GENDER EQUALITY PLAN (GEP)

OCTOBER 2023
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Introduction

Gender equality is at the core of RAEWW’s mission, and its fair balance is a crucial component for the Greek Regulatory Authority for Energy, Waste & Water to ensure fair access for its personnel i.e. expert scientists, technical, administrative and support personnel. Responding to the current requirements and incorporating Acts drawn up both at national level (National Action Plan for Gender Equality 2021-2025) and at European level (Gender Equality Strategy for 2020-2025, Gender equality in the European Research Area), RAEWW commits itself to systematizing its practices through the adoption of an effective Gender Equality Plan (GEP).

The GEP follows the guidelines and specifications of Horizon Europe1, the new European Union (EU) Framework Program for Research and Innovation for 2021-2027, and meets the four-mandatory process-related requirements:

• It constitutes a strategic document of the organization, signed by the top management, which has been published on the official website of the Authority and actively communicated to all members of RAEWW.

• It provides for dedicated resources and expertise in gender equality to implement the plan and support an ongoing process of sustainable organizational change.

• It is based on the collection and analysis of data on each gender regarding the personnel of our Institution and ensures that the data is published and monitored on an annual basis to inform the GEP’s objectives and targets, indicators, and ongoing evaluation of progress.

• It includes information, awareness-raising and aims to support training actions on gender equality which engage and address all members of RAEWW to be an evidence-based, ongoing and long-term process.

Thus, the goals of the GEP are:

• The recording of the current situation as formed by the procedures and practices applied in RAEWW, to identify possible gaps or weaknesses in the equal treatment of genders.

• The identification and application of corrective actions.

• The goals setting and their monitoring through specific indicators.

The Regulatory Framework

This GEP legitimates and protects every strategy with the aim of achieving gender equality at RAEWW. It incorporates national and European laws and aligns with Greek initiatives and actions, focusing on equality of women and men rights, discrimination barriers, equal treatment, harassment in the workplace, social responsibility of organizations. Specific articles, policies and directives can be found here below:

European Union Law

TFEU

• Article 157 TFEU states:

1. Each Member State shall ensure that the principle of equal remuneration male and female workers for equal work or work of equal importance is applied.

2. For this Article, “remuneration” means the ordinary basic or minimum wage or salary
and any other consideration, either in cash or in kind, which the worker receives directly or indirectly, in respect of his/her employment, from his/her employer. Equal payment without discrimination based on sex means:

a. that payment for the same work at piece rates shall be calculated on the basis of the same unit of measurement.

b. that payment for work at time rates shall be the same for the same job.

3. The European Parliament and the Council, acting in accordance with the legislative procedure, and after consulting the Economic and Social Committee, shall adopt measures to ensure the application of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation, including the principle of equal payment for equal work or work of equal value.

4. Having as a purpose to ensure full equality in practice between men and women in work environment, the principle of equal treatment shall not prevent any Member State from maintaining or adopting measures providing with specific advantages to make it easier for the underrepresented sex to pursue a vocational activity or to compensate for disadvantages in professional careers.”

**Chapter of Fundamental Rights of the EU**

- **Article 21(1)** states: “Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited”.

- **Article 23** states: “Equality between women and men must be ensured in all areas, including employment, work and pay. The principle of equality shall not prevent the maintenance or adoption of measures providing for specific advantages in favour of the under-represented sex”.

**Directives**


- **Council Directive 2010/18/EU** of 8 March 2010 implementing the revised Framework Agreement on parental leave concluded by BUSINESSEUROPE, UEAPME, CEEP and ETUC and repealing Directive 96/34/EC (Text with EEA relevance)


- **Directive 2006/54/EC** of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast)


- **Council Directive 2000/43/EC** of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin

- **Council Directive 96/34/EC** of 3 June 1996 on the framework agreement on parental leave concluded by UNICE, CEEP and the ETUC

- **Council Directive 92/85/EEC** of 19 October 1992 on the introduction of actions to encourage improvements in the safety and health at work of pregnant workers and workers who have
recently given birth or are breastfeeding (tenth individual Directive within the meaning of Article 16 (1) of Directive 89/391/EEC)

- **Council Directive 76/207/EEC** of 9 February 1976 on the implementation of the principle of equal treatment for men and women as regards access to employment, vocational training and promotion, and working conditions

Greek Law

**Constitution**
- **Article 4(2)** provides: “Greek men and women have equal rights and obligations”
- **Article 22(1)(b)** states: “All workers, irrespective of sex or other discriminations, have a right to equal pay for work of equal value”
- **Article 116(2)** states that: “Positive measures aiming at promoting equality between men and women do not constitute discrimination on ground of sex. The State shall take measures to eliminate inequalities existing in practice, in particular those detrimental to women.”

