



**THE SUBMISSION OF THE ‘ALL FOR EDUCATION!’
NATIONAL CIVIL SOCIETY COALITION TO THE THIRD CYCLE OF
UNIVERSAL PERIODIC REVIEW OF THE
UNITED NATIONS HUMAN RIGHTS COUNCIL**

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‘All for Education!’ (AFE) National Civil Society Coalition is a new, diverse, inclusive, human rights/gender-equality based, democratic and transparent civil society coalition to advocate for education policy and system. AFE was established in September 2010, and it consists of 27 highly committed NGOs, groups and individuals, including children and youth, ethnic and sexual minorities, parents of children with disabilities, teacher’s union, human rights and women’s rights groups, child protection NGOs, consumer rights NGO, and local groups in 6 aimags and 2 remote districts. The members work in a mutually supportive, complementary manner, building each other’s capacity through experience sharing and mutual learning, creating new meanings, new knowledge and new traditions related to education, human rights and civil society in the Mongolian context. AFE Coalition is engaging in UPR process first time with support from NHRA in UN RCO in Mongolia.

Implementation of right to education and policy development

1. In March 2016, the Parliament of Mongolia adopted “Sustainable Development Vision-2030” (SDV) in line with Global SDGs, adopted by the UNGA in 2015 based on the consensus of major political parties. The review of the alignment of Government policies with the SDV revealed that the key policy documents are not fully aligned with global SDGs, they are heavily focused on promotion of economic growth, diversification, and infrastructure building. Several SDGs which are at the heart of "Leaving No One behind"- notably, gender equality and reducing inequalities, have been reflected in the general principles, and lack specific targets/objectives and actions. The SDV does not sufficiently recognize the trade-offs and synergies between economic, social and environmental dimensions of development¹.
2. In February 2018, the Government of Mongolia approved the "Three Pillar Development Policy" (TPDP) which is serving as the key guideline for investment decisions in the coming two fiscal years. Like the SDV-2030, TPDP is strongly oriented toward reinvigorating sustainable economic growth. Similar to the SDV, the TPDP did not elaborate the key SDGs in detail, such as gender, social inequality and addressing climate change. In general, only about one-fifth of the 169 SDG targets are addressed by the TPDP objectives, and a majority of actions (51%) being concentrated on a single goal, namely SDG 8, promotion of employment and sustainable economic growth².
3. AFE Coalition concludes that the above-mentioned policy documents mainly focused on increasing access to education rather than improving the quality of education which is main issue to tackle in Mongolian education sector. The action plan to implement the contains an objective in terms of making progress in the students’ performance, quality of teaching in schools and improve teaching methodologies together with assessment, but it says that local administrative and education authorities should be responsible for taking suitable actions and mobilizing local financial resources. AFE Coalition is doubtful about the successful implementation of this kind of policy documents to reach an ambitious goal of “quality education for all”.
4. Youth representatives from member organizations of “All for Education!” National Civil Society Coalition of Mongolia carried out an analysis on policy coherence and alignment of the main policy documents of education sector, namely, SDV-2030”, “National Education Policy” and the Government Action Plan 2016-2020 with SDG 4 targets.
5. An analysis revealed that:
 - Majority of the policies and objectives set up to increase the access to education.
 - Important concepts and principles, such as life long learning, inclusive education and quality of education as well as ensuring equity in education have not been sufficiently reflected in those policy documents.
 - Some objectives and targets of these policy papers were identified incoherent and in conflict with each other³.

¹ Mongolia. SDGs Mainstreaming, Acceleration and policy support, UN-ADB Joint Mission report, UB, 2018

² Ibid

³ Outcome document of the AFE National Forum “Education: Quality, Financing, and Accountability” sent to MOE, 2016

