



# NATIONAL ACTION PLANS ON VIOLENCE AGAINST WOMEN IN THE EU

A publication of the EWL Centre on Violence against Women

EWL BAROMETER



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The European Women's Lobby (EWL) is the largest umbrella organisation of women's associations in the European Union (EU), working to promote women's rights and equality between women and men. EWL membership extends to more than 2000 organisations in all EU Member States and Candidate Countries, as well as to European-wide associations.

## Introduction

The European Women's Lobby (EWL), through its Centre on Violence against Women, has been working in close cooperation with the experts of the EWL Observatory on Violence against Women, to come up with an original mapping report of national action plans on violence against women.

The Barometer aims to: take stock of existing National Action Plans (NAPs), voice NGO satisfaction with the consultation process held by their government when drafting/ implementing/evaluating the NAPs, and highlight women's organisations' assessments of the NAPs in their countries.

The Barometer delivers two grades for each country: the first grade evaluates the existence and type of NAP(s), on the basis of the EWL definition of a NAP (see box below); the other grade evaluates the NGO satisfaction of their consultation by the government and allows for a critical analysis of the decision-making/democratic processes.

The Barometer is a very important tool to get a European overview of national actions on violence against women and compare European countries with regards to their commitment to eradicate such violence. EWL members and experts, as well as other women's organisations, are invited to use it to push for concrete and comprehensive national action to eradicate all forms of male violence against women, as well as to put pressure on their governments to ensure that they consult NGOs at all levels of their policy processes.

The Barometer comes at a key time with regards to European policy developments on violence against women. The Council of Europe is finalising its third report on the implementation of Recommendation Rec(2002)5 on the protection of women against violence, based on a questionnaire sent to Council of Europe member states. The Council of Europe is about to adopt a Convention on combating and preventing violence against women and domestic violence. The European Council and the European Parliament have been calling for months on the European Commission to come up with a European Strategy to eradicate all forms of male violence against women.

In this context, the EWL Barometer reflects women's organisations' call for concrete policy action at European level to build a Europe free from all forms of male violence against women.



# The persistent lack of political will to end violence against women in Europe

When including all forms of male violence against women, 45% of all women in Europe have been subjected to and suffered from men's violence.<sup>1</sup> Between 40 and 50% of women in the European Union report some form of sexual harassment in the workplace.<sup>2</sup> It is estimated that every fifth woman in Europe has been subjected to male domestic violence,<sup>3</sup> and that seven women die every day from male domestic violence.<sup>4</sup>

Despite the extreme gravity of this phenomenon, political responses and resources allocated to this issue have been piecemeal, unequal and mostly inadequate at both national and European level. Some countries do however better than others

1 Combating Violence against Women: Stocktaking study on the measures and actions taken in Council of Europe Member States (2006), Council of Europe, Directorate General of Human Rights, Strasbourg

2 European Commission, 1998

3 EWL, Unveiling the hidden data on domestic violence in the EU, 1999

4 Psytel, Estimation de la mortalité liée aux violences conjugales en Europe, Programme Daphne III

and the landscape varies widely. In the absence of any regional framework, the differences in the way governments tackle male violence against women result in different levels of protection of women, prosecution of perpetrators and ways to organise prevention, including service provision and partnership with NGOs.

In 1996, following the 1995 World Conference on Women in Beijing, EU member states committed to developing policy action on eradicating violence against women. Since then, the EU institutions have mainly delivered declarative instruments, which have not led to a concrete regional legally-binding strategy on violence against women. EU member states and neighbouring countries are supposed to abide by the human rights obligations enshrined in United Nations and Council of Europe instruments, but the implementation of such provisions greatly depends on their political will to act to end violence against women.



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# The EWL plays a key role as a watchdog of national policies on violence against women

The European Women's Lobby (EWL), through its Observatory on Violence against Women, regularly develops tools to monitor progress in combating violence against women at national level. In 2007, the EWL published 'Reality Check: When women's NGOs map policies and legislation on violence against women in Europe',<sup>1</sup> which aimed at shadowing the 2006 report of the Council of Europe<sup>2</sup> on the implementation by member states of the Recommendation Rec(2002)5 on the protection of women against violence.<sup>3</sup> The EWL Reality Check highlighted the disparities between what is reported as progress by governments and how this is assessed by experts working in the field.<sup>4</sup> The main inconsistency involves the very definition of violence against women: many governmental responses

1 EWL, Reality Check: When Women's NGOs Map Policies and Legislation on Violence against Women in Europe, 2007

2 Combating violence against women. Stocktaking study on the measures and actions taken in Council of Europe member states. Prepared by Prof. Dr. Carol Hagemann-White with the assistance of Judith Katenbrink and Heike Rabe, University of Osnabrück, Germany. Council of Europe, 2006.