**Laws**
- **Act 4075/2012**, Articles 48-54, “Incorporation into Greek Law of Directive 2010/18/EU of the


- **National General Collective Agreements (NGCAs).**

  **Relevant national legislation:**


  5
The Operational Regime

This GEP has been approved by the Board of Directors of RAEEWW (Act 164/06.10.2023), by which it is embedded within the work of the regulatory authority in accordance with the Regulation of the Internal Operation and Organization currently in force.

The Objectives of GEP

RAEEWW’s GEP has six tangible objectives, towards:

2. Fostering a work-life balance and organizational culture
3. Preventing and combating gender stereotypes, discrimination, sexism, and violence against women
4. Developing decision-making policy more representative by including more women in the process thus ensuring diversification of viewpoints.
5. Becoming an attractive professional environment for female experts and talents in science and engineering from Greece and abroad.
6. Contributing to the national and European needs for female STEM experts.

To achieve these objectives RAEEWW focuses on four key areas, following the guidelines of the European Institute for Gender Equality (EIGE) aiming to “identify and implement innovative strategies to promote cultural change and equal opportunities” (EIGE, http://eige.europa.eu). These areas are:

Key Area 1: Governance and decision making.

Key Area 2: Recruitment, Selection procedures, and Career Progression

Key Area 3: Flexible and Agile Working

Key Area 4: Gender in Organization Culture

The selected Key Areas comprise set of objectives, measures, targets and KPIs, where the gender dimension will be studied and monitored, the respective timeline, the personnel responsible for each action, as well as the relevance of the Key Areas to SDGs (Sustainable Development Goals) and especially SDG 5.

The Methodology

Following the methodological steps of:

Understanding → Planning → Implementing → Monitoring [EIGE]

RAEEWW undertook initial work to understand and analyze the status aiming to address imbalances in all four areas if possible. The analysis of the present status – identification of
strengths and weaknesses relating to gender equality issues – was based on the collection and analysis of statistical data collected from the HR Department. The planning of activities was based on the systematization of existing good practices and/or the adoption of new ones.

However, for the future steps, a Gep Committee will undertake the task of following up, monitoring, scheduling/prioritizing of the desired interventions to monitor progress and be responsible for annual reviewing. The implementation of any intervention requires an inclusive approach from the commitment of the upper management to the active involvement of all staff members. The mindset behind the success is “responsibility of the individual and collaboration with the team”. Pilot activities will be implemented, if necessary, to feedback on the effectiveness of the proposed activities and/or assist in the fine-tuning of their parameters. In addition, the necessary financial resources must be available in RAEWW’s annual budget for the purposes of presentations and workshops on the equality of the sexes in the working environment.

As a final step, control, and self-assessment based on proper indicators ensure that the GEP is a dynamic document and that the interventions proposed have a real impact. The typology of the indicators, the time frame, and the target values which they compare with, are selected on a consensus basis. Thus, the GEP is an open, adaptable manual evolving together with the evolution of the genders’ equality.

The Current Status

To identify the status (2023) of the gender equality practices in RAEWW within the areas previously identified, the following practices were used:

1. Aggregation of the composition of the Board of Directors (governing body) of RAEWW over the period 2010-2023.

2. Aggregation of the woman / man personnel data for the year 2023.

3. Aggregation of the woman / man personnel data over the period 2020-2023.

Key Area 1: Governance and decision making.

Governance and decision making are the responsibility of RAEWW’s Board of Directors (BoD) which consists of the President, Vice-President A, Vice-President B and 4 members of the BoD;

The following table 1 presents the composition of the BoD for the period 2010-2023.

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</tr>
</thead>
<tbody>
<tr>
<td>Men</td>
<td>7</td>
<td>7</td>
<td>7</td>
<td>7</td>
<td>7</td>
<td>7</td>
<td>5</td>
<td>5</td>
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<td>5</td>
<td>7</td>
<td>7</td>
<td>7</td>
<td>7</td>
</tr>
<tr>
<td>Women</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>2</td>
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<td>2</td>
<td>0</td>
<td>0</td>
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</tr>
</tbody>
</table>
It is worth noting that:

Women representation is extremely low in governance and decision-making body in RAEWW. That means that even though, the EU rules have been transposed into national law, women are still underrepresented and the Greek political leadership that hire the Board members of Directors must promote a more balanced gender representation on Boards.

