initiation in Parliament was considered a rather passive form of informing

38 Aarhus Convention was ratified by Georgia on 30/10/2001 <https://matsne.gov.ge/ka/document/view/1210443?publication=0> last accessed on 30/11/20.

39 The Constitution of Georgia, Article 77, Point 3, pg. 31.-33 <https://matsne.gov.ge/ka/document/view/30346?publication=35> last accessed on 30/11/20.

40 General Administrative Code of Georgia, Article 72 - Point 1-c; Article 103- Point 1; Article 115 – Point 2, Article 117-118 and 120. <https://matsne.gov.ge/ka/document/view/16270?publication=32> last accessed on 30/11/20

41 Local Self-Government Code of Georgia <https://matsne.gov.ge/ka/document/view/2244429?publication=44> last accessed on 30/11/20.

42 Law of Georgia on Structure, Authority and Regulation of Activity of the Georgian Government, Article 29 https://matsne.gov.ge/ka/document/view/2062?publication=38#part_59 last accessed on 30/11/20.

43 The Principles of Public Administration Policy Development and Co-ordination - Georgia, SIGMA Programme, 2018, pg. 40, <http://www.sigmaxweb.org/publications/Baseline-Measurement-Report-2018-Georgia.pdf> last accessed on 30/11/20.

44 Legislation and Practice of Citizen Participation in the Process of Public Policy Development, Open Government Permanent Parliamentary Council Thematic Research Report, 2019 http://www.parliament.ge/ge/ajax/downloadFile/129894/%E1%83%97%E1%83%94%E1%83%9B%E1%83%90%E1%83%A2%E1%83%A3%E1%83%A0%E1%83%98_%E1%83%9B%E1%83%9D%E1%83%99%E1%83%95%E1%83%9A%E1%83%94%E1%83%95%E1%83%98%E1%83%A1_%E1%83%90%E1%83%9C%E1%83%92%E1%83%90%E1%83%A0%E1%83%98%E1%83%A8%E1%83%98 last accessed on 30/11/20.

the public as those drafts were already agreed at the government sitting by the time of publishing. Regarding the existing practices, the study concluded that they varied considerably among the different ministries as well as within the same ministry with respect to different policies. Advisory bodies (councils and committees) existed at every ministry, although their mandate and composition differed, moreover, there was neither an obligation to include representatives of civil society or the private sector, nor a mechanism to ensure accountability of their activities. Often, the public institutions considered merely informing the public regarding already approved policies as participation. The report produced the following major recommendations:

- To create the common standard for public engagement in the policymaking, which would comprise of both passive (inform) and active (discussion) mechanisms of engagement;
- To make public consultations mandatory for all strategies and annual action plans;
- To make an obligatory provision of substantiated feedback to the individuals and organizations that have offered advice on the policy;
- To document, include as an annex to the policy document, and make available upon request to all interested parties the activities implemented for the purpose of public consultation;
- The Administration of the Government needs to ensure training of different ministries on the new standards and regulations;
- It is advisable that the Administration of the Government creates a unified online portal (according to the EU standards) for public consultations, where the information regarding all ongoing and completed public consultations will be provided;
- It is advisable that the Administration of the Government creates a publicly available database of all stakeholders (associations, civil society organizations, etc.) for their direct engagement in policy consultations. Any interested civil society organization should be able to register and add information in the database;
- To develop a public communication strategy that would include the methods and approaches for reaching out to the wider public at each stage of policy development.

In response to the identified gaps, the Georgian government elaborated the Rules for Development, Monitoring and Evaluation of Policy Documents,⁴⁵ which were adopted at the end of 2019, making it mandatory for public consultations on any national and sectoral policy (except for the documents that concern national security) before its approval by the government.

Specific guidelines and requirements⁴⁶ towards public consultations were also elaborated by the AoG. The rules apply to all policy documents to be adopted in 2020 and afterward. These include a) the obligation to provide written response to every stakeholder, explaining in a substantiated manner which recommendation was considered, partially considered, or rejected in the final policy document and b) the requirement to prepare a summary report regarding a conducted public consultation and include it as an annex to the policy presented to the Government of Georgia for enactment. The minimum standards regarding the information to be incorporated in the public consultation announcement, as well as a summary report, are also defined in the document. In particular, the summary report on public consultations must contain at least the following:

1. Information about the conduct of public consultations (format, venue, time, number, the channel of communication).
2. Information on participants (total number), agreements on recommendations or proposals that were taken or not taken into account.

45 Decree of Government of Georgia #629 (December 20, 2019) on Approval of the Rules of Policy Planning, Monitoring and Evaluation. <https://matsne.gov.ge/ka/document/view/4747283?publication=0> last accessed on 30/11/20.

46 Policy Planning, Monitoring and Evaluation Handbook, Administration of the Government of Georgia, Section 3.5, pg. 36-37. https://www.ge.undp.org/content/georgia/en/home/library/democratic_governance/PolicyDevelopmentHandbook.html last accessed on 30/11/20.

It should also be mentioned that a number of issues discussed in the Handbook are more of recommendations than obligations. For instance, coordinating institutions are encouraged to engage the public at every stage of a policy cycle, yet public discussions of only a final draft are mandatory. Likewise, the Handbook recommends making every effort to engage all stakeholders in the field and use various means of communication to notify them about consultations reasonably in advance, which leaves plenty of room for misinterpretation. The assessment's focus is on the outcome of the public consultations rather than the process. As discussed with the AoG representative, this approach was chosen taking into account the availability of the monitoring mechanisms over coordinating institutions at hand of the Administration of the Government.

Furthermore, not all recommendations that the described research studies provide have been implemented. For instance, as of today, there is neither a unified online portal for public consultations nor a database of the potential stakeholders and civil society representatives in different sectoral fields.

Nevertheless, the obligation to conduct public consultations before the adoption of a policy document as well as the proposed minimum requirements are important first steps to giving the Georgian citizens more voice in the policymaking process. Considering that this is a very recent initiative, it remains to be seen how well the recommendations could work in practice. One of the objectives of the current study is to evaluate the quality of the public consultations regarding the policies to be adopted in 2020, regulated by the Decree of the Government of Georgia N629 (December 20, 2019).

HOW TO EVALUATE PUBLIC PARTICIPATION?

Assessment of participation is important for all parties involved, be that government bodies, sponsors or donors of the process, direct participants, or potentially affected citizens. The major question is usually to judge if the exercise was worth the effort. However, assessing the value of public participation is also a complex task, as participation mechanisms, purposes, and contexts vary significantly, and there is no standard scientific approach or set of assessment criteria available. A lot would depend on the definition of *effectiveness* or *quality* of public participation. Several criteria could be used, such as the number of ideas produced, quality of those ideas, speed of decision-making, and whether the final decision reflects group consensus. Some of these criteria may turn out incompatible with each other. Furthermore, the effectiveness can be judged differently depending on whether democratic or economic considerations are prioritized and whose perspective is adopted – government institutions', process participants' or wider stakeholders', whose interests the participants represent. An additional complication arises when deciding on whether to focus on the **process** effectiveness (e.g., well-organized, fair, inclusive, deliberative, satisfactory to participants, etc.) or the **outcome** effectiveness (level of influence of participants on a decision, cost-effectiveness, consensus-based, reduces subsequent judicial challenges, implementable, etc.).⁴⁷ Given the absence of a common approach, different scholars operationalize the effectiveness of public participation using the criteria which better serve the purposes of their research. In the current study, we decided to adopt a similar tactic. In particular, we have carefully considered different perspectives and focus areas in the literature as well as within the Georgian context to come up with the following criteria for evaluation of public consultations:

1. Compliance with the minimum requirements of the Administration of the Government of Georgia (as the *Public Consultations - Georgian Context* subsection describes).
2. The meaningfulness and quality of the consultations are assessed by the following criteria:
 - a) The relevance of participants involved (e.g., are they affected by the policy, do they adequately represent the interests of those affected, do they have sector knowledge?)
 - b) Accessibility: was a policy accessible for individuals and stakeholders from various backgrounds? How many formats were used to reach out to the public and collect opinions (one vs. multiple)? Was a policy's digital copy published online at any stage of development for the wider outreach? Which languages (only Georgian or also English and minority languages) and style (easily comprehensible) were used?
 - c) Stage of engagement: was the public consulted only on the final draft or the citizens/CSOs were also involved at earlier stages of policy development (e.g., determination of priorities)?
 - d) The satisfaction of participants with the **process** of consultation (quality of interaction and transparency of the process). For example, do they feel they have been properly notified, provided with sufficient information, given enough time to provide feedback, provided with a justified response if their opinion was not reflected, etc?
 - e) The satisfaction of participants with the **outcomes** of consultation – the impact they had on the final policy, i.e., degree of reflection of their feedback.
 - f) The satisfaction of the coordinating institutions with the process and outcomes of public consultations (motivation and interest of the participants, a number and quality of ideas generated, etc.)

The aforementioned evaluation criteria have formed the basis for the research methodology presented in the subsequent sections.

47 Rowe & Frewer, (2004). Evaluating Public-Participation Exercises: A Research Agenda. *Science, Technology, & Human Values*, 29(4): 512–556.

PUBLIC CONSULTATION INDEX (PCI)

The presented **Public Consultation Index (PCI)** assesses process evaluation of the public consultations. It focuses on the process, rather than the outcome. Considering the challenges and the lack of a common approach for evaluating the effectiveness or quality of the public consultations, the presented Public Consultation Index was drafted in the approximation of the best practices outlined in the literature and struttingly applied to the Georgian context. The index aims to identify strengths and weaknesses in public consultation implementation and convergence towards good international practices and the relevant local standards. In addition, the PCI allows for a comparison across policy documents and assessment of the coordinating agencies' conduct. It also aims to support relevant authorities and stakeholders in setting public consultations' best practices and generating conditions for a partnership and policy dialogue. Besides, the indicators are based on the best international guidelines, and several of them (ex. regarding diversity) are not mandatory under the Georgian regulations.

