



Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO)

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Comments on the UN CEDAW Committee's Draft Update of General Recommendation No. 19 (1992): accelerating elimination of gender-based violence against women

I. Introduction

- GREVIO stresses the importance of the role of General Recommendation No.19 in raising awareness of violence against women as a human rights issue.
- GREVIO welcomes the initiative taken by the CEDAW Committee to update this Recommendation, and congratulates the Committee on including a comprehensive understanding of the due diligence principle.
- GREVIO also welcomes the fact that the draft update of General Recommendation No.19 recognises that violence against women is still a persistent global problem and that in some countries it has even increased in severity.
- GREVIO notes in particular the attention paid to the impact of intersectional discrimination on women victims of violence.
- GREVIO welcomes the CEDAW Committee's determination to accelerate the elimination of violence against women and girls.
- GREVIO commends the CEDAW Committee for its clear commitment to build not only on its own practice, including its supervision of the implementation of Recommendation No.19, but also that of other bodies, in particular the UN Special Rapporteur on Violence against Women, its Causes and Consequences.

II. General comments on the draft update

GREVIO suggests strengthening three aspects of the draft update of General Recommendation No.19. **First**, the need for a co-ordinated and comprehensive policy as well as sufficient financial and human resources for its implementation, which are of paramount importance in eliminating violence against women and girls. Work to eliminate and prevent violence against women and girls is severely underfunded in many or all regions of the world and this contributes to the prevalence of violence against women remaining high. Resources have to allow for a comprehensive approach that addresses the root causes as much as issues of accountability, redress and long term consequences of violence. Public funding needs to be secure over time to make policies and measures sustainable.

Secondly, GREVIO suggests adding the need to strengthen the role of women's NGOs. There is evidence that countries with many and active women's NGOs have made more progress in enacting protective legislation, carrying out awareness raising activities and providing support to victims. While the draft update of General Recommendation No.19

points to the crucial role of women's NGOs, this might be highlighted by introducing a separate section on this subject. A section especially dedicated to the role of women's NGOs would allow the CEDAW Committee to address the fact that women's NGOs are often working under difficult circumstances, that they are discredited and sometimes even persecuted, as well as hindered in their work by undemocratic forces. They need to be recognised, protected as human rights defenders and provided with resources to support their work.

Thirdly, GREVIO proposes to highlight more specifically the fact that social and economic rights are crucial for the protection of women from violence. Violence against women is deeply rooted in the historically unequal power relationship between men and women which creates a system of dependence and exploitation of women. This would significantly add to the current focus that is mainly on legal protection and remedies which may pose the danger of overlooking areas of great importance for a life free from violence, such as social and economic rights.

III. Comments on the draft update in more detail:

On page 11, before the section on Data collection and monitoring, GREVIO suggests to insert a section on "**Co-ordinated policies and funding**" to be followed by a section on "**The role of women's NGOs**".

Co-ordinated policies and funding (proposed new section before section on Data collection)

- Develop and implement effective policies and legislation to prevent and eliminate violence against women in all areas (policy, prevention, provision, prosecution) and ensure that such policies are co-ordinated and integrated and focus on the human rights and needs of all women victims of violence, especially the need to be safe and live free from violence.
- Designate one or more co-ordinating bodies to develop and implement such policies, including all relevant governmental bodies as well as experts from women's NGOs working to eliminate violence and other civil society groups in the field.
- (former f, p.12) Establish short, mid and long-term financial plans, defining all costs for the implementation of the necessary policies and measures to prevent VAW&G in all areas (policy, prevention, provision, prosecution) and provide budgets to allocate appropriate human and financial resources to all areas.

The role of women's NGOs (proposed separate section after Co-ordinated policies, suggested above)

- Recognise that women's NGOs play a crucial role in preventing violence against women and girls in all policy areas and that their work should be recognised and supported and close co-operation should be established with them.
- Ensure that women's NGOs can carry out their work freely and without obstacles, discredit or threats.
- Recall the Agreed Conclusions of the 57th session of the Commission on the Status of Women ("CSW"): "Support and protect those who are committed to eliminate violence against women, including women human rights defenders in this regard, who face particular risks of violence" (Agreed conclusions of the 57th Session of the CSW 2013 on the elimination and prevention of all forms of violence against women and girls).

Provision and social economic rights

To highlight the importance of providing specialist support and economic empowerment to women, GREVIO suggests inserting, after the section on Protection and redress (p.10), a section on Provision and support, and to shift measures concerning provision and support to this section.

- Add to section iii., third sentence, the following text shown in italics, to strengthen the requirement that women victims should benefit from specialised services:
Besides general services such as health and social services which provide first assistance and refer victims, [...] states should provide specialist women's support services such as 24-hour helplines, and sufficient numbers of safe and adequately equipped crisis, support and referral centres [...].
- Ensure that women victims of violence and their children have access to social rights and rights ensuring their economic empowerment, such as the right to financial support when they have no income of their own, the right to education and employment, protection in their employment of women affected by violence, free child care and affordable housing, in order to be able to live free from violence and without being dependent on an abusive partner.