It is important to mention that, according to the current legislation, RAEWW’s Board members of Directors are jointly proposed by the Ministers of Environment and Energy, Interior and Rural Development and Food following a call published in at least four (4) daily newspapers of nationwide circulation, as well as on the website of the Ministry of Environment and Energy. The proposal is submitted to the Committee on Institutions and Transparency of the Hellenic Parliament. The members are appointed by an Act of the Council of Ministers.

The gender gap in decision making representation could be that women are sometimes reluctant to apply for such positions, especially in male-dominated contexts. This can be explained by a variety of factors. The still very masculine image of governance, the way informal networks continue to function in selection processes and the fact that the bulk of high-level positions remain occupied by men are just some of the elements that convey the message that there is limited or no place for women at the top.

The leadership of the institution and its decision-making bodies need to be gender-balanced for the organization to truly live up to its values. Women and men should have equal access to and a balanced participation in leadership and decision-making structures. Based on the provisions of the recent Law 5037/2023, the Board members of RAEWWs’ are expected to increase from 7 to 13. Under this respect, we certainly need more women capable of managing fairly and effectively to get the message clearly across to society that worthy women must have the same access to positions of responsibility as worthy men.

**Key Area 2: Recruitment, Selection procedures, and Career Progression**

It must be noted that the recruitment of personnel with indefinite term private law contracts depends mostly on the Greek Supreme Council for Civil Personnel Selection while the recruitment of personnel with short term private law contracts takes place by RAEWW’s own procedures based on the principles of gender balance and equal opportunity.

The following tables depict the gender distribution of RAEWW’s personnel on 20/09/2023, in relation to several parameters like number of employees by gender, level of education and position in head managements and departments.
RAEWW currently employs 93 employees under indefinite and short-term private law contracts. Of these employees, fifty-seven (57) are women and thirty-six (36) are men and in percentages of 61.3% and 39.7% respectively.

Table 2: Gender vs level of education

It’s worth mentioning, that among the total fifty-five (57) women employees under indefinite and short-term private law contracts, forty-eight (48) of them are university graduates plus three (3) more who got PGD degrees. That reaches a percentage of 89.5% of highly skilled females who work at RAEWW now.
Men who have university degrees follow with a percentage of 83.3% respectively.

Table 3: Gender vs positions of responsibility

At present, the positions of Heads of Managements and Heads of Departments (Independent and not) are up to twenty-one (21) and are occupied by five (5) men and sixteen (16) women, at a rate of 23.8% and 76.2%, respectively.

The numbers clearly speak for themselves and depict the policy of gender equality to selection, recruitment, equal rights, equal obligations, and equal opportunities. It can be easily understood from the above data that the current situation is particularly satisfactory as it reflects in practice both the quantitative equality of men and women in the workplace, as well as the possibilities-opportunities for promotion of all employees to hierarchically higher positions. There are no stereotypes regarding women's leadership skills and abilities even though that women in Greece are often called to choose between a career in leadership positions and family care, which act as a deterrent to their advancement to upper and senior leadership positions of the institution. At RAEWW, it is offered a gender-inclusive and gender-sensitive encouraging environment for equal female participation in leadership roles and the promotion of actions combating gender stereotypes.

**Key Area 3: Flexible and Agile Working**

The undertaken study revealed the following perceptions of RAEWW’s personnel with regards to the flexible and agile working:

Table 4: Gender vs childcare responsibilities
Currently, twenty-one (21) out of a total of fifty-five (57) women and ten (10) out of thirty-six (36) men have youngsters’ care responsibilities in percentages of 36.8% and 28% respectively.

The benefits the staff members with childcare responsibilities are entitled to are stipulated by Greek legislature which has conformed with the EU prerequisites.

RAEWW has always raised awareness of rights, opportunities, and practices for flexible and agile working to facilitate work-life balance among its employees of both sexes. The HR department informs the staff regularly upon new legislations and directives of the Greek Ministry of Internal Affairs.

Thus, there is 119 days total of maternity leave before and after giving birth. After that period, parents with a fixed term law contract in RAEWW are entitled to work one hour less per day for up to 30 months after maternity leave and, with the employer’s agreement, can convert this reduced working time into a block or blocks of time within the 30 months after maternity leave. Optional leave is available to mothers who have exhausted the regular maternity leave period and possibly the approximately 3.5 months of reduced working hours if taken in one block without losing pay.