6. "Assessment of Institutional Mechanisms and Governance structures for Coordinating, Monitoring and Evaluating implementation of the SDV were performed by UNDP and it calls GoM to develop "Institutional Reform Roadmap" aiming to strengthen the planning and policy analysis functions. "Development finance assessment" conducted by UNDP on 2017-2018 to map sources of public and private financing for development and recommends strategies to mobilizing for the SDGs. With the support of/from UNDP, Ulaanbaatar city Governor's office has developed the SDG Roadmap and SDG targets and indicators. At the provincial level, UNDP also assisted to draft aimag development vision documents that integrate the SDGs and key objectives of Mongolia's Green development policy. The methodology for a nationwide Local Development Index is also now being revised to strengthen local application, with a view to inform resource allocation of the national budget.
7. A joint United Nations-Asian Development Bank MAPS was initiated to advise the Government on how to achieve key social and environmental outcomes of the SDGs within the constraints of the IMF Extended Fund Facility fiscal adjustment package.
8. The recently released joint mission report provides a shared analysis of who is being left behind, recommends targeted policy measures to enhance development outcomes in the social and environmental dimensions, as well as improve equity. It will also make suggestions for developing performance management and financial tracking systems for the SDGs, along with related budget expenditures.
9. Considering Mongolia's population is increasing, the state budget allocation in the social sectors should be increased at least 2.2% in real terms (i.e annual population growth rate), just to maintain the same level of services. The UN / ADB Working Group warns that more and more investment will be needed to improve the quality of social services, if the government aims to continue its population growth policy in the future.
10. The budget for the MECSS grew at nominal terms between 2016 and 2018 respectively, but fell by 6.7% in 2017 at real terms, went up by 25.8% in 2018. Education expenditure share in GDP was 5% in 2016 and fluctuated by dropping to 4.5% and rose to 4.8 percent in 2017 and 2018 respectively. The capital budget was increased by 47.0 percent in 2018, which was higher than recurrent budget (16.2 percent), indicating a government policy of investing in physical assets, such as infrastructure and construction. The education budget for 2018 is planned to be extended to improve the coverage of the kindergartens and improve school buildings and dormitory facilities. A total of 236.9 billion MNT was allocated for this purpose. These investments are intended to relieve overcrowding in schools and kindergartens and improve learning environment.
11. Mongolian CSOs started working on the SDG implementation in their respective areas, however GO-SCO engagement is not institutionalised at the national level. SDG-CSOs" network has been established. One representative from CSO joined the Government led working group, which was tasked to prepare National Voluntary Review (VNR). CSOs have also been invited to prepare input for each SDGs and contribute to the VNR preparation process. CSOs are presenting their inputs to the Government led working group members. AFE Mongolia has prepared and submitted report on SDG4.
12. Government of Mongolia decided to set up the working group with the representatives of all line ministries and main state agencies in order to define the key indicators of the

SDG targets at national level. Group of specialized researchers from different sectors, experts and some CSO representatives were also invited to the working group.

13. The SDG indicator availability in Mongolia has significant gaps. Several assessments of indicator availability have been completed and the NSO has also identified four SDGs that require extra attention because they are important, lack available indicators in the Mongolian context. Furthermore, many of the indicators under all SDGs that are available do not meet the disaggregated requirements of the SDGs. These are the SDGs on poverty, hunger, education, and gender. Seven indicators are unavailable under SDG 1 (poverty), seven are unavailable under SDG 2 (hunger), five are unavailable under SDG 4 (education), and eight are unavailable under SDG 5 (gender). The Government of Mongolia requested technical assistance (TA) from the ADB to support the National Statistics Office (NSO) to improve Mongolia's capacity to measure the abovementioned SDG indicators. ADB representatives organized meeting with CSOs and both parties exchanged information about reliable data sources that can be utilized for producing SDG 4 key indicators.
14. It is commendable efforts that the government of Mongolia, in particular MECSS is committed/initiated to involve CSOs in the policy consultations on localization and implementation process of SDGs, receive feedback and consult with CSOs.
15. There has been considerable progress in the legal environment to implement the SDG 4 at the national level. In 2016, the Law on the rights of persons with disabilities and the Law on the rights of the child and child protection were adopted by the parliament. In relation to the law enforcement, 2 main programs are being implemented at the national level.
25. State policy on education 2014-2024 was approved in 2015 and it was satisfactorily aligned with SDG4 in terms of inclusion of the children with disabilities by providing them equal access to education and taking actions to improve the school dormitory conditions in rural areas to ensure learning circumstances of herders' children. Regulation on conducting lessons on equivalency programs for elementary and secondary education and regulation on supervising/supporting the continuing access to basic education(service) of children, who affected by domestic violence have been recently adopted, thus the legal environment to ensure the right to education of vulnerable groups has been improved.
26. In order to accelerate the implementation of the SDG 4, MECSS is conducting Education policy review in collaboration with UNESCO and Education sector review with support from ADB bringing together different/main stakeholders, including CSOs. Based on the results/outcomes of these policy analyses, long-term education sector development plan will be designed/formulated.
27. Ensuring equity despite learners' difference/diversity by safeguarding inclusive education for all children, non-discrimination, ethnic minority children's education and inclusive education of the children with disabilities and lifelong learning, quality and access to education are regarded as the main research themes.
28. In order to enroll all children in kindergartens and primary, secondary schools, the special emphasis is placed on the availability of schools and kindergartens therefore state budget and investment in education has been substantially increased. In 2019, a total of about 239 billion tugrugs (\$90mln) were allocated/invested to the education

sector to construct newly 162 schools and kindergartens⁴.