However, it has to be underlined that the Index is not comprehensive and may be updated, corrected, or revised. It is based on limited data and should be seen as a preliminary result of a pilot study. The policy documents are scored based on the information provided by the subjects of this study: coordinating agencies and CSOs. Thus, the research group does not assume any responsibility for the truthfulness, completeness, or correctness of the interviewees' opinions that may have resulted in scoring errors.

The index is composed of six criteria: accessibility, openness, the effectiveness of the public consultation process, accountability, diversity of participants, and public engagement/interest. The first five criteria assess **the coordination agency efforts for each public consultation process** from CSOs perspective and its compliance with the relevant standards as outlined in the literature review. Since public consultation is a two-way communication process between authorities and individuals, NGOs and civil society, the sixth criterion **Public engagement/interest** and corresponding indicators reflect coordinating agencies' perspectives to make the process of evaluation fair. Each criterion has specific indicators.

Criteria 1: Accessibility	Criteria 2: Openness	Criteria 3: Effectiveness of public consultation process
<p>1.1. Announcement disseminated was accessible for diverse groups (language accessibility, clarity, etc.)</p> <p>1.2. Announcement and/or policy brief were disseminated through multiple channels</p> <p>1.3. Policy document/brief was accessible for diverse groups (language accessibility, clarity, etc.)</p> <p>1.4. Process was adapted to the needs of diverse groups (pwd, ethnic minority, etc.)</p>	<p>2.1. Announcement on public consultations was openly available</p> <p>2.2. Policy document/brief was publicly available</p> <p>2.3. Opportunity to participate in public consultation was open to anyone interested</p> <p>2.4. Everyone involved/registered had an opportunity to provide feedback on a policy document</p>	<p>3.1. Announcement was disseminated reasonably (one week) early before the event</p> <p>3.2. Information in the announcement is sufficient</p> <p>3.3. Public consultations were conducted in at least two formats (the document was sent on emails, discussions organized, posted online, CSO working groups, etc.)</p> <p>3.4. Multiple ways of feedback mechanism were ensured</p> <p>3.5. Sufficient time (minimum one week) was provided for feedback on policy document/brief</p> <p>3.6. Public consultations were conducted at least at three different stages of policy development.</p>
Criteria 4: Accountability	Criteria 5: Diversity of participants	Criteria 6: Public engagement/ interest
<p>4.1. Summary report on public consultations corresponds to the requirements of AoG</p> <p>4.2. Justified explanation of the accepted/rejected feedback provided.</p>	<p>5.1. Equal representation of different genders among participants</p> <p>5.2. Equal representation of minorities among participants</p> <p>5.3. Concrete measures were taken to ensure diversity</p>	<p>6.1. Number of CSO/individuals engaged (announcement)</p> <p>6.2. Number of unique feedback contributors</p> <p>6.3. Coordinating agencies' evaluation of CSO engagement</p> <p>6.4. Feedback was provided within the set deadline</p>

Scoring

The collected data were analyzed per criteria indicator. After considering the tradeoffs between simplicity, availability of the data, and complexity of measurement of quality of the public consultations, a score from 0 to 3 was chosen as a desirable range.

0 = public consultation does not meet the indicator.

1 = public consultation minimally meets the aspects of the indicator.

2 = public consultation meets most aspects of the indicator.

3 = public consultation fully meets the aspects of the indicator.

Three researchers independently scored each indicator per strategy according to the scoring system. After scoring each indicator, a simple average score was calculated per each criterion per strategy. Simple averaging became a minimal arbitrary choice since it was easier to understand and present. Next, to estimate the total score per strategy, the average for criterion 1, criterion 2, criterion 3, criterion 4, and criterion 5 was calculated for each strategy, while criterion 6 was a separate score. The maximum score for the strategy was 3.

Each strategy has two separate scores on the PCI index: The *first* score, which is an aggregated score of criteria 1-5, assesses the efforts of coordination bodies to conduct public consultations. This score is based on the indicators which are under the full control of coordination bodies. The *second* score, which is solely criterion 6, assesses public engagement in the consultation process which cannot be fully controlled by the coordination bodies.

The scoring of the indicators is arbitrary and normalized relative to the ideal maxima, based on the good practices of public consultation conduct discussed in the literature. It is essential to consider the context while assigning and interpreting the PCI scores, as much as the process of policy document elaboration might be influenced by the variety of factors, such as specificities of document content or availability of interested CSO representatives in the field.

RESEARCH OBJECTIVES

The main purpose of this research is to evaluate the public participation aspect of the selected policy documents from the 2020 cohort. This study focuses on the **process evaluation of public participation** in policymaking rather than the outcomes of it. The table below elaborates on the objectives and key research questions of this study:

Objectives	Key Research Questions
Objective 1: To assess compliance of the conducted public consultations with the new regulations.	<ul style="list-style-type: none"> - To what extent are the conducted public consultations compliant with the new Rules and Procedures? - How are public consultations planned and conducted? What steps are taken?
Objective 2: To analyze the quality and usefulness of public consultations.	<ul style="list-style-type: none"> - Who is involved in the consultations? Why? How are the participants selected? To what extent is representativeness ensured? - How is the GESI (gender equality and social inclusion) incorporated in the public consultation selection process? - What are the mechanisms utilized to encourage meaningful participation/contribution in the process? How is GESI considered in this process? - What is the level of satisfaction of CSO representatives and other relevant interest groups with participation in public policymaking? - What are the perspectives of coordinating state agencies on mandatory public consultations as well as on possible challenges associated with it? - How do stakeholders/CSOs assess the new Regulations on public consultations? - What works in practice with public consultations, what does not, and why?
Objective 3: To identify the existing gaps and develop recommendations for improvement.	<ul style="list-style-type: none"> - What are the main gaps in the current practice and how should they be addressed?

METHODOLOGY

The research targeted all strategies and policy documents from the 2020 cohort, given their availability. Initially, the list of policy documents approved by the GoG included 21 documents. The research team narrowed down the list of the documents to be covered in the research based on the research scope. Specifically, the research team decided to focus only on strategy documents or action plans, accordingly, two concept documents were filtered out from the targeted list. At the next stage, the research team identified the strategy documents which were not subjects of the public consultations (e.g., security-related strategies). Accordingly, four strategies were filtered out from the targeted list. At this stage, 15 strategy documents were identified to be covered within the research. Throughout the process, it has been revealed that some strategies from the list had either not been even developed yet, or their approval date as well as the dates of the public consultations had been postponed in 2021. Finally, the following eight strategy documents were covered in the frame of this research:

- Human Rights Strategy 2021-2030
- State Strategy for Tobacco Control 2020-2025 years and 2020-2022 action plan
- 2021-2030 Strategy of Migration
- 2020-2023 Strategy for Internal Financial Control System Development and 2020-2021 action plan
- State Strategy for Youth Policy Development 2020-2025
- Nationally Defined Contribution (NDC) (2021-2030) and Climate Action Plan (CAP) (2021-2023)
- Rustavi Atmospheric Air Quality Management Action Plan (2020-2022)
- 2020-2023 Strategy for Public Service Creation, Delivery, Quality Assurance, and Evaluation and 2020-2021 action plan



Research methods, research instruments, and data collection

In order to answer the key research questions, the WeResearch team utilized a qualitative methodology approach of data collection and analysis throughout the study.

Specifically, the research team employed the key informant interview (KII) method for primary data collection. KII is an individual qualitative interview with purposefully selected respondents. Overall, 35 key informant interviews (KIIs) were conducted throughout the study with the coordination agency representatives and public consultation participants who were involved and consulted on the policy documents. Specifically, eight interviews were conducted with coordination agency representatives and 27 interviews – with public consultation participants who represented CSOs or individual civic activists. The coordination agencies provided information about the public consultation participants. The research team strived to ensure the diversity of the respondents to the greatest possible extent. Specifically, during the selection of respondents, the research team considered different factors and included respondents with different attributions whenever possible. The research team selected the respondents with different gender and ethnicity, respondents with disabilities and with different working focus whenever it was possible based on the list provided by the coordination agency.

Due to the epidemiological restrictions, all correspondence was conducted in an online format. The priority was the safety of both researchers and participants. The interviews were recorded upon verbal consent from the respondents and later transcribed for detailed analysis.

Two **semi-structured interview guides** were developed for the KIIs. One guide was for public consultation participants and another guide was for the coordination body representatives. The questions included in the KII guide covered all three objectives of the study and respective research questions. The main structure of the

interview and basic questions for it were provided in the guide; however, the researchers were free to add or adapt questions to the flow of the conversation during the interview.

Initially, the study design had also incorporated an observation in addition to the KIIs, however, the research team has managed to conduct only one observation as the coordination agencies have had to amend their plans.



Data processing and analysis

The research team applied the *public consultation index (PCI)* as the primary framework for this analysis. The researchers assessed each covered strategy according to the PCI indicators and scored per criteria. The sources for the assessment included interview transcripts of coordination agency representatives, interview transcripts of public consultation participants, public consultation reports (if available), and any other relevant available documents.

Scoring process:

First stage: Data collectors scored each indicator from 0-3 directly after the interview.

Second stage: Two different researchers scored each indicator from 0-3, independently.

Third stage: The researchers (data collector, researcher 1, researcher 2) summarized the results and agreed on one final score per each indicator.

After the abovementioned three stages of evaluation, the score was calculated per criteria by averaging indicator scorings. The maximum score per each criterion was 3. The simple average per each criterion was counted based on the corresponding indicator scores. Missing data were excluded from the analyses. Finally, the scores for the criteria were simple-averaged to calculate the score per strategy. The maximum score for the strategy was 3. This process was done for each strategy covered in the research.

At the next stage, the *qualitative data analysis (QDA)* was conducted using qualitative content analysis combining directed and conventional approaches. The key codes were deductively derived from the study objectives and PCI indicators. However, when deriving sub-codes, the study took an interpretive inductive approach. Therefore, deductive application of central concepts of the study combined with inductive code generation from the data helped the researchers to avoid the shortcomings of directed content analysis and allowed new insights to emerge from the data.



Ethical approach

The ethical principles are critically important for WeResearch. The do-no-harm principle is intrinsic to all our projects and we are careful to observe the issues of data protection, confidentiality and privacy of respondents. Ethical considerations help not only to protect the safety of respondents and interviewers but also to ensure data quality. The following principles were respected during the study:

Protection of human subjects and confidentiality

This research considered the ethical guidelines during the data collection and, particularly, ensured the confidentiality of respondents throughout all stages of the fieldwork and data collection. The records related to their identities are now stored separately from the key informant interviews and transcripts.