Parents with indefinite term law contracts in RAEWW are entitled to five months total of maternity leave before and after giving birth. After that period, they can work one or two hours less per day until the child gets 6 years old or an optional leave is available to mothers for nine (9) months of reduced working hours if taken in one block without losing pay. Additionally, there is a choice for parental leave with pay for up to five (5) years.

Moreover, there is a variety of policies regarding the promotion of work-life balance between women and men, such as choice of flexible working hours, regular leaves, parental leaves, and teleworking.
However, for the future, it is deemed necessary to collect qualitative data for all staff categories, for instance, on the use of parental leave, childcare leave, the percentage of employees who cannot take regular leave on the dates they prefer, etc. to evaluate the staff’s response to the above-mentioned policies. It should also be examined how mothers manage with their youngsters during holidays and vacations, when schools and kindergartens, are closed and how RAEWW could afford more facilities for that need.

Additionally, there is provision by the Greek law both for mothers and fathers who have children with special needs and for employees with special needs and chronic diseases such as flexible forms of work, teleworking, and special leaves without losing pay.

**Key Area 4: Gender in Organization Culture**

Table 5: Permanent staff vs vacancies in the sector of Energy and Administrative Services

<table>
<thead>
<tr>
<th>PERMANENT STAFF</th>
<th>TOTAL STAFF POSITIONS</th>
<th>ACTIVELY STAFFED POSITIONS</th>
<th>STAFFING AVERAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>EXPERTS</td>
<td>178</td>
<td>19</td>
<td>11%</td>
</tr>
<tr>
<td>ADMINISTRATIVE/TECHNICAL STAFF</td>
<td>118</td>
<td>18</td>
<td>15%</td>
</tr>
<tr>
<td>LAWYERS</td>
<td>17</td>
<td>5</td>
<td>29%</td>
</tr>
<tr>
<td>TOTAL STAFF NEEDS</td>
<td>312</td>
<td>42</td>
<td>14%</td>
</tr>
</tbody>
</table>

RAEWW is staffed 86% less than its full capacity. Today, its permanent personnel (expert scientists, technical, administrative and lawyers with indefinite term contracts) amounts to forty-two (42) employees out of a total of three hundred and twenty-two (312) legislated positions to be staffed for the needs of the Administrative Services and the sectors of Energy, Waste and Water.

Low salaries are a main obstacle RAEWW faces during the process of recruitment and development of its human resources due to the economic restrictions and uniform payrolls in all public sector enforced by the Law 4354/2015. Although, there is equal payment by law in both sexes, this equality doesn’t meet the expectations of young talents to build a career in the Authority who ultimately seek a better future abroad or get a job to private companies who can give better wages and renumeration packages.

Between 01.01.2020 until today, 16 employees with short term law contracts (10 women and 6 men) have resigned plus 20 more employees with short term law contracts make continuous use
of multi-year leaves to work as experts into European Organizations abroad.

Additionally, 48 employees with short term law contracts have resigned (24 women and 24 men) through the same period.

Efforts are constantly made by the Board members to break free from the economic austerity of Law 4354/2015 but until now this hasn’t been possible, which prevents RAEWW from attracting STEM experts and highly skilled females and males.

• **Policy against gender-based violence including sexual harassment.**

RAEWW has always promoted a dignified working environment against any kind of gender-based violence including sexual harassment by establishing and codifying the expected behaviors of employees. Until today, no such incidents have been revealed or addressed by the employees.

However, the recent Ministerial Act of Internal Affairs, OJ B 343/26.01.2023, set a coherent and modern framework for preventing and addressing violence and harassment in institutions of the public sector, helping to create a working environment which respects, promotes, and safeguards the right of every person to a world of work without violence and harassment.

According to the above-mentioned legal framework, all employees may state any action of abuse through specific robust reporting channels for guidance, support, legal proceedings, and disciplinary / grievance procedures if necessary.

Under this respect, RAEWW is going to conform accordingly to establish a culture of zero tolerance towards sexual harassment and gender-based violence.

However, for the future, it is deemed necessary to collect qualitative data for all staff categories, to evaluate the employees’ response to the above-mentioned policies.