3 Council of Europe, The Protection of Women Against Violence. Recommendation Rec(2002)5 of the Committee of Ministers to Member States on the Protection of Women Against Violence. Adopted on 30 April 2002.

4 Using the indicators developed in EWL's report Towards a common Framework to Monitor Progress in Combating Violence against Women, 2002

seem unaware of the consensus achieved and consequent obligations undertaken at the UN or Council of Europe level, thus defining violence against women narrowly or without any gender dimension.

In 2009, the EWL opened a new consultation of its Observatory experts to update its assessment of national policies on violence against women. When updating our mapping exercise, the EWL and its experts identified two main comparable characteristics:

The existence of NAP(s) and their content, i.e. whether they address all forms of violence against women and whether they are based on the international definition of violence against women which identifies this violence as a cause and consequence of inequality between women and men; The NGOs satisfaction with the consultation process.

By limiting the comparison to these characteristics, the EWL Barometer provides a clear and visible picture of all national policies on violence against women, looking at the specific policy instrument of national action plans and the partnership developed with women's organisations.



## The EWL Barometer focuses on two main comparable characteristics of national policies

The EWL has for many years been advocating for National Action Plans as a key policy to eradicate violence against women. Such an instrument has been defined by the Council of Europe and should therefore be a standard to be reached by all countries in Europe. The EWL believes that a National Action Plan (NAP) on violence against women is the minimum requirement and to some extent, the benchmark against which progress can be measured. A detailed NAP will facilitate comparisons across countries from which a framework for a European action plan will emerge in time. A NAP is also an indicator of the political priority given to the issue of violence against women.

As defined by the Council of Europe, a National Action Plan on violence against women should be a comprehensive, coherent strategy on preventing and combating violence against women. A fully developed NAP on violence against women should spell out measures, name priorities and set a baseline for monitoring. The EWL stresses the need for any NAP on violence against women to include a clear definition of violence against women in which reference should be made to naming the problem, i.e. the structural aspect of male violence against women, to ensure a gender perspective to the policy document and its related actions.

The EWL Reality Check showed that most of the countries in Europe only have partial Action Plans, which address some forms of violence against women but not all, and in many countries, they are gender blind

as they do not refer to the international definition of violence against women. In some countries, plans exist only on paper but are never implemented or do not lead to concrete action. From the NGO point of view, a major positive aspect of NAP (even partial) is considered to be the involvement of and necessary cooperation between several ministries/governmental bodies. NAPs also allow for improvement in legislation or at least outline plans to change or improve legislation and implementation, and most of the time they advocate the need for training for professionals as police, justice and/or health sector.

Another key indicator refers to the building of partnerships between NGOs and policy-makers as part of an overall strategy to address all forms of male violence against women. In many countries women's non-governmental organisations (NGOs) have been the pioneers and sometimes the only service providers, supporting women fleeing situations of male violence. In many countries, these organisations have been instrumental in campaigning for and leading the debate on male violence against women as an issue of public and political concern. While governments are gradually beginning to recognise the essential role of NGOs as indispensable partners and part of a multi-disciplinary approach to addressing male violence against women, this type of recognition does not always lead to adequate support, especially in terms of funding.

For decades, women's NGOs have been



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the main actors in highlighting the need to develop comprehensive policies. Women's NGOs have developed a substantial experience and expertise over the years, often under very precarious financial conditions and/or on a totally voluntary basis, and have provided services, designed and delivered specific training for professionals, analysed the causes and remedies, and lobbied for improved policies and legislations. The EWL Observatory on violence against women has already highlighted the indispensable role of NGOs in delivering services but has also emphasised their role as a high value resource when drafting a NAP and their role as a critical voice to governments' official declarations and commitments. This is the basis for implementing the main message of the Beijing Platform for Action, which calls for co-operation between women's non-governmental organisations and governments.

By combining those two grades, the EWL Barometer aims to deliver an accurate image of the policy context and instruments on combating violence against women in each country. Both grades have to be considered together, as a comprehensive assessment of national policies on violence against women is based on a combination of political will and genuine consultation and work with women's NGOs. Therefore, even if a country may seem to have a strong policy framework, its image might be weakened by the negative rate given by women's NGOs about the consultation process. On the contrary, a national policy giving space and listening to the voice of women's NGOs might nevertheless result in weak NAPs. It is therefore important to mirror the results of the barometer to the political and social situation of each country, in order to understand the current assessment on the basis of historical and political information.



## EWL Barometer - Main Results

### Sweden is the only European country addressing all forms of male violence against women

Only one country in Europe has developed National Action Plans (NAPs) in a comprehensive and gender sensitive way so as to include all forms of male violence against women: Sweden has an Action Plan to combat men's violence against women, violence in the name of honour and violence in same-sex relationships, as well as an action plan on trafficking and prostitution. Sweden is the only country in the EU which has clearly stated that prostitution is a form of male violence against women and an obstacle to equality between women and men.