Voluntary participation and informed consent

All respondents were informed about the purpose of this study. The respondents were only interviewed after providing voluntary and informed consent.

Limitations

The study has certain limitations, which are important to consider at the data analysis and interpretation stage.

Limitation 1: Due to the timeline of the study, it was not possible to objectively observe and assess the meaningfulness and quality of public participation in the policymaking process. Accordingly, the study design mainly relies on the subjective assessments of meaningful participation provided by the public consultation participants.

Limitation 2: The research was conducted using a retrospective approach, i.e., the respondents had to recall the information from the events held several months before the interviews. In many cases, the respondents were not able to remember some details related to the public consultations, which might have impacted the quality of the collected data.

Limitation 3: The research covered only those subjects who directly participated in the public consultations. The research hence is missing the perspective of those who did not participate in the consultations due to various reasons. Including those respondents could enrich the study with significant insights regarding the planning and announcement stages of public consultations.

Limitation 4: Due to COVID-19, the coordination agencies had to introduce certain limitations and amendments into the public consultation processes. Accordingly, the assessment results might be very specific to the period of the COVID-19 pandemic.

Limitation 5: Since 2020 was the first year when the Rules of Procedures for Development, Monitoring, and Evaluation of Policy Documents (Resolution N629 of December 20, 2019) were implemented, most of the coordination bodies did not have any accumulated experience in planning and conducting public consultations. Thus, it might be an excessively early stage to evaluate the performance of coordination bodies in regard to public consultations. Instead, this is a good time to capture the first experiences and learned lessons to be considered in the future.

FINDINGS

The main findings of this research are presented per the stage of public consultation planning and implementation. First, we will discuss the public consultation planning process, which is followed by the public consultation implementation subchapter. It includes the findings related to the announcement, effectiveness of the process, inclusion and accessibility, communication, facilitation, and accountability. The public consultation implementation subchapter is followed by the PCI scores on criteria 1-5. The final subchapter discusses public engagement and interest followed by PCI score on the sixth criterion.

Public Consultation Planning

The planning process for the public consultations involved multiple challenges, from the lack of awareness of the new regulations to the need to adjust the format and mobilize additional resources due to the challenges associated with COVID-19.

The coordinating agencies had varying knowledge of the Rules of Procedures for Development, Monitoring, and Evaluation of Policy Documents (Resolution N629 of December 20, 2019). Most respondents were unaware of the existence or contents of the Handbook that the Administration of the Government of Georgia made available in 2019. However, there were exceptions. Some coordinating agencies were more knowledgeable about the Handbook and even received a comprehensive training module to adopt the new practices. Certain coordinating agencies thought that the new requirements were hard to implement. They encountered challenges while developing indicators for the strategy and action plan:

Too much information is needed that is either not being measured or cannot be counted. I had to remove the activity altogether or adjust it to somehow measure it. In our case, many activities could not be measured but they still occurred, so we still had to reflect and evaluate them, which was challenging.
(coordinating agency representative)

Coordinating agencies planning public consultations amid the COVID-19 restrictions did not require any immediate financial resources. Across the board, the agencies mentioned the ease of use and affordability of online meeting tools such as Zoom. In some cases, donor organizations (e.g., the UNDP) actively funded and supported public consultations.

The consultation [in a pandemic] cost virtually nothing, as it was based on remote, online, platforms that were free or owned by the coordinating agency. (coordinating agency representative)

Public consultations were conducted with the joint funding from the donors and the Youth Agency. Without the donor assistance, it would have been hard to mobilize human resources, so their role was pivotal.
(coordinating agency representative)

On the other hand, the coordinating agencies complained about the lack of human resources dedicated to organizing public consultations. Most of the time, public servants had limited capacity and needed to find extra time to arrange public consultations. Moreover, CSOs believe that the coordinating agencies would receive multiple comments from different sources, which would require additional professional qualifications and capacity, namely data analysis skills, to run the process smoothly:

It takes a lot of human resources to meet the standards outlined by the Handbook, and we have only two people in our department. (coordinating agency representative)

Many recommendations need to be considered, many people need to be heard and this is challenging. People (at the coordinating agencies) should possess solid analytical skills to be able to synthesize 100 stories and produce results. (CSO representative)

Another important factor in the planning process was the lack of political will. Organizing a public consultation depends on whether the government institutions have the desire or mandate to carry out a specific reform or have a more open engagement. When the specific agencies had requirements from international donors, some CSOs did not feel their sincere eagerness to change the existing circumstances. However, multiple CSO representatives emphasized the importance of political will in planning effective public consultation. The process felt more transactional for the participants as well as there was a lack of transparency and trust in some cases. In one instance, a research participant indicated possible connections between private businesses and the government. The private businesses received certain benefits from the government in return for their donations to the public funds. These informal agreements inevitably affected the speed of the strategy approval. Furthermore, some CSOs disapproved of the centralized decision-making affecting the public consultations. This factor was said to affect the inclusivity of participants from municipalities and rural areas:

The decision-making in our country is very centralized. Regional authorities and organizations need to be mobilized to increase their engagement. (CSO representative)

The effective implementation of public consultation is largely defined by the political will of the decision-makers to encourage public engagement as well as by the allocated resources. The research showed that when the state agency authorities acknowledged the importance of public participation, the resources were also allocated more adequately. In many cases, the coordination bodies experienced a lack of human resources, which was directly linked to the logistical and analytical capacities to plan and carry out public consultations effectively.

Public Consultation Implementation

Announcement

As mentioned earlier, most coordinating agencies had little knowledge of the new requirements regarding the Rules of Procedures for Development, Monitoring, and Evaluation of Policy Documents. Consequently, they lacked the understanding of what public consultation announcements entailed. Some government representatives considered engaging donors, experts, or their counterparts as public consultation. They claimed that the announcement was published on their official website, which in a way was public consultation. Others deemed informing only relevant/knowledgeable stakeholders as public consultation. Some coordinating agency representatives thought it was unnecessary to involve too many people in the strategy development, and only a small group of knowledgeable stakeholders would be sufficient. Therefore, some of them believed that any random participant would not be able to positively contribute to the process:

Subject-matter qualifications and experience of the participating/selected organizations made it easier to discuss, consider, and reflect recommendations in the strategy and action plan. (coordinating agency representative)

Consequently, some coordinating agencies informed and engaged only the stakeholders with whom they already had some type of affiliation. They stated that they had a list of contacts and they knew whom to approach for

specific types of feedback. Similarly, some CSOs also underscored the role of personal connections in their engagement, claiming that their close relationships with the coordinating agencies made it possible for them to be involved in the process. Several research participants noted that the same group of stakeholders was attending the public consultations, so everyone knew each other.

The announcements were mostly shared through the government agency websites, Facebook pages, and emails (in the case of closed engagement). Whenever the announcement was published on the website, anyone who wished to participate could access the invitation link. Most agencies have never had any criteria for selecting participants for public consultations, and they were open to anyone interested. However, some coordination agencies did not put any additional effort to make the announcement spread further and reach a wider public. They believed that posting on a webpage would be a sufficient measure to ensure the publicity of the announcement.

In other cases, coordination agencies simultaneously used multiple platforms to announce the public consultations. For example, they posted the announcements not only on their webpages but also on social networks such as Facebook. This approach was assessed as more effective in terms of reaching the wider public. Furthermore, some coordination bodies used the partner CSO resources to spread the word on public consultation announcements within their respective networks. This, in return, increased the engagement. The CSOs suggested tailoring the announcements to the target audience (e.g., Facebook posts were effective with persons with disabilities).

In some cases, participants were the ones who initiated their engagement. One participant, representing a local CSO, submitted a formal request for information to the coordinating agency. Later, she received an email invitation to the public consultation with the corresponding policy documents for feedback.

All announcements were disseminated reasonably (at least one week) early before the event. Most coordinating agencies did not store any public consultation announcement documents; hence, the research participants were asked to provide comments on the content of the announcements. Retrospectively, the participants had a poor recollection of details included in the announcements; however, no one complained about the inadequacy of the information. The announcements were mostly disseminated in Georgian and in some cases in English as well, neglecting accessibility challenges for diverse groups. **The language was the least considered factor in ensuring more inclusive public consultation announcements.** The coordinating agencies put little to no effort in translating the announcements into languages spoken by the minorities (e.g., Armenian or Azerbaijani):

We translated documents only into English; however, any further translations and extensive editing of the documents would delay the strategy development process. (coordinating agency representative)

Public consultation process

The coordination agencies applied different approaches for the public consultation processes. Some agencies managed to engage civil society at multiple stages of the strategy or action plan elaboration, while most of the agencies conducted public consultations only at the last stage. CSOs believe that their continuing engagement at all levels – starting from designing goals and objectives of the strategy to selecting indicators and finalizing strategy document – is essential and ensures active engagement, thus higher quality of the document. Public consultations that are conducted only at the final stages of the document elaboration result in poorer participation and minimal feedback from CSOs, as much as they lack the information about the previous processes of document elaboration and the content of the document itself. Furthermore, as the research participants shared, in most cases brief versions of the strategy were not disseminated before the public consultation meetings, which might have been useful for the participants to gain a certain level of understanding of the document content before the discussion:

In my opinion, it is essential to start preparing the audience for such public consultations and provide information about the consultation purpose and process in advance, so that the participants do not see the document for the first time in the workshop. It is very important that participants are prepared in advance and this might increase their motivation, too: for example, they will review some materials in advance and will have a better idea of what they want to share during the public consultations. (coordination agency representative)

The engagement should start from the very beginning of the process and this will make public even more interested. When they show you an already developed document, everybody knows that receiving and addressing feedback on this document will be more or less formal. When the state agencies prepare a document and this document is accepted and approved internally, after that they usually resist external feedback from NGOs. Accordingly, it is crucial that the third parties are included from the very beginning [of the document elaboration process]. (CSO representative)

When you are involved in the continuing process [of strategy elaboration], you share your opinion more freely, because you already have worked on the document and can apply and compare the results from the previous meetings. (CSO representative)

Another important factor for adequate participation is the format of public consultations. Coordination agencies used different formats – online meetings, in-person meetings, publishing on a webpage, or email communication. Due to the COVID-19 related restrictions, the coordination agencies had to adapt their public consultation format accordingly. Since March 2020, online meetings, publishing on a webpage, or e-mail communication formats have replaced almost all in-person meetings.