**The Key Areas of Intervention and Priorities**

The following tables present the objectives, measures and KPIs set for each Key area.
## Key area 1: Governance and Decision Making

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Measures</th>
<th>2023</th>
<th>2024</th>
<th>2025</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Gender balance in all key decision-making bodies (Board of Directors, etc.)</td>
<td>1. Stronger focus on supporting gender-balanced expertise for managerial bodies</td>
<td></td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>2. Chairs of key decision-making bodies to consist of balanced numbers W/M</td>
<td></td>
<td>✓</td>
<td></td>
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<tr>
<td></td>
<td>3. Guidelines and incentives aiming at women’s participation in administrative bodies</td>
<td></td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>4. Equality, diversity and inclusion principles embedded into governance and strategic planning</td>
<td></td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>II. Creation of structures to support gender equality.</td>
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<tr>
<td>III. Oversight of organizational processes in relation to gender</td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

### Who:
1. BoD
2. BoD
3. BoD
4. BoD

### KPIs and Targets:
1. To the maximum extent possible
2. To the maximum extent possible
3. Annual revision of GEP
4. To the maximum extent possible
<table>
<thead>
<tr>
<th>Key area 2: Recruitment, Selection procedures and Career Progression</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Objectives</strong></td>
</tr>
<tr>
<td>-----------------</td>
</tr>
<tr>
<td>I. Career advancement interventions for women professional support</td>
</tr>
<tr>
<td>II. Gender proof recruitment selection</td>
</tr>
<tr>
<td>III. Attract female applicants in senior posts</td>
</tr>
<tr>
<td>IV. Emphasis on the education and career development of female resources</td>
</tr>
<tr>
<td><strong>Who:</strong></td>
</tr>
<tr>
<td>1. BoD</td>
</tr>
<tr>
<td>2. BoD</td>
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<tr>
<td>3. BoD</td>
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</table>
### Key area 3: Flexible and Agile Working

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Measures</th>
<th>2023</th>
<th>2024</th>
<th>2025</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Structures for supporting personnel members with caring responsibilities.</td>
<td>1. Flexible working models (part-time/remote working etc.)</td>
<td>☑</td>
<td></td>
<td></td>
</tr>
<tr>
<td>II. Promote integration of work with family and personal life</td>
<td>2. Guidelines for work-life balance and information to the staff</td>
<td>☑</td>
<td></td>
<td></td>
</tr>
<tr>
<td>III. Provision of care facilities and services to mothers with youngsters</td>
<td>3. Explore new data and keep up with new policies EU enforces through Greek legislation</td>
<td></td>
<td>☑</td>
<td></td>
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<tr>
<td>IV. Collect qualitative data for all staff categories, for instance, on the use of parental leave, childcare leave e.t.c.</td>
<td>4. The analysis of qualitative data will give more information for the optimization of flexible and agile working</td>
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<td>☑</td>
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</tbody>
</table>

### Who:
1. HR Dptm
2. HR Dptm
3. HR Dptm
4. GEP Committee

### KPIs and Targets:
1. Formation of the regulatory framework
2. 1st draft in 2023
3. Detailed job descriptions
4. In place since 2020
### Key area 4: Gender in Organization Culture

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Measures</th>
<th>2023</th>
<th>2024</th>
<th>2025</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Monitor higher wages and gender balance ratio to attract brain-drain stem scientists</td>
<td>1. Intensify the efforts for financial independency from the State to give wages and remuneration packages to keep our staff of both sexes</td>
<td></td>
<td></td>
<td>✓</td>
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<tr>
<td></td>
<td>2. Intensify the efforts for the procedures to complete new recruitment procedures under the gender balance policy</td>
<td></td>
<td>✓</td>
<td></td>
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<tr>
<td></td>
<td>3. Organization of events on gender diversity and equality raising awareness to all our staff for a zero-tolerance harassment environment</td>
<td>✓</td>
<td></td>
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<tr>
<td></td>
<td>4. Offering a support service for the prevention, detection and report of discrimination and behaviors of harassment or violence based on gender</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>II. Proceed to new recruitments of permanent staff</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>III. Create events on sensitive topics regarding gender equality</td>
<td></td>
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<tr>
<td>IV. Encourage personnel to report incidents of harassment with respect to GDPR</td>
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<tr>
<td>V. Establish procedures for reporting incidents of gender-based violence and for the prosecution of perpetrators, while creating a safe environment</td>
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</tbody>
</table>

**Who:**
1. BoD
2. GEP Committee
3. GEP Committee
4. HR department

**KPIs and Targets:**
1. 1 update per year
2. 1 per year
3. Board of members