29. Policy decisions have been made in several areas to create child-friendly learning environment in terms of improving students' performance. First, noticeable progress has been made in child protection areas by ensuring safe, child-friendly environments in schools, dormitories and kindergartens in relation to the prevention of non-discrimination, violence and bullying in education establishments. Second, the code of ethics for teachers have been revised and approved.
30. MECSS, Metropolitan Education Department, education departments of districts and provinces and other public agencies in the education sector are now using Education management information system (EMIS), which was designed to collect integrated statistical data, analysis and create electronic information database of the education sector. This education management information system is now being expanded in capacity and schools, kindergartens, teachers, students and parents are able to access the system. Electronic information database is expected to be used for further data analysis and its outcomes will bring positive impact on the evidence-based policy and program development by relevant decision makers. Thus, electronic database will also facilitate education authorities to make decisions in relation to taking relevant measures and monitoring all activities of each school and kindergarten (drop-outs, class size, migration of students, data collection/reporting and examination results etc.) in due course.

All children, youth and adults could not receive equitable education.

31. When we look deeply into the database of Social Indicator Sample Survey which was used by the NSO as a data source for monitoring the SDG4 global indicators, namely primary and secondary school enrollment rate, literacy rate, and one-year pre-school attendance rate of children over the last 3 years in Mongolia indicates that there is noticeable difference between students in terms of socioeconomic status, gender and location (urban, rural) and so on.
32. More than 70 percent of children aged 3-5 years are going to kindergartens and 9 percent of all children are attending the alternative pre-school services. Difference in pre-school attendance rate is drawing attention, because it caused by the geographical location, ethnicity and household income level. The mobile or ger kindergartens are most commonly used to target the nomadic population. Cognitive and non-cognitive skills among children enrolled in ger kindergartens, more than halfway through the three- to four-week operation of these kindergartens, lag significantly behind those of children in fixed kindergartens. The study about child development stages of young children involved in kindergartens shows that there is a big gap in the school readiness and it mainly depends on the children's socioeconomic status⁵. Being male, of Kazakh

⁴Website of MECSS, 2019

⁵Poor/wealthy

ethnicity, or needing special assistance in the classroom was associated with poorer outcomes⁶.

33. In the case of primary and secondary education enrollment rate, the parity index from the NSO indicates similar pattern with the abovementioned study results. According to the gender analysis, percentage of enrolment of female and male students shows not significant difference of 0.8% at primary level but gradually increased at secondary level (4.2%) and finally a big difference of 10.7 % in enrolling high schools. It could be mainly related to the traditional gender stereotypes that boys are able to do any work or labor, whilst girls are weaker and vulnerable people, so they should become well-educated person. On the other hand, it is believed to be linked to the necessities of mobile/nomadic animal husbandry, which requires men's labor all year round.
34. If you consider socioeconomic background, there is a big gap in high school attendance rate. Data shows that less than 70% of children from poorer families finish their high schooling. In contrast, about 96% of children from wealthier families complete their high schools.
35. In relation to the parity index of location, data illustrates similar pattern with that of social groups. There is slight difference in primary school enrollment rate between rural (97.5%) and urban (98.5%) areas. Gap widens and raises concern with high school enrollment, because less than 80 of students finish their high schools in the countryside compared to 90% of students in urban areas.
36. The net enrollment ratio in primary education has reached almost 100%, however, children with disabilities and children from ethnic minorities experience low-enrollment rate and there is no right approach, appropriate methodology for inclusive education for them⁷.
37. SDG 4 targets to ensure inclusion and equity in education could not only be determined by the percentage of enrollment, but by active engagement in a day-to-day learning activities, successful completion of every phase (high school-college, university-undergraduate etc.) of education.