Both coordination agencies and CSO representatives preferred meetings (either in-person or online) over the email communication format, as much as the meeting format enabled live discussions; while posting on a webpage or email communication might lead to uncertainties regarding a document itself, content, or feedback process, which might result in lower engagement from the public. Furthermore, the email or webpage posting format requires additional effort from the coordination agencies' representatives to be responsive to all questions and requests from the interested parties. In this regard, some agencies used additional channels to facilitate communication with engaged parties: for example, some of them created WhatsApp groups or email lists to ensure convenient and smooth communication with the participants throughout the process.

Furthermore, as the representatives of the coordination agencies mentioned, they had to adapt the format based on the stage of document elaboration. If the public consultations were conducted at multiple stages of the strategy elaboration, usually the coordination agencies applied several formats. For example, according to the research participants, in-person or online meeting format was more convenient when the strategy priorities and aims were being defined. On the other hand, at the stage of indicator selection, the email format was identified as the most effective, as much as this process required more detailed and scrupulous work:

We had four priorities and 26 goals – in such case, it is possible to [organize discussions] but when it comes to the 300 objectives and respective indicators, [the discussion format] is not possible. Accordingly, the online format was much more logical, and no one complained about it. (coordination agency representative)

The research respondents discussed the advantages and disadvantages of online meetings, which, as mentioned above, turned out to be one of the most frequently applied solutions during the COVID-19 related restrictions. The respondents recognized that although the in-person meetings made the discussions more dynamic, the

online meetings encouraged participation regardless of the location of the interested parties, thus promoted diversity and inclusion at a certain level. Multiple CSOs and participants mentioned the benefits of holding public consultations online. Some CSOs positively assessed the format and noted how Zoom meetings promoted inclusivity and better access to public consultations.

The Zoom meetings worked well since persons with disabilities from rural areas were involved. These participants engaged in the consultations without the need to travel or face any other barriers in this regard. (CSO representative)

On the other hand, engagement in the online meetings required access to the respective devices and internet, as well as an adequate level of digital skills. CSO representatives also mentioned how the online format of public consultations limited the participation of senior residents, especially in rural areas. In some cases, the online format introduced barriers for persons with disabilities, too. According to a public consultation participant who is hearing-impaired, the process excluded her and her peers and changed their plans:

Online format is not for everyone. I am fairly close with persons with disabilities, including hearing-impaired youth, who could not attend the event. Our activities have changed in return. (CSO representative)

Senior residents in municipalities are actively engaged in public consultations. Vulnerable groups and parents of persons with disabilities are also very active. Unfortunately, these communities are usually left behind since they lack access to the internet and computers. (CSO representative)

Overall, the research respondents assessed the online meetings positively and suggested adopting a hybrid format even after the pandemic-related restrictions are lifted. According to these respondents, the hybrid format offers more accessibility, especially for participants who cannot travel to attend the event.

In my opinion, it would be good if coordination agencies ensured that both options were available, i.e., online meetings for those who are not able to join physically as well as in-person meeting options should be available. So that people can either attend an in-person meeting or join online. (CSO representative)

Accessibility, diversity, and inclusion are important indicators for effective public consultations, as mentioned in the literature. For the meaningful participation and effective outcomes of the public consultations, coordination agencies must ensure that the process is accessible for anyone and thus promotes the inclusion of diverse groups throughout the public consultation process. The research findings indicate that most coordination agencies took no specific measures to ensure diversity and inclusion of the participants. Equal representation of women and men was achieved accidentally, without any direct efforts. Other minority groups – such as people with disabilities, ethnic and/or religious minorities, LGBTQI+ community – either missed out from the participation or the data was not available to verify their participation level during the research. The only exceptions in terms of minority inclusion were *Human Rights 2021–2030-year Strategy* and *State Strategy of Youth Policy Development 2020–2025 years*. Specifically, developing *Human Rights 2021–2030-year Strategy* required collaboration with different organizations that worked on minority issues as this strategy included the objectives that directly referred to the minority groups. Furthermore, the Youth Agency took specific measures to ensure the participation accessibility for persons with disabilities through identifying special needs for each registered individual and addressing those needs during the meetings. For the other strategies, the coordination agency representatives do not consider minority inclusion an essential part of the public consultations, as much as they do not see the diversity component as integral for the strategy document they work on. Furthermore, some respondents believe that it is more important to have the relevant group of participants, rather than all minority representatives, which might not be a direct beneficiary of the strategy.

Ethnic minority is not a group which is directly linked to the migration issues. [...] In this case, it would be more interesting to involve those groups who are under the direct effect of this strategy more widely. For example, returned migrants might be such a group, foreigners living in Georgia might also be such a group. These groups definitely could be included in the process more intensively. (CSO representative)

CSO representatives believe that the principle “Nothing without Us” should be applied throughout public consultations as well to ensure that their voices are reflected in the policy, which will have a direct effect on their lives afterward. Accordingly, it is crucial for the coordination agencies to take special measures to increase accessibility to these processes for different groups and promote their participation.

Those people who attended the meeting and we, represent the community, which faces various needs and problems. Accordingly, whenever something is being planned and decisions are made either at the policy level or activity level, the principle – nothing without us – [should be applied]. The government representatives, as well as international organizations and donors, should have a strong understanding of this. (CSO representative)

Increasing accessibility to the public consultation processes might be achieved through different ways, such as relying on local government resources to involve hard-to-reach groups. For example, the Youth Agency used the local governments' resources to ensure the inclusion of the participants from remote communities while conducting public consultation meetings in the regions. Both coordination agencies' and CSO representatives provided positive feedback on this practice.

We had a challenge of including youth from the regions and remote villages who needed transport to attend the forum. In such cases, with the support of the local governments, we encouraged the youth to apply for the transportation arrangements. For example, Oni municipality allocated the transport and organized trip to the forum location. (coordination agency representative)

Another important strategy to ensure the inclusion of ethnic minority groups is to increase the language accessibility of public consultation processes. The research showed that none of the strategies have been translated into a single ethnic minority language, nor the communication or discussion process was supported by the respective translation. It is essential for ethnic minority representatives to know that their needs are considered during public consultation processes as this could increase their engagement level. Language accessibility was not considered in the other aspects as well: for example, the strategy document language was likely too technical and difficult for people who were not used to work with the formal language. Accordingly, it is important to have an adapted jargon-free version of the document. Such an approach would further increase the interest and engagement of the wider public.

Flexible communication and facilitation are additional fundamental factors that define the effectiveness of the public consultation process. Overall, the CSO representatives assessed the communication with coordination agencies very positively. The coordination agency representatives were open, responsive, and collaborative during the public consultations as described by the research participants from CSOs. As mentioned above, the coordination agency representatives used multiple communication channels (WhatsApp, email lists, etc.) to facilitate the consultation process within the online format. Furthermore, some coordination agency representatives identified good practices of individual communication with the participants. Specifically, one coordination agency representative communicated individually with each participant to emphasize their need for expert input on the specific areas of the document. Such a strategy motivated the engaged parties to provide feedback on the document and facilitated better participation.

We managed to convince all involved parties that their participation was critical. After that, the coordination was really easy, because these people and organizations felt that their input was needed and this [need] was not artificial. This was our attempt to build trust [towards the process]. (coordination agency representative)

Research participants identified the importance of the effective facilitation of the discussion within the online or in-person meeting format. Specifically, some coordination agency representatives mentioned that the low engagement level during the discussion was a big challenge for them. Usually, when the meeting format was applied for the public consultation, the meetings started with a presentation of the document itself, followed by the discussions. In a number of successful cases identified during the research, the coordination agencies also applied workshop components. Thus, after the general presentations, the participants were divided into thematic working groups based on their expertise or interest, where they practically worked on specific parts of the document. Both coordination agency and CSO representatives assessed this approach as effective since it ensured adequate and sufficient feedback from the participants and increased the overall productivity of the public consultation process.

Accountability: feedback and reporting of public consultation results

Accountability is another aspect important for successful public consultation, which implies mutual collaboration and feedback between the coordinating agencies and CSOs. According to the new Rules and Procedures, coordination agencies are responsible to provide detailed information regarding the public consultation results. Specifically, they have to inform participants of which comments were incorporated, and which ones were rejected with justified explanations. At the final stage, coordination agencies are responsible to develop a summary report on public consultations according to the minimum requirements defined in the Handbook.

