

Women for Women's Human Rights – New Ways' (WWHR) submission of comments and suggestions on the on the Draft update of General Recommendation No. 19 Gender Based Violence Against Women.

Submitted on 30 September 2016

Section: Scope

Paragraph 7

We would like to suggest the addition of “substantive” to the paragraph to refer to the principle of “substantive equality”. “...right to non-discrimination and the enjoyment of **substantive** equality...”

Paragraph 9

We strongly support the emphasis on Gender based violence (GBV) affecting women throughout their life cycle and the specific mentioning of girls. We would also like to suggest the addition of “older women” as “..includes girls **and older women.**” Older women face GBV against women in differential and strong ways as age becomes a ground for intersectional discrimination.

Paragraph 10

In this paragraph we would like to suggest to amend the first sentence as “The Committee considers that gender-based violence against women is **one of** the fundamental social, political and economic mechanisms by which the subordinate position of women with respect to men and their stereotyped roles are perpetuated” We believe that while GBV is an important driver and reinforce of gender-based discrimination and inequality between women and men, the presence of other social, political and economic mechanisms should also be acknowledged.

We would like to suggest the addition of “Throughout its work, the Committee has made clear that this violence is a critical obstacle to achieving equality between women and men in the enjoyment of **their** human rights according to the Convention.” We believe such a change can emphasize “women's human rights” separately and support the terminology can notion what we have built on for decades.

Section: General obligations of States parties under the Convention relating to gender-based violence against women

Paragraph 14b

We believe that the political discourse, provided by the state officials in all levels, regarding the equality between women and men and GBV against women, is an important tool to shape the execution of the obligations of the state to eliminate GBV against women by the state officials at the lower levels of the execution, directly or indirectly. For that reason, we would like to suggest a stronger emphasis to this point, by the addition of a sentence to this paragraph to the

extend of “...negligent response. **State officials must exemplify a political discourse that is in support of and conducive for the elimination of all forms of discrimination against women and GBV against women.** Appropriate measures...”

Section: Recommendations

Paragraph 15b

As mentioned the active participation of relevant stakeholders, especially of women’s organizations is crucial to mapping out the methods of prevention necessary. We would like to suggest the addition of “with the active **and well resourced** participation of all relevant stakeholders, such as women’s organisations,” as in many countries the women’s organizations, and many other human rights organizations face serious lack of funding, which could prevent them from engaging in such mechanisms. To avoid this, the state should be able to provide the means for the effective and active participation of these organizations to the processes on developing and implementing effective measures against the elimination of GBV against women.

Paragraph 15j(i)

We believe that extending the subarticle by “provisions that allow **early, child and forced** marriage ...” would be important, as this provides for a greater interpretation of the subarticle to other marriages that violate women’s human rights.¹

Section: Data Collection and Monitoring

a)

We believe an emphasis at this paragraph to “independent and diverse” women’s organizations would be important to ensure that a wide range of independent perspectives and experiences of such women’s organizations to be represented at the process. “Develop and evaluate all legislation, policies and programmes consultation with civil society organisations, in particular **independent and diverse** women’s organisations.”

In the same paragraph we would like to call for a stronger input from the state for to the work of human rights and women’s non-governmental organizations. “States parties should encourage **and support** the work of human rights and women’s non-governmental organisations.”

¹ More information on why this formulation is preferred by WWHR, can be found at our joint submission with Sexual Rights Initiative to the UN Human Rights Council at https://www.google.com.tr/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0ahUKEwj15J2InbbPAhXIOxQKHecD-MQFggdMAA&url=http%3A%2F%2Fwww.ohchr.org%2FDocuments%2FIssues%2FWomen%2FWRGS%2FForcedMarriage%2FNGO%2FSRI_WWHR.doc&usq=AFQjCNEj-WEz80YPVGwDCYqnyah_0azaxw&sig2=6EIE-EO2vPM8l6AqjgNThA

b)

Considering the different methodologies and capacities of states' statistical institutions, we believe it may be crucial to refer to some of the basic forms of intersectional discrimination against women such as "Data should also be disaggregated in relation to intersecting forms of discrimination against women, **such as race, ethnicity, religion or belief, health, status, age, class, caste, and sexual orientation and gender identity, income among others as appropriate**"²

Section: International cooperation

b)

As an organization working on the SDGs for more than three years, we strongly welcome the reference and connections made to the 2030 Agenda for Sustainable Development and the SDGs in this General Recommendation. We would like to suggest the addition of a reference to the outcome document of the 60th session of the Commission on the Status of Women on the gender responsive implementation of all the 2030 Agenda for Sustainable Development and the SDGs. "Support national plans to implement **all** Sustainable Development Goals **in a gender – responsive manner, in accordance with the Outcome Document of the 60th session of the UN Commission on the Status of Women**, and boost international support and cooperation for knowledge-sharing and effective and targeted capacity-building."

² We believe Especially those intersectional forms of discrimination included in General Recommendation 28, paragraph 18 should be included.