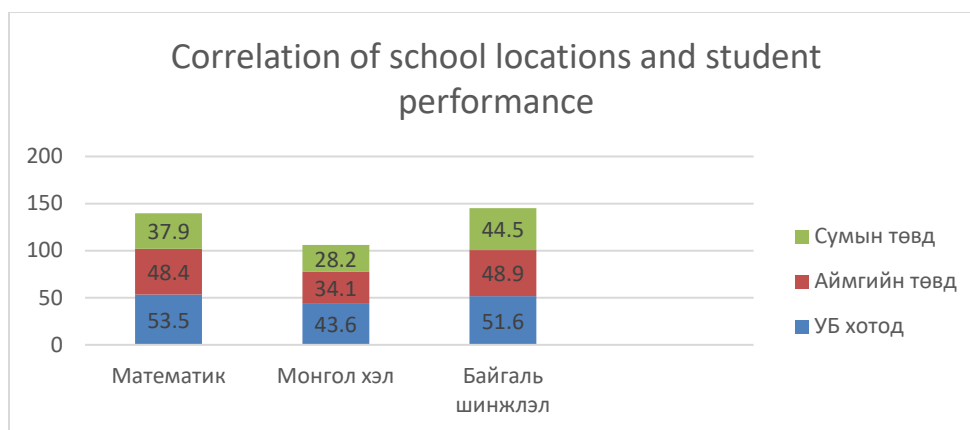
Achievement gaps of children in urban and rural areas

38. According to the results of a qualitative study that included/covered 10 percent of 5th graders of elementary schools in 2016-2017 academic year, the average academic achievement rate of grade 5 students in primary education was 44.8 percent. (48.6% in mathematics - 36.6% in Mongolian language and science-49.2%)⁸. Deeper analysis of the qualitative study revealed that 5th graders in soum schools have underperformed in comparison to their counterparts in the schools of provincial centers and Ulaanbaatar schools.

⁶ Pre-Primary Education in Mongolia. Access, Quality of Service Delivery, & Child Development Outcomes, March 2017, World Bank

⁷National program on child development and protection, 2017, Government of Mongolia

⁸Education Evaluation Centre under MESCS, 2017



39. 9th grade students were taken examinations in the following subjects Mongolian language, mathematics and science (biology, chemistry, physics, geography) and social science-based examination (including contents of social studies, Mongolian history and English). According to the survey, exam results indicated similar pattern, 9th graders in soum secondary schools received lower marks than the students, studying in schools of provincial centers and Ulaanbaatar city.

Examinations	Schools by location		
	UB	Provincial center	Soum/village
Mathematics	30.9	26.1	24.5
Mongolian language	48.7	47.6	44.3
Natural science	33.0	29.3	29.5
Social science	43.7	35.8	35.6

40. The UN has defined the absence of universal access to social services such as, inclusion of all in education and health services, and provision of safe drinking water as well as clean environment with hygiene and sanitation as a major barrier in “No-one left behind” the global SDGs implementation process⁹. One of the fundamental consequences/reasons is related to the quality and consistency¹⁰ of government policies and legislation, in terms of creating and enforcing legislation and translating policies into programs and action plans.

41. Disparities in access to quality education have become more pronounced since 2004, after a series of education sector reforms undertaken during and after the transition from the 10 to the 12-year education system. These reforms have benefited mainly a small number of schools in Ulaanbaatar and provincial/aimag centers that are already

⁹The *United Nations Development Assistance Framework*, 2017-2021

¹⁰Global Governance index, 2017, World Bank. GGI for Mongolia was stagnant at 44,1% from 2006 to 2011 and in 2016 showed slight increase of 52.4%.

better off in terms of educational infrastructure and resources. In contrast, schools in remote rural areas are particularly disadvantaged in these dimensions¹¹.

The majority of children who are out-of-school or dropped out their school are children and young people with disabilities.