Six out of eight coordination agencies that participated in the research shared either drafts or final versions of summary reports with the research team to include in the analysis. The reports for the remaining two strategies were not developed by the time of this research. This study showed that the general lack of knowledge on the Rules of Procedures for Development, Monitoring, and Evaluation of Policy Documents affected the delivery and quality of the summary report on public consultations. The coordinating agencies had a varying understanding of the reporting requirements and of what the summary report entailed. Published meeting minutes that included the names and contact information of the government counterparts, international organizations, or individuals were considered to be the summary reports. In other cases, immediate integration of the feedback into the strategy document/action plan, along with the meeting minutes, were deemed to be the reports on public consultations. There was also a perception that report quality was linked to the richness of the comments collected during the consultation process. This confusion corresponds to the general lack of clarity on the standards for the summary reports:

We have not received comments where I would say, for example, that Mr. X provided feedback that we think we should take into account to adjust our ideas, i.e., we have not received comments of such significance. (coordinating agency representative)

On the other hand, there were a few coordinating agencies that successfully adopted the requirements for the summary reports. Namely, the summary report on the public consultation for the Migration Strategy was of high quality. This report included background information, criteria for defining the status of the comments, and the graph with the feedback summary. Generally, the coordinating agencies used the reports and tables to summarize the accepted/rejected feedback. In some cases, the CSOs mentioned receiving feedback through phone calls and emails as well:

We created a comprehensive list of comments that were either reflected, not reflected or partially reflected, and we included the corresponding explanations for the participating organizations. (coordinating agency representative)

Overall, most CSO representatives participating in the research mentioned that they received a justified explanation of the accepted or rejected feedback in some format and on time after they submitted their feedback on the strategy document. Most of them assessed the received explanations as satisfactory. Nevertheless, some CSOs noted that the feedback from the coordinating agencies was too formal and generic and did not contain a justified explanation on the rejected comments:

It seemed that the response was very general. [...] It was hard to logically connect our comments to their responses. Their [coordinating agencies'] feedback was vague. (CSO representative)

The participants and CSOs generally felt their engagement and contribution to the public consultations were imperative and meaningful. They noted that the participants created value which the coordinating agencies should consider, regardless of the quality or size of their feedback. The participants and CSOs believed that their experience and competence ensured the quality and diversity of perspectives in the strategy document. The participants and CSOs generally believe that public consultations will ensure fixed priorities at the policy or strategy level, regardless of the authority changes in the coordinating agencies. In addition, some CSOs evaluated the process as very educative and informative for them. As a result of their participation in the public consultations, they gained a better understanding of how the state agencies worked, what were their priorities, etc:

It [participation] was useful since it was a testament to implementing the "Participatory approach" in practice. There was a clear communication, and one could feel the openness towards unconventional ideas. (CSO representative)

Our [CSO] participation is crucial for the strategy development [...], we had an opportunity to define priorities and it was very important because tomorrow the authorities might change, but the document will remain the same and everyone will conduct these priorities. (CSO representative)

For me, the participation was very important, because I learned a lot of new things [...] If a similar event is planned in the future, I will not miss out on attending it by no means. I think that every citizen has to contribute to the policy development at some point. (CSO representative)

By the end of the interviews, the CSO representatives participating in the research were asked to evaluate their satisfaction with participation in the public consultation processes on a 10-point scale, where 10 points meant the highest satisfaction. Out of 27 CSO representatives participating in the research, 22 provided their assessments, while five refrained. **The average satisfaction score based on the feedback from 22 CSO representatives was 6.7 out of 10.**

The research showed that the coordination agencies applied a variety of approaches to implement public consultations. Some agencies made specific efforts to ensure wider publicity of the announcements of the public consultations, while others spread information among the limited groups of people. Conducting public consultations at multiple stages, from the beginning of the policy document elaboration, made participation more sophisticated. Due to COVID-19, the coordination agencies had to switch their public consultations to the online format. The experience showed that an online format could either promote or hinder the accessibility to participation. In most cases, the accessibility and inclusion were almost missing; while in some cases, due to the total number of participants, the representation of different genders and minorities was achieved. However, concrete measures ensuring diversity could be improved. Utilizing multiple channels and forms to provide

feedback and communicate with the participants ensured flexibility of the public consultations process. Despite almost all participants received information on whether their input was accepted or rejected, the capacity of the coordination body representatives could be improved in terms of accountability and developing summary reports of public consultations.

On the PCI index, the total average score of criteria 1-5 across all eight strategies is 1.8 (out of 3), with the highest overall score on the criteria 3: effectiveness of the process – 2.6 (out of 3), and the lowest overall score on the criteria 1: accessibility – 1 (out of 3). The detailed scoring per strategy is provided in the annex.

Criteria 1: Accessibility	1
1.1. Announcement disseminated was accessible for diverse groups (language accessibility, clarity, etc.)	0.8
1.2. Announcement and/or policy brief were disseminated through multiple channels	1.5
1.3. Policy document/brief was accessible for diverse groups (language accessibility, clarity, etc.)	1.1
1.4. Process was adapted to the needs of diverse groups (pwd, ethnic minority, etc.)	0.6
Criteria 2: Openness	1.8
2.1. Announcement on public consultations was openly available	1.5
2.2. Policy document/brief was publicly available	1.3
2.3. Opportunity to participate in public consultation was open to anyone interested	1.6
2.4. Everyone involved/registered had an opportunity to provide feedback on a policy document	2.8
Criteria 3: Effectiveness of the process	2.6
3.1. Announcement was disseminated reasonably (one week) early before the event	3
3.2. Information in the announcement is sufficient	2.9
3.3. Public consultations were conducted in at least two formats (the document was sent on emails, discussions organized, posted online, CSO working groups, etc.)	2.3
3.4. Multiple feedback mechanisms were ensured	2.5
3.5. Sufficient time (minimum one week) was provided for feedback on policy document/brief	3
3.6. Public consultations were conducted at least at three different stages of policy development.	2.3
Criteria 4: Accountability	2.2
4.1. Summary report on public consultations corresponds to the requirements of AoG	2.2
4.2. Justified explanation of the accepted/rejected feedback provided.	2.3
Criteria 5: Diversity of Participants	1.3
5.1. Equal representation of different genders among participants	2.4
5.2. Equal representation of minorities among participants	1
5.3. Concrete measures were taken to ensure diversity	0.5

Public engagement and interest in public consultations

The coordination agencies experienced a different level of engagement and interest from CSO during the public consultations. Some agencies' representatives mentioned that the participation was very high and valuable, while several coordinating agencies complained about the lack of engagement from the participants and CSOs, including the minority groups. The context and the topic of the strategy determined the size of the engaged audience. For instance, the State Strategy of Youth Policy Development 2025 involved up to 550 participants (seven regional forums), while the Migration Strategy had less than 5 stakeholders on the list.

The agencies expected more participation considering there was a high public interest in the issues included in the strategy. The pandemic-related restrictions caused disruptions in the engagement. Some CSOs mentioned that they had to shift their limited resources to the community's needs and could not fully participate in the public consultations. Others noted how switching to an online format led to less productive discussions since participants were less willing to express their ideas in an online space.

I am convinced that any face-to-face meeting is much more productive, it gives you more courage to express. [...] It would have been much better to hold physical meetings not only with the ministry but also with each other, CSOs, or experts. It would have been more effective and precise requirements would have been set. (CSO representative)

Another important factor that might have a significant influence on the level of engagement is the composition of groups at public consultations. The data showed that the consultations largely involved government counterparts and international organization representatives, together with the CSO and grassroots level representatives. In such case, power relations might affect an equal engagement of all participants. Contrary, when the group was solely composed of CSOs/grassroots level representatives, the engagement was of much higher quality.

Although the CSO participation and input were assessed as very valuable for developing quality documents, the coordination agencies discussed some challenges that they faced while receiving input from the CSOs. For example, some coordination agency representatives mentioned that the participants were overly demanding with unrealistic expectations regarding the public consultations.

We received so many recommendations and so many opinions, it definitely confirms that [participation] is important and needs to be taken into consideration. However, for the next consultations, it would be desirable for the participants to be realistic when they discuss some document, that they focus on specific objectives of the document and do not jump into general matters. (coordination agency representative)

Furthermore, in some cases, the comments were irrelevant and mostly concerned with the wording or language unclarity of the policy documents. Such comments failed to add value to the overall strategy approval process. The government representatives explained this issue with the lack of subject-matter expertise related to the strategy content. The participants with little or no expertise were left confused, resulting in miscommunication during the discussions. In some cases, the comments were completely out of context, so the coordinating agencies had to spend more energy and time to resolve them. Usually, the strategy documents had a specific technical information flow and included indicators that some participants might have not comprehend:

Most people have no relevant experience or knowledge necessary to grasp the main components [of the strategy document] and the progress indicators. This [lack of experience] usually leads to loss of time and a negative consultation experience. (coordinating agency representative)

Furthermore, some coordinating agencies mentioned the challenges associated with incorporating, connecting,

and summarizing the comments received from the individuals, CSOs, experts, and international organizations. Despite its insightfulness, the feedback was hard to reconcile without losing relevance or mutually excluding views. Both coordinating agencies and CSOs claimed there was a shortage of knowledgeable participants willing to engage in the discussions. None of them mentioned making any additional efforts to mobilize stakeholders outside of the already known groups. The research participants claimed they knew everyone interested in the topic and related consultations, and that these stakeholders were already engaged in the working groups:

Not all organizations work on all topics. The level of activity depends more on what topic is being discussed and what topic is of interest to me. [...] Generally, this field [migration] is very specific with very few organizations working on the related issues. (CSO representative)

On the PCI index, the total average score for criteria 6: Public engagement/interest (coordination agency perspective) across all eight strategies was 2 (out of 3). The detailed scoring per strategy is provided in the annex.

criteria 6: Public engagement/interest (coordination agency perspective)	2
6.1. Number of CSO/individuals engaged (announcement)	1.9
6.2. Number of unique feedback contributors	1.8
6.3. Coordinating agencies' evaluation of CSO engagement	2.1
6.4. Feedback was provided within the set deadline	2.4

CONCLUSIONS AND RECOMMENDATIONS

The engagement of the wider public in the policymaking process has become a generally accepted approach to achieve good governance. Active engagement of all relevant stakeholders improves the quality of elaborated policy documents by providing additional expertise and data, increases trust and ownership towards the policymaking process, raises the legitimacy of the adopted decisions, and supports effective policy implementation. Citizen engagement in the public policymaking process has been declared a priority by the Government of Georgia as evidenced by a number of strategic documents. These include the EU-Georgia Association Agenda 2017-2020, the Sustainable Development Goal 16 (nationalized), the Public Administration Reform Roadmap 2020 and its 2019-2020 Action Plan, the Open Government Partnership Action Plans, etc. Nevertheless, until recently, there was no systematic approach towards ensuring effective public participation in the policymaking process, while the existing regulations were general and non-mandatory. At the end of 2019, the Rules of Procedures for Development, Monitoring and Evaluation of Policy Documents were adopted, making it mandatory to conduct public consultations on any policy document before its approval. This regulation sets the specific guidelines and minimum requirements for public consultations. The regulation applies to the entire 2020 cohort of the strategic policy documents. The study attempted to assess the process of public consultation, its compliance with the new rules and regulations, take a closer look at the quality and meaningfulness of the consultation, as well as develop recommendations for the identified gaps and shortcomings. With this purpose, the research team developed the public consultation index (PCI) which assessed the public consultation process on six criteria and analyzed the collected data through the PCI lens.