Other European countries do quite well in terms of addressing the different forms of violence against women in a gender sensitive way, through one or several NAPs: 10 countries have plans or strategies which address some forms of violence against women in a gender sensitive way, therefore demonstrating their political will to acknowledge that violence against women is related to gender inequality. However they do not address all forms of violence against women, therefore leaving space for further violation of women's human rights in their country.

The majority of European countries rate quite badly, as they have developed NAPs which are gender blind. These NAPs address some forms of violence against women (mainly domestic violence and trafficking in human beings), but their approach is based on a neutral definition which doesn't highlight violence against women as a cause and consequence of inequality between women and men. Such policy approaches are very worrying

for women's organisations, as they tend to depoliticise the issue of violence against women by losing the issue in the general issue of violence in the family and by neutralising the societal analysis behind violence against women, which is about unbalanced power relations between women and men, mirroring gender inequality in the public sphere.

One country has no NAP on violence against women (the UK).

### Women's NGOs are disappointed with the way they are consulted on NAPs

The great majority of women's NGOs expressed a strong disappointment with the way they are consulted by national authorities with regards to the elaboration and implementation of the NAPs in their country. Many of them feel that consultation of NGOs is often purely formal and does not aim to include NGOs' perspectives and recommendations within the final policy documents. All NGOs also pointed to the lack of sufficient and sustainable funding to support their work, in both supporting and assisting women victims of male violence, and advocacy work to improve national legislation and good practices.

One country has nevertheless a very good experience with regards its consultation process: Danish NGOs have a positive history of partnership with the national authorities.



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# The EWL Barometer highlights the European tolerance for violence against women

Not addressing violence against women in a gendered framework within NAPs is a sign that governments still fail in/oppose recognising that the different forms of violence against women constitutes human rights violations. There is still strong opposition to acknowledging that male violence against women is a crime committed within a context of power and control used by men against women – for example, rape, forcing them into marriage, prostitution, pornography or sexual harassment.

Failure/opposition to defining violence against women as such results in failure/opposition to recognise the multiple forms of violence against women in society (and lack of knowledge on the prevalence of

different forms). A National Action Plan against violence against women is the minimum requirement and, to some extent, the benchmark against which progress can be measured. It is also an indicator of the political priority given to the issue of violence against women.

This fact has direct consequences on how national policies and legislation perceive the diverse experience of women confronted with male violence against women, resulting in policies and legislations being overwhelmingly insensitive to these experiences, and therefore lacking adequate responses for remedying the situation.



# EWL Barometer 2011

## overview of the grades

### National Action Plan(s) on violence against women

Sweden	NAPs on all forms of VAW or on gender equality in general (incl. VAW), with a gender perspective
France – Finland – Germany – Greece – Iceland – Lithuania – Luxembourg – Serbia – Spain – Turkey	NAPS on specific forms of VAW with a gender perspective
Hungary – Ireland	NAPs on all forms of VAW or on gender equality in general (incl. VAW), but gender blind
Austria – Belgium – Bulgaria – Croatia – Cyprus – Czech Republic – Denmark – Estonia – Latvia – Malta – Poland – Portugal – Romania – Slovakia – Slovenia – Ukraine – Italy	NAPs on specific forms of VAW, but gender blind
UK	No NAP



# EWL Barometer 2011

## overview of the grades

### Level of NGO satisfaction with consultation processes on NAP(s)

Denmark	Very satisfied
Bulgaria – Finland – Iceland – Ireland – Serbia – Spain – UK – Ukraine	Somewhat satisfied
Austria – France – Germany – Lithuania – Luxembourg	Neutral
Belgium – Cyprus – Czech Republic – Estonia – Greece – Hungary – Italy – Latvia – Malta – Portugal – Romania – Sweden – Turkey	Somewhat unsatisfied
Croatia – Poland – Slovakia – Slovenia	Not satisfied



## NATIONAL ANALYSIS

# Austria

NAPs	NGO consultation
	X
X	

Expert to the EWL Observatory on Violence against Women:

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### National Action Plan(s) on violence against women

National Action Plan on trafficking in human beings (2009-2011)  
-> gender blind

National Action Plan on female genital mutilation (2007-2011)  
-> gender blind

### Level of NGO satisfaction with consultation processes on NAP(s)

“Cooperation exists, and the consultation process with governmental institutions is in general quite good, but on the issue of violence against women there is no real progress at the moment.”