42. There are 10,407 children with disabilities, aged 0-17 years old. When the children with disabilities is approached from perspectives of types of disabilities, the largest amount or 21.2% represents those with mobility disabilities whereas the children with hearing impairments were estimated to be the least or 7.6%. 12.1% of the children with disabilities have visual impairment, 8.3% of the children with disabilities have speech impairment, 17.6% of them have mental disability and 9.8% of them have combined form of disability. According to the study conducted by the MECSS, “about 40 percent of children with disabilities study in kindergartens and primary schools, whereas this percentage declines in secondary school stage, only 14% of children with disabilities is attending general secondary and high schools¹²”.
43. Inclusive education of children with disabilities in regular schools remains a challenge for us, because Mongolia is a sparsely populated country with vast territory. A special school system, had been developed to deliver rehabilitation, recreational and independence services to children with disabilities since 1964, has become a hindrance to the introduction of a new inclusive education policy introduction. The concept of inclusion¹³ still remains to be focused on children with disabilities whilst inclusion of children from the disadvantaged groups, such as children from minority groups and poor households is still new concept in the society.
44. There is no reliable data is in place on the numbers of school-aged children with disabilities until today. It demonstrates the lack of knowledge and understanding about disability, to ensure rigorous early identification, assessment and reporting etc.
45. The certain facts about children with disabilities, for instance they tend to start school later than the official school entry age (children with disabilities are likely to drop out, especially from grade 1, JICA) and/or live far from their schools (herder's children aren't possible to go to school from home, lack of access to dormitories, etc.), so children with disabilities could not enroll in schools or dropped out of schools earlier, at primary level.
46. The majority of children with disabilities who didn't enroll schools and dropped out of schools were children, who have multiple disabilities, children with mobility impairment and children with mental disability¹⁴.
47. Survey was carried out to identify the current situation of out-of-school children with disabilities. Most parents of children with disabilities responded that the main reason of out-of-school children because of 'my child's disability'. Lack of understanding of the

¹¹Inclusive and sustainable growth Assessment, Mongolia, 2017–2020, ADB

¹²National Program on rights, participation and development of people with disabilities. 2017, Government of Mongolia

¹³Early childhood development and disability: Discussion paper, WHO, UNICEF, 2012 “Inclusive education is a process of strengthening the capacity of the education system to reach out to all learners—including those with disabilities—and can thus be understood as a key strategy to achieve EFA.”

¹⁴Situation of Out-of school children with disabilities, 2017, JICA-RI

peers without disability or parents of children without disabilities came 2nd and 3rd highest reasons.

48. Disparities in access to quality education have become more pronounced recently. Government has increased the budget allocated to special (schools for children with disabilities) schools, and the variable cost per child is 30% higher than that of regular schools. However, 1040 children with disabilities studying in National Lifelong Education Centers and 7279 children with disabilities attending formal schools do not receive the above-mentioned funding.

Conclusion and recommendations:

1. It is necessary to institutionalize the involvement/participation process of civil society organizations at the parliament and government level, for instance on how to work with NDA. It is also important to accept data resources collected by CSOs as key indicators and provide opportunities for CSOs to have involved in the monitoring and evaluation of SDG implementation process. Thus, those operations should be funded by state budget and it will require to conduct participatory planning based on the participatory planning at the level of line ministriesthrough holding series of professional, multi-stakeholder discussions.
2. Government of Mongolia has taken a series of measures in relation to policy planning, such as improving policy coordination, defining the highest level of decision-making authority to ensure inter-sectoral coordination and adequately reflecting/allocating financing/state budget for implementation of the SDGs and SDV-2030 prioritized targets as well as establishing system/mechanism to monitor and evaluate the SDG implementation and integration process in the country. However, CSOs are criticizing government actions/efforts, that making very slow progress in terms of policy planning and implementation.
3. Through sufficient fund and allocation for individual child to realize Individual education plan, which is central to achieving high quality education for learners with disabilities and to provide incentives and reasonable accommodations responsive to the individual needs of children with disabilities.
4. SDV-2030 policy document needs to be revised in line with the global SDGs. As experts examined the document, 5 out of 10 targets of SDG 4 have not been embedded in SDV-2030 at all, while 2 targets are inserted in the principles of the SDV, and only 3 targets are clearly included (word by word) in this policy document. This analysis led CSOs to conclude that further revision is necessary for SDV-2030 policy document.
5. The content of the State Policy on Education is regarded to be relatively consistent with SDG 4 content, so new Education Sector Development Plan needs to be aligned with these policies.
6. Measures and budget for improvement of quality of education could not be diverted to the local (administration) level. It is important to develop specific policy documents at the national level to align it with other policy and budget allocations that influence on the quality improvement, including education financing, teacher training and professional development for teachers and school leaders.
7. We recommend that government should set the goal and work to legalize pre-school

education in order to invest in the wellbeing of future citizens. In doing so, at least a one-year, good quality, free, compulsory pre-school education should be guaranteed for all young children to support early childhood development and prepare them to enroll in primary schools. Pre-school education program needs a comprehensive curriculum to maintain overall development (the emotional, social and physical development) of young children.