The research showed that overall, the conducted public consultations met the minimum requirements set in the new Rules and Regulations. However, the coordination body representatives needed to improve their understanding and knowledge regarding the specific requirements of public consultations identified in the Rules and Regulations. The study revealed that on the one hand, the state agencies lacked the understanding and capacity to ensure meaningful public engagement in the policy development process. On the other hand, civil society needs to learn and improve its participation practices and develop a culture of citizen participation.

To improve the public consultations, the research team developed recommendations for the Administration of the Government of Georgia and coordination agencies.

Recommendations for the Administration of the Government of Georgia

Enforce standards of implementation related to public consultations: The study revealed that almost all coordinating agencies were unsure or unaware about at least one aspect of the public consultations (e.g., announcement, consultation process, summary report). The Handbook contents were unknown or partially unknown to most research participants representing the coordinating agencies. The mission of the AoG should be to actively promote the adoption of new practices outlined in the Handbook. The enforcement of implementation should be done through awareness campaigns, events, active dissemination of materials, and training modules for the coordinating agencies.

Share local best practices implemented by the coordinating agencies: Some coordinating agencies managed to successfully adopt the new public consultation requirements outlined in the Handbook. They managed to meet all or most of the new requirements. The AoG could highlight such best practices and allow the coordinating agencies to share their success stories with others through reflection workshops, meetings, or online platforms.

Recommendations for the Coordinating Agencies

Set up sector-based/thematic working groups to develop strategies: For strategies involving hundreds of stakeholders (e.g., the State Strategy of Youth Policy Development), establishing thematic working groups proved to be effective. This approach ensured more consolidated efforts from the participants' side and more quality insights for the coordinating agencies. An experienced stakeholder who would ensure the relevance of recommendations on a smaller scale needs to facilitate the working groups. Such facilitators would balance the participants' various backgrounds and enhance the overall quality of the ideas. Individual working groups would later summarize their ideas and report back to the coordinating agencies. Multiple CSOs and participants also emphasized the effectiveness of working in individual thematic groups.

Diversify and improve communication mechanisms:

- a) Introduce mailing lists and newsletters to disseminate information on the upcoming public consultations and their results. The messages would include a description of planned activities, information on legislative changes, important dates, timelines, reminders, and other relevant information.
- b) Follow-up with CSOs individually: In order to decrease the level of formality, engage with CSOs and participants on an individual level. Some coordinating agencies have already done it but this should be scaled as a common practice. Communication with the participants should include deadline reminders and the details on the type of feedback that is expected from them. This approach would increase trust between the authorities and participants.
- c) Tailor announcements to the needs of the target audience: Coordinating agencies should leverage social media/Facebook and other tools to increase participation.
- d) Promote open and transparent processes: Open communication and engagement would lead to trust, which, in return, would produce high-quality results and increase the sense of ownership in the participants.

Engagement should commence on the strategy development stage: Almost all CSOs and participants mentioned how their engagement in the initial stages ensured more productive collaboration with the coordinating agencies. The participants felt that the process was authentic and their contribution was valuable. The coordinating agencies should involve the stakeholders from the strategy concept phase instead of only the final stage of the strategy development.

Maintain a hybrid version of consultations even after the pandemic-related restrictions are lifted:

According to the multiple research participants, the availability of participation formats will ensure a more inclusive public consultation process. Persons with disabilities would be likely to opt for online space since it is more convenient and accessible for them. Furthermore, most participants have work or study commitments during the day which makes it harder for them to commute to the meetings. Participants can subsequently be grouped based on their format preferences.

Hold public consultations on a municipal level: Decentralize decision-making by organizing on-site public consultations in the municipalities. This approach would allow a more accessible environment for the rural population that wishes to physically attend the discussions.

Improve process facilitation by including more interactive formats: Despite their convenience, online public consultations introduce participation challenges. Many times, the attendees are not willing to speak up and express themselves freely. The coordinating agencies can mitigate the lack of participation by applying various tools to boost interaction. These could be small brainstorming sessions and ice-breaking activities.

Raise awareness of CSOs to promote more engagement: In some cases, participants did not know about the existing issues, related strategies, or public consultations. It is imperative to mobilize more stakeholders by taking concrete measures to spread awareness and ease the engagement.

Coordinating agencies should consider providing materials and information in minorities' languages: All minority language-speaking stakeholders were excluded from the public consultation processes since the announcement, strategy documents, and consultation meetings were not interpreted in languages other than Georgian and English (in some cases). The coordinating agencies need to consider this factor while organizing inclusive and fair public consultations.

Promote diversity through dedicated efforts to engage more participants: The study revealed that the coordinating agencies needed to take concrete actions to ensure the inclusion of minority groups (persons with disabilities, LGBTQI+, etc.). Subsequently, coordinating agencies need to be ready to accommodate these audiences. Moreover, specific strategies would benefit from contributions from the business sector: for instance, legislative changes involving tighter regulations for enterprises.

The coordinating agencies need to gather data on the diversity of participants: As of now, the coordinating agencies have little to no information on the diversity of the stakeholders engaged. Diversity data should be used to a) provide a statistical overview for the summary reports on the public consultations b) reach out to minority groups for future events.

Provide a policy brief/outline document as a faster feedback tool: Most policy documents are long, requiring significant time for the participants to provide feedback. Coordinating agencies need to develop a shorter version (e.g., a two-pager) of the strategy document/action plan and gather responses from the participants. The policy brief will describe the upcoming legislative changes and the stakeholders' role in the strategy development and approval process.

ANNEX: PUBLIC CONSULTATION INDEX (PCI) ASSESSMENT PER STRATEGY

The Human Rights Strategy 2021-2030

The Human Rights Strategy 2021-2030 achieved one of the highest scores on the PCI (total score - 2.4), meaning that the public consultation met most criteria of the good international practices and the relevant local standards. The strategy fully meets the PCI requirements on the criteria measuring the effectiveness of the process: the announcement was disseminated reasonably early before the event, the information in the announcement is sufficient, public consultations were conducted in at least two formats, multiple feedback mechanisms were ensured, sufficient time was provided for feedback on a policy document/brief, and Public consultations were conducted at least at three different stages of the policy development. The strategy scored the least on the criteria measuring accessibility; while the announcement was disseminated through multiple channels (including Facebook and emails) and was accessible for diverse groups, the policy document itself was not publicly available. In addition, the process was not adapted to the special needs of minority groups, and both the announcement and policy document were available only in the Georgian language. The strategy also meets most PCI indicators' requirements regarding openness, accountability, and diversity of the participants.

From the coordination agencies' perspective, public engagement and interest were also high (3/3). Around 80 CSOs were officially invited and more than 20 were actively involved in the process. Most of the engaged CSOs provided meaningful feedback within the set deadlines. Overall, even though more effort is needed to ensure the inclusion of minority groups, the Human Rights Strategy 2021-2030 is one of the successful examples of an effective and meaningful public consultation process.

Indicator/Criterion	Score
Overall score for criteria 1: Accessibility	1.8
1.1. Announcement disseminated was accessible for diverse groups (language accessibility, clarity, etc.)	2
1.2. Announcement and/or policy brief were disseminated through multiple channels	3
1.3. Policy document/brief was accessible for diverse groups (language accessibility, clarity, etc.)	1
1.4. Process was adapted to the needs of diverse groups (pwd, ethnic minority, etc.)	1
Overall score for criteria 2: Openness	2.5
2.1. Announcement on public consultations was openly available	3
2.2. Policy document/brief was publicly available	1
2.3. Opportunity to participate in public consultation was open to anyone interested	3
2.4. Everyone involved/registered had an opportunity to provide feedback on a policy document	3
Overall score for criteria 3: Effectiveness of the process	3.0
3.1. Announcement was disseminated reasonably (one week) early before the event	3
3.2. Information in the announcement is sufficient	3
3.3. Public consultations were conducted in at least two formats (the document was sent on emails, discussions organized, posted online, CSO working groups, etc.)	3
3.4. Multiple feedback mechanisms were ensured	3
3.5. Sufficient time (minimum one weeks) was provided for feedback on policy document/brief	3

3.6. Public consultations were conducted at least at three different stages of policy development.	3
Overall score for criteria 4: Accountability	2.0
4.1. Summary report on public consultations corresponds to the requirements of AoG	N/A
4.2. Justified explanation of the accepted/rejected feedback provided.	2
Overall score for criteria 5: Diversity of participants	2.7
5.1. Equal representation of different genders among participants	3
5.2. Equal representation of minorities among participants	3
5.3. Concrete measures were taken to ensure diversity	2
Total score	2.4
Overall score for criteria 6: Public engagement/interest (coordination agency perspective)	3.0
6.1. Number of CSO/individuals engaged (announcement)	3
6.2. Number of unique feedback contributors	3
6.3. Coordinating agencies' evaluation of CSO engagement	3
6.4. Feedback was provided within the set deadline	3

2020-2023 Strategy for Internal Financial Control System Development and 2020-2021 action plan

The public consultations on the 2020-2023 Strategy for Internal Financial Control System Development and 2020-2021 action plan minimally met the PCI standards (total score - 1/3). The highest score was achieved on the indicators measuring the effectiveness of the process (2.2/3). On all other criteria, public consultation only meets the minimal standards. While it needs to be underlined that the public engagement and interest were relatively low (1/3), this criterion is counted separately and does not contribute towards the averaged PCI score. Despite the relatively low score, the coordination agency's effort should be particularly noted – with the limited capacity and lack of public interest, it was able to conduct the public consultations on a subject matter which required special knowledge and expertise. On policy documents like 'Internal Financial Control System Development,' it may be challenging to adopt a highly technical language to an accessible style and easily understandable terms. Thus, it is particularly important for such documents that special efforts are made to ensure the style accessibility. The style accessibility will also increase public engagement and the overall quality of public consultations.