### NGO assessment of the implementation of the NAP(s)

Unavailable at present



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# Belgium

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

Irene BALCERS  
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### Expert's general analysis:

Considering the political situation in Belgium (important responsibilities have been transferred to regional structures and there is paralysis at national level), it is difficult to assess the NAP. The Federal Government, Regions and Communities adopted the 4th National Action Plan on violence against partners (2010-2014) in November 2010. In this NAP, other forms of violence are included, such as forced marriage, honor crimes and FGM. However, this NAP includes a set of measures directly related to the communities and regions. The policies and measures are quite different in the French-speaking and Dutch-speaking parts of Belgium. At the federal level, the government undertook a 3rd statistical study on violence and the results were released in late 2010. However, it does not specifically address partner violence but all forms of violence which may be suffered by men and women in society. This combination has created confusion in the publication of results. Research methods have been criticised by specialists on the ground who regret that the research does not target domestic violence specifically.



#### National Action Plan(s) on violence against women

National Action Plan on violence between partners, honor crimes, forced marriages and female genital mutilation (2010-2014)  
→ gender blind

National Action Plan on trafficking in human beings (2008-2011)  
-> gender blind

#### Level of NGO satisfaction with consultation processes on NAP(s)

“We were not satisfied with the way the government recently consulted NGOs on the NAP. The consultation were not efficiently organised; there were no predefined modalities for it in the NAP. Some NGOs were invited, some not, without an explanation for the selection. We would like the encounters between grass-root NGOs and public institutions to be organised through a clear process, with a defined coordinating body and methods. We have to remain very vigilant and pro-active to make our voices heard (which was less the case with the previous NAPs).”

## NATIONAL ANALYSIS

# Belgium

### NGO assessment of the implementation of the NAP(s)

Considering the political situation in Belgium (important responsibilities transferred to regional structures and there is paralysis at national level), it is difficult to assess the NAP. However, there are in this NAP a set of measures directly related to the communities and regions. In the French-speaking part of Belgium, the governments of the Walloon Region and French Community have set up a number of actions on issues of domestic violence, including a free helpline for victims (<http://www.ecouteviolencesconjugales.be/>), increasing the capacity of shelters, training for professionals, qualitative research on domestic violence, etc. Many of the recommendations of NGOs have been taken into account. We therefore see an improvement but we are concerned about the lack of funding, still far from sufficient.



## NATIONAL ANALYSIS

# Bulgaria

NAPs	NGO consultation
	X
X	

Expert to the EWL Observatory on Violence against Women:

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### Expert's general analysis:

The new Bulgarian government elected in mid-2009 started without gender sensitive policy and demonstrated gender blindness and lack of knowledge around the issue of gender equality. This provoked the Bulgarian Women's Lobby and other women's NGOs in Bulgaria to focus more of their work on advocacy and lobbying for gender sensitive policy. Recent governmental decisions around domestic violence funding and in the area of trafficking give some hope that the Government will change its policy and put the eradication of violence against women among national priority areas. This will become clear throughout 2011.

#### National Action Plan(s) on violence against women

National Programme for Prevention and Counteraction of Trafficking in Human Beings and Protection of the Victims (2009)  
→ gender blind

National Strategy of Empowerment of Women (2009-2015)  
→ The strategy states 'Eradication of gender violence and human trafficking' as an objective, and 'increasing the effectiveness of measures against domestic violence' as a task → no concrete steps, gender blind

#### Level of NGO satisfaction with consultation processes on NAP(s)

"Currently, there are two areas where there is a certain level of debate of NGOs with the government: joint work on the Draft Regulation for the application of the Law on Protection against Domestic Violence, and the work on the finalization of the National Referral Mechanism (NRM) for the victims of trafficking.

The work on the Regulation was finalised in autumn 2010 and the representatives of the Alliance for Protection against Domestic Violence (a coalition of NGOs) participated in the process. Currently, the debates focus on the need for the Government to take into account the expertise and needs of NGOs which provide services for the victims, and the need for a more efficient mechanism for financing NGO projects which contribute towards implementation of the law. The fight for more funds from the State budget is also ongoing.

The NRM was prepared with the leadership of one NGO and the Anti-Trafficking Commission and provides also for coordination between NGOs and state institutions for the protection of victims of trafficking.

In addition the Bulgarian Women's Lobby has begun a productive collaboration with the Ministry of Justice in order to push for a strong European convention for the protection of women against male violence."

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## NATIONAL ANALYSIS

# Bulgaria

### NGO assessment of the implementation of the NAP(s)

A NAP on violence against women is not on the agenda of the Bulgarian government. In June 2010 the Cabinet of the Ministry of Labour and Social Affairs (the focal point for Equality between women and men) announced that “there is no need for a gender aspect when discussing a NAP on violence”. This obviously reflected the position of the Bulgarian Government on the Council of Europe Convention on violence against women (CAHVIO) and at the beginning of discussions on the Convention they also refused to consider a gender aspect on the CAHVIO. In September 2010, with the support of the EWL Centre on Violence Against Women, the Bulgarian Women’s Lobby organised several meetings with the governmental representatives working on the Council of Europe Convention on violence against women. The main aim of this campaign was to discuss the real situation in field of violence against women in order to ensure a strong European Convention is passed. As a result the Bulgarian Government changed their position on some articles of the CAHVIO, demonstrating a much more gender sensitive approach.