8. With regards to all marginalized groups of students in Mongolia, such as children with disabilities, ethnic minorities, children of herders, children of (internal) migrants in/to Ulaanbaatar and children in dormitories, it is recommended to use parity index to measure group differences in enrolment, participation in learning process and learning outcomes.
9. Key indicators of education sector in SDV-2030 should not be relied/based on average performance rate/outcomes of students, (instead) diversity in schools needs to be considered in the key indicators by scrutinizing class size in primary, secondary and high schools in different (urban-city center, ger districts, rural/countryside-soums, provincial centers) areas/locations, depending on their type, private or public.
10. In terms of planning, implementing and evaluating policies, government should take into account of the specificity the country and the active engagement of CSOs to ensure evidence-based, stable policy and practice in the education sector. For instance, dormitory issues, quality and access to pre-school education of herders' children, age of admission to school and inequalities in gender (concerning boys' education) as well as rapid growth of private schools/institutions without proper regulation from the state etc.
11. To develop and approve national programs aligning with the concept of inclusion in education, consider to eliminate inequity in funding/financing.
12. Take immediate viable/workable measures aimed at identifying and eliminating barriers for children who have never attended school or dropped out of school.
13. To develop a revised draft of Education Law within the framework of SDG4 concepts, including inclusion, equitable and quality education and lifelong learning while ensuring meaningful participation of civil society organizations, parents, researchers, academia and students in the process.
14. Implement policies specifically aimed at further improvement of schools in soums, provincial centers and suburban areas and modify policies which are segregating and deepening differences between schools, such as establishing laboratory schools, public bilingual schools with international programs etc.
15. All citizens should acquire and apply a range of skills to find possible solutions on unprecedented challenges, key issues at local/national and global level, through receiving Education for Sustainable Development and Global citizenship education.
16. Enhance the flexibility of education provision by recognizing knowledge and skills acquired in a non-formal, in formal settings and accept to transfer as credits in education institutions.
17. In order to meet the students' and other stakeholders' needs and demands, the quality standards in higher education institutions should be lifted and their functions need to be strengthened by revising all policies, measures, planned processes and actions accordingly. Need to design curriculum and programs aimed at increasing the access of

good quality, distance learning, internships and enhancing academic research capacity as well as teaching and learning process in universities. Online, corresponding courses should be made available to the public with appropriate financing and technology utilization.

18. Take measures to build capacity of secondary schools with the purpose of addressing pressing issues, such as discrimination, violence and negative peer pressure, bullying, alcohol and tobacco use of children. In relation to this, new form of funding ought to be established for "Child protection in education settings" (means 'school and dormitory') program.
19. Set up a mechanism to provide opportunities for main stakeholders to consult about education issues at national/provincial and local level. Following functions could be assigned:
 - Define priorities and strategies for education policy;
 - Develop/design programs;
 - Action planning;
 - Identify the feasible ways to conduct monitoring and evaluation;
 - Explore solutions on funding/financing.
20. Create an opportunity for citizens and CSOs to use the "Education management information system" data sources and make publicly available all information about education statistics, budget and finance, ongoing projects and programs, except for the results or outcomes of children's performance.
21. Improve per capita funding formula to be used for funding of pre-school, primary and secondary schools in order to increase its ability to meet schools' needs in an efficient and equitable manner taking into consideration the equity variable related to student and school background which is uncontrollable by the school itself.
22. Policies on education financing need to be made to ensure inclusion and equitability and state budget ought to be allocated and spent efficiently and effectively. (Schools should be managed well financially. Thus, more budgets spending in schools should lead to higher learners' achievement; learners from poorer family will achieve noticeable progress in their achievement).
23. CSOs are worrying about inappropriate education financing and budget planning policy, because it might lead to the intensification of inequality in the sector. 1) three state-owned bilingual (Cambridge) schools and 31 so-called laboratory schools have been receiving significant amount of budget from state compared to ordinary schools in recent years, 2) variable cost (per student) is still being allocated for private schools from the state budget.
24. a) Clarify the definition of "for profit" and "non-profit" statuses of private schools and institutions in relevant legislation, b) Stop allocating variable costs and other expenses per student/child from the state budget to profit making commercial schools. In order to protect child right to education and the interests of parents who chose private school for their children, a role of the government in regulation and coordination of private schools (and their effectiveness) must be strengthened.