Indicator/Criterion	Score
Overall score for criteria 1: Accessibility	0.3
1.1. Announcement disseminated was accessible for diverse groups (language accessibility, clarity, etc.)	0
1.2. Announcement and/or policy brief were disseminated through multiple channels	0
1.3. Policy document/brief was accessible for diverse groups (language accessibility, clarity, etc.)	1
1.4. Process was adapted to the needs of diverse groups (pwd, ethnic minority, etc.)	0
Overall score for criteria 2: Openness	0.8
2.1. Announcement on public consultations was openly available	0
2.2. Policy document/brief was publicly available	0

2.3. Opportunity to participate in public consultation was open to anyone interested	0
2.4. Everyone involved/registered had an opportunity to provide feedback on a policy document	3
Overall score for criteria 3: Effectiveness of the process	2.2
3.1. Announcement was disseminated reasonably (one week) early before the event	3
3.2. Information in the announcement is sufficient	3
3.3. Public consultations were conducted in at least two formats (the document was sent on emails, discussions organized, posted online, CSO working groups, etc.)	1
3.4. Multiple feedback mechanisms were ensured	2
3.5. Sufficient time (minimum one weeks) was provided for feedback on policy document/brief	3
3.6. Public consultations were conducted at least at three different stages of policy development.	1
Overall score for criteria 4: Accountability	1.0
4.1. Summary report on public consultations corresponds to the requirements of AoG	1
4.2. Justified explanation of the accepted/rejected feedback provided.	1
Overall score for criteria 5: Diversity of participants	1
5.1. Equal representation of different genders among participants	3
5.2. Equal representation of minorities among participants	0
5.3. Concrete measures were taken to ensure diversity	0
Total score	1
Overall score for criteria 6: Public engagement/interest (coordination agency perspective)	1.0
6.1. Number of CSO/individuals engaged (announcement)	1
6.2. Number of unique feedback contributors	1
6.3. Coordinating agencies' evaluation of CSO engagement	1
6.4. Feedback was provided within the set deadline	N/A

State Strategy for Tobacco Control 2020-2025 years and 2020-2022 action plan

The public consultations on the State Strategy for Tobacco Control 2020-2025 years and 2020-2022 action plan also minimally met the PCI standards (total score - 0.9/3). The consultations met most aspects of the indicators on the criteria measuring the effectiveness of the process (2.5/3) and minimally satisfied the standards regarding openness (0.5/3) and accountability (1/3). Besides, it needs to be underlined that only one local CSO took part in the public consultations apart from a few international organizations. The participation in the public consultations was possible at the invitation from the coordination agency, and no open announcement was made. The limited openness of the process to the broader public undermines the representativeness of different interests regarding the strategy in question. It is crucial that more people and CSOs were consulted on the policy documents affecting human health. The lowest scores were achieved on the criteria measuring accessibility (0.3/3) and diversity (0.3/3). Non-differentiation and non-inclusion may render the consultation efforts unsuccessful and ineffective; thus, gender mainstreaming in the health sector should be a priority. The coordination agency should take more streamlined efforts to increase the number of consulted people and promote the inclusion and diversity of participants with different backgrounds, gender, and identity.

Indicator/Criterion	Score
Overall score for criteria 1: Accessibility	0.3
1.1. Announcement disseminated was accessible for diverse groups (language accessibility, clarity, etc.)	0
1.2. Announcement and/or policy brief were disseminated through multiple channels	0
1.3. Policy document/brief was accessible for diverse groups (language accessibility, clarity, etc.)	1
1.4. Process was adapted to the needs of diverse groups (pwd, ethnic minority, etc.)	0
Overall score for criteria 2: Openness	0.5
2.1. Announcement on public consultations was openly available	0
2.2. Policy document/brief was publicly available	0
2.3. Opportunity to participate in public consultation was open to anyone interested	0
2.4. Everyone involved/registered had an opportunity to provide feedback on a policy document	2
Overall score for criteria 3: Effectiveness of the process	2.5
3.1. Announcement was disseminated reasonably (one week) early before the event	3
3.2. Information in the announcement is sufficient	3
3.3. Public consultations were conducted in at least two formats (the document was sent on emails, discussions organized, posted online, CSO working groups, etc.)	1
3.4. Multiple feedback mechanisms were ensured	2
3.5. Sufficient time (minimum one weeks) was provided for feedback on policy document/brief	3
3.6. Public consultations were conducted at least at three different stages of policy development.	3
Overall score for criteria 4: Accountability	1.0
4.1. Summary report on public consultations corresponds to the requirements of AoG	N/A
4.2. Justified explanation of the accepted/rejected feedback provided.	1
Overall score for criteria 5: Diversity of participants	0.3
5.1. Equal representation of different genders among participants	1
5.2. Equal representation of minorities among participants	0
5.3. Concrete measures were taken to ensure diversity	0
Total score	0.9
Overall score for criteria 6: Public engagement/interest (coordination agency perspective)	1.8
6.1. Number of CSO/individuals engaged (announcement)	1
6.2. Number of unique feedback contributors	1
6.3. Coordinating agencies' evaluation of CSO engagement	2
6.4. Feedback was provided within the set deadline	3

2021-2030 Strategy of Migration

The public consultations on the 2021-2030 Strategy of Migration met most criteria of the good practices measured with the PCI (total score - 1.6/3). The highest score was achieved on the criterion measuring accountability (3/3), meaning that after the consultations the coordination agency provided a justified explanation of the accepted/rejected feedback. Compliance with this standard increased the meaningfulness of the process and credibility of the coordination agency. The coordination agency should be particularly commended for its effort to produce a detailed summary report that complies with the requirements of the AoG. The strategy minimally meets the standards on the criteria measuring accessibility (0.8/3), openness (0.8/3), and diversity of participants (0.7/3). It is essential to make public consultations open for a wider public and not target the organizations with specialist know-how.

On the criteria measuring public engagement/interest, the strategy scored 2 out of 3, because only a half-dozen of participants/CSOs were involved. However, it should be underlined that not all invited CSOs expressed their interest or provided feedback on public consultations. Therefore, despite the efforts from the coordination agency, the number of involved participants remained low. That is why the public engagement criterion is measured separately from the PCI and does not affect the average total score of 1.6 (out of 3).

Indicator/Criterion	Score
Overall score for criteria 1: Accessibility	0.8
1.1. Announcement disseminated was accessible for diverse groups (language accessibility, clarity, etc.)	0
1.2. Announcement and/or policy brief were disseminated through multiple channels	0
1.3. Policy document/brief was accessible for diverse groups (language accessibility, clarity, etc.)	2
1.4. Process was adapted to the needs of diverse groups (pwd, ethnic minority, etc.)	1
Overall score for criteria 2: Openness	0.8
2.1. Announcement on public consultations was openly available	0
2.2. Policy document/brief was publicly available	0
2.3. Opportunity to participate in public consultation was open to anyone interested	0
2.4. Everyone involved/registered had an opportunity to provide feedback on a policy document	3
Overall score for criteria 3: Effectiveness of the process	2.8
3.1. Announcement was disseminated reasonably (one week) early before the event	3
3.2. Information in the announcement is sufficient	3
3.3. Public consultations were conducted in at least two formats (the document was sent on emails, discussions organized, posted online, CSO working groups, etc.)	3
3.4. Multiple feedback mechanisms were ensured	3
3.5. Sufficient time (minimum one weeks) was provided for feedback on policy document/brief	3
3.6. Public consultations were conducted at least at three different stages of policy development.	2
Overall score for criteria 4: Accountability	3.0
4.1. Summary report on public consultations corresponds to the requirements of AoG	3
4.2. Justified explanation of the accepted/rejected feedback provided.	3

Overall score for criteria 5: Diversity of participants	0.7
5.1. Equal representation of different genders among participants	2
5.2. Equal representation of minorities among participants	0
5.3. Concrete measures were taken to ensure diversity	0
Total score	1.6
Overall score for criteria 6: Public engagement/interest (coordination agency perspective)	2.0
6.1. Number of CSO/individuals engaged (announcement)	1
6.2. Number of unique feedback contributors	1
6.3. Coordinating agencies' evaluation of CSO engagement	3
6.4. Feedback was provided within the set deadline	3

State Strategy for Youth Policy Development 2020-2025

The strategy for State Youth Policy 2020 – 2025 achieved one of the highest scores on the PCI (total score - 2.6/3), meaning that the public consultation met most criteria of the good international practices and the relevant local standards. In terms of accessibility, the announcement and policy document were distributed via the Facebook page, emails, and the website, however, the information was not adapted to the minority languages. Owing to the efforts to include pwd groups, this strategy received the highest average score in Accessibility compared to the rest. The strategy received a full score (3/3) for the openness of the process. The information was publicly available, and anyone could provide feedback either by attending the meeting or commenting online. The process was effectively planned and executed, receiving 3/3. All five sub-criteria were fully met and in line with the regulations and requirements around planning and conducting public consultations. In terms of accountability, the report lacked the summary of the comments that were either reflected, partially reflected, or not reflected at all (which resulted in a score of 2 out of 3). Since the strategy involved several hundred participants, representation of different genders and minorities was achieved, however, specific measures ensuring diversity could be improved.

From the coordinating agency perspective, the participants were well eager to provide feedback (2.8/3). In total, around 550 participants were engaged. There were slight delays in the feedback provision. Overall, the consultation process was a mutually beneficial activity for both the coordinating agency and the participants.