Domestic violence: During the last months of 2010 the situation in the field of domestic violence (DV) was very dynamic. In October 2011 the planned amount for 2011 for DV was cut by the Government from 500,000 BGN to 50,000 BGN (25,000 Euro). This amount was intended to cover all activities at national level during 2011, including court cases, shelters, prevention campaigns, social work with victims, training of experts, and programs for perpetrators. It was obvious that the planned amount of 25,000 Euro was highly insufficient. The NGOs started a concentrated lobbying campaign, which rejected the Government’s reasons given for the allocation, including the financial crisis and difficult situation of governmental finances. Women’s NGOs made joint efforts to press the Government to provide funds to cover their main activities around the protection of women victims of DV. The Bulgarian Women’s Lobby insisted on sufficient funding and, as a result of negotiations with the Ministry of Justice, on 18th January 2011 the Government announced their decision to provide 500,000 BGN (250,000 Euro) to the NGOs working in the field of DV. After taking part in the application process, successful Bulgarian NGOs will share this amount to fund their work with victims of DV.

Trafficking of women: At the end of 2009 the National Referral Mechanism (NRM) for the victims of trafficking was developed. Until November 2010 the NRM was not high on the Governmental agenda and it was not discussed by the Government. Thanks to the efforts of NGOs and the Bulgarian National Anti-Trafficking Commission the NRM was passed by the Government on 25th November 2010. With the passing of the NRM Bulgaria has made a commitment as a member of the EU to effectively counter trafficking and to provide protection for the victims of trafficking. During the official NRM presentation ceremony the Bulgarian Interior Minister underlined the fact that women and girls are more often victims of trafficking than man.



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## NATIONAL ANALYSIS

### Croatia

NAPs	NGO consultation
	X
X	

Expert to the EWL Observatory on Violence against Women:

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#### Expert's general analysis:

The current situation has not progressed; neither in the implementation of the existing strategies, nor in creation of the National Strategy against all Forms of Violence against Women. There has been no information forthcoming around what progress has taken place on the Strategy against violence against women. NGOs have not been included in consultation processes as representatives of civil society who offer the possibility to consult their service users and/or members, but as individual experts that have not been allowed to share information with other activists before the publication of a final draft. Therefore the majority of women's organisations decided not to join the working group on the drafting of a new National Policy for Gender Equality. It has been proven that NGO participation has not significantly influenced final outcomes, and has merely given more legitimacy to Governmental activities. The presence of civil society activists has not improved the gender perspective of national strategies. Therefore, the majority of NGOs have decided to maintain a critical position. A so called 'neutral perspective' and the 'protection of family' have continued to be the overall principles of Governmental institutions in the creation of strategies that were intended to provide protection from gender based violence.

#### National Action Plan(s) on violence against women

National Strategy on Protection from Family Violence (2011-2016)  
→ gender blind

National Plan for Combating Trafficking in Human Beings (2009-2011)  
→ gender blind

National Policy for the Promotion of Gender Equality (2006-2010)  
→ The National Policy for the Promotion of Gender Equality 2006-2010 contains a provision on the creation of a National Action Plan against Violence against Women – but this provision has not yet been fulfilled.  
Drafting of the new National Policy for the Promotion of Gender Equality (2011-2015) started in September 2010.

National Strategy for the Protection and Promotion of Human Rights (2008-2011)  
→ gender blind

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## NATIONAL ANALYSIS

# Croatia

### Level of NGO satisfaction with consultation processes on NAP(s)

"In 2009 the Croatian Government adopted the Code of Consultation with the Interested Public in the Process of Drafting Laws, other Regulations and Acts. In February 2010, the Government Office for NGOs created a draft of Guidelines and opened a public discussion. However, very few civil society organisations have been participating as this process is highly complicated to follow, and it requires significant involvement, time and knowledge. The Code has been created as an effort to harmonise such processes in Croatia with EU and Council of Europe standards, but many grassroots organisations, particularly women's organisations working against violence against women, are not able to follow it due to an overload of work. Only 4 or 5 civil society organisations in the whole of Croatia have so far followed the Code.

Additionally, many state bodies are working according to old standards and rules, or without any guidelines, as a result of having no capacity/will to follow the Code. It will take a significant amount of time until this good practice is fully implemented.