Indicator/Criterion	Score
Overall score for criteria 1: Accessibility	2
1.1. Announcement disseminated was accessible for diverse groups (language accessibility, clarity, etc.)	2
1.2. Announcement and/or policy brief were disseminated through multiple channels	3
1.3. Policy document/brief was accessible for diverse groups (language accessibility, clarity, etc.)	1
1.4. Process was adapted to the needs of diverse groups (pwd, ethnic minority, etc.)	2
Overall score for criteria 2: Openness	3
2.1. Announcement on public consultations was openly available	3

2.2. Policy document/brief was publicly available	3
2.3. Opportunity to participate in public consultation was open to anyone interested	3
2.4. Everyone involved/registered had an opportunity to provide feedback on a policy document	3
Overall score for criteria 3: Effectiveness of the process	3
3.1. Announcement was disseminated reasonably (one week) early before the event	3
3.2. Information in the announcement is sufficient	3
3.3. Public consultations were conducted in at least two formats (the document was sent on emails, discussions organized, posted online, CSO working groups, etc.)	3
3.4. Multiple feedback mechanisms were ensured	3
3.5. Sufficient time (minimum one weeks) was provided for feedback on policy document/brief	3
3.6. Public consultations were conducted at least at three different stages of policy development.	3
Overall score for criteria 4: Accountability	2.5
4.1. Summary report on public consultations corresponds to the requirements of AoG	2
4.2. Justified explanation of the accepted/rejected feedback provided.	3
Overall score for criteria 5: Diversity of participants	2.7
5.1. Equal representation of different genders among participants	3
5.2. Equal representation of minorities among participants	3
5.3. Concrete measures were taken to ensure diversity	2
Total score	2.6
Overall score for criteria 6: Public engagement/interest (coordination agency perspective)	2.8
6.1. Number of CSO/individuals engaged (announcement)	3
6.2. Number of unique feedback contributors	3
6.3. Coordinating agencies' evaluation of CSO engagement	3
6.4. Feedback was provided within the set deadline	2

Nationally Defined Contribution (NDC) (2021-2030) and Climate Action Plan (CAP) (2021-2023)

The Nationally Defined Contribution (NDC) and Climate Action Plan (CAP) achieved one of the highest scores on the PCI (total score - 2.4/3), meaning that the public consultation met most criteria of the good international practices and the relevant local standards. The strategy fully meets the PCI requirements on the criteria measuring the effectiveness of the process, accountability, and openness. The strategy scores lowest on the accessibility and diversity criteria (1.5/3 for both) as the announcement was disseminated through multiple channels (including Facebook and emails) and was not accessible for diverse groups. In addition, the process was not adapted to the special needs of minority groups, and both the announcement and policy document were available only in the Georgian language. Overall, even though more effort is needed to ensure the inclusion of minority groups, the NCD and CAP is one of the successful examples of an effective and meaningful public consultation process.

From the coordination agency's perspective, the public engagement and interest were also high (2.5/3). Around 90 CSO were actively involved in the process. Most of the engaged CSOs provided meaningful feedback.

Indicator/Criterion	Score
Overall score for criteria 1: Accessibility	1.5
1.1. Announcement disseminated was accessible for diverse groups (language accessibility, clarity, etc.)	1
1.2. Announcement and/or policy brief were disseminated through multiple channels	3
1.3. Policy document/brief was accessible for diverse groups (language accessibility, clarity, etc.)	1
1.4. Process was adapted to the needs of diverse groups (pwd, ethnic minority, etc.)	1
Overall score for criteria 2: Openness	2.8
2.1. Announcement on public consultations was openly available	3
2.2. Policy document/brief was publicly available	3
2.3. Opportunity to participate in public consultation was open to anyone interested	3
2.4. Everyone involved/registered had an opportunity to provide feedback on a policy document	2
Overall score for criteria 3: Effectiveness of the process	3
3.1. Announcement was disseminated reasonably (one week) early before the event	3
3.2. Information in the announcement is sufficient	3
3.3. Public consultations were conducted in at least two formats (the document was sent on emails, discussions organized, posted online, CSO working groups, etc.)	3
3.4. Multiple feedback mechanisms were ensured	3
3.5. Sufficient time (minimum one weeks) was provided for feedback on policy document/brief	3
3.6. Public consultations were conducted at least at three different stages of policy development.	3
Overall score for criteria 4: Accountability	3
4.1. Summary report on public consultations corresponds to the requirements of AoG	3
4.2. Justified explanation of the accepted/rejected feedback provided.	3

Overall score for criteria 5: Diversity of participants	1.5
5.1. Equal representation of different genders among participants	3
5.2. Equal representation of minorities among participants	N/A
5.3. Concrete measures were taken to ensure diversity	0
Total score	2.4
Overall score for criteria 6: Public engagement/interest (coordination agency perspective)	2.5
6.1. Number of CSO/individuals engaged (announcement)	3
6.2. Number of unique feedback contributors	3
6.3. Coordinating agencies' evaluation of CSO engagement	3
6.4. Feedback was provided within the set deadline	1

Rustavi Atmospheric Air Quality Management Action Plan (2020-2022)

The public consultations on the Rustavi Atmospheric Air Quality Management Plan partially met the aspects of the good practices measured with the PCI (total score - 1.9/3). The highest score was achieved on the criteria measuring openness (3/3), meaning that all four sub-criteria were fully met and in line with the regulations and requirements of planning and conducting public consultations. Furthermore, the information was publicly available and anyone could provide feedback either by attending the meeting or commenting online. The strategy minimally meets the standards on the criteria measuring diversity of participants (0.7/3). The process was not adapted to the needs of diverse groups and diversity of participants was not ensured.

On the criteria measuring public engagement/interest, the strategy scored 1.8 out of 3, because a small number of participants/CSOs were involved. Therefore, despite the efforts from the coordination agency, the number of involved participants remained low. That is why the public engagement criterion is measured separately from the PCI and does not affect the total average score.

Indicator/Criterion	Score
Overall score for criteria 1: Accessibility	1.3
1.1. Announcement disseminated was accessible for diverse groups (language accessibility, clarity, etc.)	1
1.2. Announcement and/or policy brief were disseminated through multiple channels	3
1.3. Policy document/brief was accessible for diverse groups (language accessibility, clarity, etc.)	1
1.4. Process was adapted to the needs of diverse groups (pwd, ethnic minority, etc.)	0
Overall score for criteria 2: Openness	3
2.1. Announcement on public consultations was openly available	3
2.2. Policy document/brief was publicly available	3
2.3. Opportunity to participate in public consultation was open to anyone interested	3

2.4. Everyone involved/registered had an opportunity to provide feedback on a policy document	3
Overall score for criteria 3: Effectiveness of the process	2.7
3.1. Announcement was disseminated reasonably (one week) early before the event	3
3.2. Information in the announcement is sufficient	2
3.3. Public consultations were conducted in at least two formats (the document was sent on emails, discussions organized, posted online, CSO working groups, etc.)	3
3.4. Multiple feedback mechanisms were ensured	3
3.5. Sufficient time (minimum one weeks) was provided for feedback on policy document/brief	3
3.6. Public consultations were conducted at least at three different stages of policy development.	2
Overall score for criteria 4: Accountability	2.0
4.1. Summary report on public consultations corresponds to the requirements of AoG	1
4.2. Justified explanation of the accepted/rejected feedback provided.	3
Overall score for criteria 5: Diversity of participants	0.7
5.1. Equal representation of different genders among participants	2
5.2. Equal representation of minorities among participants	0
5.3. Concrete measures were taken to ensure diversity	0
Total score	1.9
Overall score for criteria 6: Public engagement/interest (coordination agency perspective)	1.8
6.1. Number of CSO/individuals engaged (announcement)	2
6.2. Number of unique feedback contributors	1
6.3. Coordinating agencies' evaluation of CSO engagement	1
6.4. Feedback was provided within the set deadline	3

2020-2023 Strategy for Public Service Creation, Delivery, Quality Assurance, and Evaluation and 2020-2021 action plan

The public consultations on the Strategy for Public Service Creation, Delivery, Quality Assurance, and Evaluation minimally met the PCI standards (total score - 1.1/3). The consultations met most aspects of the indicators on the criterion measuring the effectiveness of the process (1.5/3) and minimally satisfied the standards regarding the openness (1/3). Besides, it needs to be underlined that only one CSO took part in the public consultations. Participation in public consultations was possible by the invitation from the coordination agency and no open announcement was made. The highest score was achieved on the accountability criterion 2.5/3. This implies that the summary report on the public consultations corresponds to the requirements of the AoG and a justified explanation of the accepted/rejected feedback was provided in the summary report. The lowest scores were achieved on the criteria measuring accessibility (0.3/3) and diversity (0/3). This means that the policy document/brief was not accessible for diverse groups and the process was not adapted to the needs of diverse groups. It should also be noted that the coordination agency did not make any public announcements about the consultation.

On the criteria measuring public engagement/interest, the strategy scored 1.3 out of 3. Although the consultations were closed and only invited CSO representatives could participate, the coordination agency made an effort to invite several CSOs. However, the response rate was low and only one CSO provided feedback. That is why the public engagement criterion is measured separately from the PCI and does not affect the total average score.

Indicator/Criterion	Score
Overall score for criteria 1: Accessibility	0.3
1.1. Announcement disseminated was accessible for diverse groups (language accessibility, clarity, etc.)	0
1.2. Announcement and/or policy brief were disseminated through multiple channels	0
1.3. Policy document/brief was accessible for diverse groups (language accessibility, clarity, etc.)	1
1.4. Process was adapted to the needs of diverse groups (pwd, ethnic minority, etc.)	0
Overall score for criteria 2: Openness	1
2.1. Announcement on public consultations was openly available	0
2.2. Policy document/brief was publicly available	0
2.3. Opportunity to participate in public consultation was open to anyone interested	1
2.4. Everyone involved/registered had an opportunity to provide feedback on a policy document	3
Overall score for criteria 3: Effectiveness of the process	1.5
3.1. Announcement was disseminated reasonably (one week) early before the event	N/A
3.2. Information in the announcement is sufficient	N/A
3.3. Public consultations were conducted in at least two formats (the document was sent on emails, discussions organized, posted online, CSO working groups, etc.)	1
3.4. Multiple feedback mechanisms were ensured	1
3.5. Sufficient time (minimum one weeks) was provided for feedback on policy document/brief	3
3.6. Public consultations were conducted at least at three different stages of policy development.	1
Overall score for criteria 4: Accountability	2.5

4.1. Summary report on public consultations corresponds to the requirements of AoG	3
4.2. Justified explanation of the accepted/rejected feedback provided.	2
Overall score for criteria 5: Diversity of participants	0
5.1. Equal representation of different genders among participants	N/A
5.2. Equal representation of minorities among participants	N/A
5.3. Concrete measures were taken to ensure diversity	0
Total score	1.1
Overall score for criteria 6: Public engagement/interest (coordination agency perspective)	1.3
6.1. Number of CSO/individuals engaged (announcement)	1
6.2. Number of unique feedback contributors	1
6.3. Coordinating agencies' evaluation of CSO engagement	1
6.4. Feedback was provided within the set deadline	2