Experiences of women's organisations and their representatives in the consultation process were quite negative, and many withdrew their participation in working groups due to the low level of inclusion of their contributions in final documents. Most recently, the Women's Network of Croatia was excluded from the entire consultation process and drafting of the new National Policy for the Promotion of Gender Equality (2011-2015) that started in September 2010. This was due to their critical approach to the implementation of the previous National Policy."

### NGO assessment of the implementation of the NAP(s)

A very poor level of implementation of all national policies and strategies is a major problem. The Ministry of Family, War Veterans and Intergenerational Solidarity is one of the implementing bodies of the Strategy of Protection from Family Violence (2008-2010), but it is also appointed to monitor the implementation and report to the Government. In 2009 the Government established a Committee for the Improvement of Protection against Family Violence whose remit is to coordinate, implement and evaluate the Strategy of Protection from Family Violence; it has not met since. Budget provisions are highly vague and also unmonitored.

Regarding National Plan for Combating Trafficking in Human Beings (2009-2011), the Government created a National Committee for Combating Trafficking in Human Beings, a National Coordinator for combating trafficking in human beings and an operative team for combating trafficking in human beings, but no monitoring mechanism was mentioned in the Plan. The allocation of funds was partly outlined in the Plan but remained highly insufficient. The national Coordinator reports to the Government on the annual implementation of the Plan.

Regarding the National Policy for the Promotion of Gender Equality (2006-2010), there is no mention of an allocated budget, the roles of the implementing bodies not clear, and monitoring mechanisms are not mentioned or planned.



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# Cyprus

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

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### Expert's general analysis:

The fact that Cyprus has in the last five years adopted a number of National Action Plans on specific forms of violence against women can be seen as a positive step. However, all the NAPs are either gender blind or do not take a holistic approach to combating all forms of violence against women. In particular, the gender perspective is lacking completely in the area of support and protection to victims. Furthermore, as there is no recognition of violence against women as a cause and consequence of inequality between women and men, prevention measures are inadequate and do not address the root causes of the phenomenon. Another serious challenge is that no specific timelines are set for the implementation of foreseen actions, and funds are not allocated. In terms of NGO consultation, this is limited to those NGOs that participate in specific committees and consultations, and does not extend to the wider civil society.

### National Action Plan(s) on violence against women

National Action Plan for the Prevention and Combating of Violence in the Family (2010-2015)  
→ gender blind

National Action Plan on Combating Trafficking in Persons (2010-2012)  
→ gender blind

National Action Plan on Equality between Men and Women (2007-2013)  
→ reference to 'all forms of violence against women including trafficking in women', but no real action

National Report on Strategies for Social Protection and Social Exclusion (2008-2010)  
→ gender blind

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## NATIONAL ANALYSIS

# Cyprus

### Level of NGO satisfaction with consultation processes on NAP(s)

“The Government does consult with NGOs and women’s organisations on policies relating to violence against women, although such consultation is often superficial and does not always result in real policy impact. For example, the selection procedures for including NGOs in various consultations is not always transparent, nor is it clear to what extent NGOs have a real voice and impact on policy making.

NGOs are involved in the Advisory Committee for the Prevention and Combating of Violence in the Family, the Multi-disciplinary Group on Combating Trafficking in Persons, and the National Machinery for Women’s Rights. In this way, women’s organisations and NGOs have an advisory role and are directly consulted in, for example, the drafting of National Action Plans.

The involvement of women’s organisations and NGOs is foreseen in both the NAP on Combating Trafficking and the NAP on Equality between Women and Men. Unfortunately, however, they are completely absent from the actions foreseen in the NAP for the Prevention and Combating of Violence in the Family. Also, in many cases there is an issue of where the line is drawn between civil society and the state. Questions arise such as who are women’s organisations accountable to, and how NGOs position themselves vis-à-vis the government.”

### NGO assessment of the implementation of the NAP(s)

The Advisory Committee for the Prevention and Combating of Violence in the Family is both the implementing body and monitoring mechanism of the NAP on Violence in the Family. The National Machinery for Women’s Rights within the Ministry of Justice monitors the implementation of the NAP on Equality between Men and Women together with the House Committee for Equal Opportunities between Men and Women. No specific budgets or timelines have been specified for all actions.



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# Czech Republic

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

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### National Action Plan(s) on violence against women

National Action Plan on the Prevention of Domestic Violence (2010-2014)  
→ gender blind, prefers gender neutral term „domestic violence“, no mention on violence against women

National Action Plan on trafficking in human beings (2008-2011)  
→ gender blind

### Level of NGO satisfaction with consultation processes on NAP(s)

“The situation is improving (in comparison to the 1990s): some NGOs are now members of the Committee for Equal Opportunities for Women and Men and the Committee for the Prevention of Domestic Violence. However, NGOs working on gender issues are still fighting to be recognised as respected partners and it is becoming more difficult to find money for services. State institutions made a lot of positive changes because of the pressure from NGOs and European institutions, but still they try to find a gender neutral way to deal with different forms of violence against women (including domestic violence, trafficking in women, etc.)”

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### NGO assessment of the implementation of the NAP(s)

There is no ring-fenced budget allocation for the fight against violence against women in State or municipal budgets, including for the expenses for the support of NGOs. NGOs usually apply to different programs opened by ministries (such as the Social Work, Health, and Interior Ministries), but with new standards on social services it is sometimes even more difficult to secure funding (e.g. for shelters at a secret address).

With regards to the financial crisis, the cuts are now more extensive and a gap in the system of providing direct help to victims of violence (such as counselling and shelters) could appear soon. A lot of direct support work is being done by NGOs, and in the face of such large financial cuts many will be unable to survive.

## NATIONAL ANALYSIS

# Denmark

NAPs	NGO consultation
	X
X	

Expert to the EWL Observatory on Violence against Women:

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### Expert's general analysis:

In the period 2001-2008, violence against women was considered a new field of action, where it was important to create fundamental changes, new structures and obtain new experiences. Today, after 8-10 years of action planning, violence against women at last is recognised as a permanent area of effort and the term 'strategy' has become considered to be more appropriate. There was a big debate around the suggestion to change the title of the strategy 'men's domestic violence against women and children' into 'violence in intimate relationships'; the Danish Women's Council was against this change of title, and called attention to the fact that it might lead a neglect of the gender perspective regarding men's violence against women. The new strategy is now more gender neutral in its terminology; in the text it frequently mentions 'women, men and children, who are victims', and it stresses that part of the mission of the strategy is to combat all kinds of partner violence. However, the Danish government also passed a law on women's shelters, which goes some way towards making the overall Danish national strategy more gender sensitive. Communication between NGOs and the Danish Minister of Equality is good. As NGOs, we feel that the ministry is listening to us and even seeking our expert opinion.

### National Action Plan(s) on violence against women

National Strategy to Combat Violence in Intimate Relations (2010-2012)

→ gender blind (the strategy is aimed at all forms of partner violence and also the effects of partner violence on children)

National Action Plan to Combat Trafficking in Human Beings (2007-2010)

→ gender blind

National Action Plan on Forced Marriage (2003-2005)

→ under political debate

National Action Plan against sexual child abuse (2003)

→ under revision, gender blind



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## NATIONAL ANALYSIS

# Denmark

### Level of NGO satisfaction with consultation processes on NAP(s)

“The National Observatory on Violence against Women under the National Women’s Council as well as relevant NGOs were called for a workshop in 2008 to discuss the targets and possible initiatives to be included in the Strategy 2009-2012.

We have had regular smaller meetings with the responsible civil servant in the Ministry of Gender Equity concerning different issues, among these

sexual assaults (the provision of rape crisis centres); budget for updating the database on violence against women; perpetrator programs; and medical services for the victims of violence.

Being relatively closely related to the departmental work, we have fairly good opportunities to be heard.”

### NGO assessment of the implementation of the NAP(s)

The various NAPs do not include specific budgets. The NAP to Combat Violence in Intimate Relations includes detailed provisions on the monitoring mechanisms (timeframe, research, involvement of NGOs, etc.). The Danish Minister of Equality is responsible for the National Strategy to Combat Violence in Intimate Relationships. She is also responsible for the Government’s Action Plan for Equality.

The strategy contains 30 different initiatives based on a total budget of 35 million DKK/ 4,7 million Euros. Some initiatives are continued from the former two action plans, such as a national hotline for women victims of violence and the treatment of violent men. There are also some new initiatives, such as a survey on domestic violence against men.



## NATIONAL ANALYSIS

# Estonia

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

Eha REITELMAN  
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### National Action Plan(s) on violence against women

National Action Plan on Reducing Violence (2010-2014)  
→ gender blind (domestic violence and trafficking in human beings only)

### Level of NGO satisfaction with consultation processes on NAP(s)

“The NGOs were in the preparation phase involved in the consultation process, but their opinions were actually not welcomed and their involvement was merely token. The opinions of NGOs and other ministries (Ministry of Social Affairs, Ministry of Foreign Affairs) were ignored, although their proposals were based on surveys and documents produced by international organisations and the EU institutions. The Action Plan was drawn up based mainly on the knowledge and opinion of the Ministry of Justice.

In terms of legal aspects, the Action Plan incorporates our proposal to analyse the possibilities for restricting the custody of abusive parents; we are, however, concerned since this is done by the Ministry of Justice. Our proposal to ban the buying of sex as one of the most secure methods of preventing human trafficking was not incorporated into the Action Plan; this was not even discussed.”

### NGO assessment of the implementation of the NAP(s)

The NAP foresees a budget, its implementation by all ministries, and an annual report of the Ministry of Justice, based on input by other ministries and an informal network of NGOs. The head of the department at the Ministry of Justice, who was responsible for drawing up the National Action Plan, has responded negatively to the gender perspective. We suggested incorporating the gender perspective in the Action Plan, but the answer was that this topic is being dealt by the Ministry of Social Affairs and it is not their concern. Rein Lang, the Minister of Justice, said that “if we start developing some action plans which target only the representatives of one sex, it might very well lead to the situation where we discriminate against the other sex.”

Thanks to the Ministry of Social Affairs, the funding for women’s shelters as well as supplementing basic training programmes for professionals on the topic of violence against women – which were our concrete proposals - were incorporated in the implementation section of the Action Plan; funding for them, however, is not fully guaranteed.

## NATIONAL ANALYSIS

# Finland

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

Tanja NOPENEN  
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### Expert's general analysis:

In general we are satisfied with the Action Plan to reduce violence against women (2010-2015) and the consultation process. However there are some issues that remain problematic. First, we think that there is not enough coordination between different NAPs and we demand more human resources for coordination, including a special unit. Second, in the NAPs the municipalities are on many occasions mentioned as the service providers. In Finland municipalities are highly independent and can decide themselves whether or not to provide special services for victims of violence. We think that some level of state funding and legislation would be appropriate. Third, the prevention of prostitution is not mentioned in any of these NAPs.

### National Action Plan(s) on violence against women

Action plan to reduce violence against women (2010-2015)

→ required by the Government Action Plan for Gender Equality (2008-2011), gender perspective, but does not include prostitution

National Action Plan on human trafficking (2008)

→ gender blind

National Action Plan on Internal security programme 2008-2011 (measures to reduce violence)

→ gender blind

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## NATIONAL ANALYSIS

# Finland

### Level of NGO satisfaction with consultation processes on NAP(s)

“There is no formal consultation processes. It is a custom that hearings are held when action plans / programmes are in course of preparation. When the new action plan was developed, there were thematic workshops where different actors were invited, including representatives from NGOs.

The officials who did the actual preparation work are experts on violence against women and have been easy to contact. The problem is the lack of political will. There are discussions and possibilities to address problems but difficulties to get political back up and funding for new services, etc. “

### NGO assessment of the implementation of the NAP(s)

We are satisfied with the content of NAP. It is based on international treaties and commitments such as CEDAW, Council of Europe Rec (2002)5 and the Beijing Declaration and Platform for Action. We are however very concerned about the implementation. There is no specific budget for implementation and it is stated within the NAP that some of the proposed measures can be carried out without separate funding. The opening seminar was held on September 30th, 2010. We have parliamentary elections in spring 2011 and we hope that the funding of NAP will become a focal issue when the new government is negotiating its programme.

The other two measures of the Government's Action Plan for gender Equality (2008-2011) regarding violence against women are so general that they are difficult to follow up: making sure that there are enough expertise on violence against women in each relevant ministry and strengthening the coordination and resources on preventing violence in intimate relationships and family.



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## NATIONAL ANALYSIS

### France

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

Michèle VIANES  
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#### National Action Plan(s) on violence against women

Plan to combat violence against women (2008-2010)  
→ all forms of violence against women except prostitution, gender perspective

#### Level of NGO satisfaction with consultation processes on NAP(s)

“We have asked for human and financial resources to implement the policies presented by the government, as well as the concrete implementation of the legal acts. In 2010 the issue of violence against women was designated as a ‘Great national cause’ but there was no budget and women’s NGOs face budget restrictions in general.”

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#### NGO assessment of the implementation of the NAP(s)

There is no ring-fences budget as many ministry and local bodies are involved. The concrete implementation is weak, there is a lack of counselling services and shelters, especially in rural areas, and there are discrepancies in court cases, etc.

There is no ministry or State Secretary dedicated to women’s rights.

## NATIONAL ANALYSIS

# Germany

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

Katja GRIEGER  
griegerpacvaw@web.de

### Expert's general analysis:

The German NAP includes reasonable and right aims. Regrettably the Federal Government is not able to achieve these aims without the contribution of all Federal States (Länder). Indeed, due to German federalism, a NAP never can provide a comprehensive strategy that will be implemented in the whole country; a lot of necessary measures cannot be implemented by the Federal Government which wrote the NAP. As a consequence the Federal Government states in the NAP: 'In adopting this Action Plan the Federal Government also expects that the Länder (Federal States) will further develop their programmes to combat violence against women. This is of great importance because many of the necessary measures are the sole responsibility of the Länder' (page 15). This is one of our biggest problems, and as a result the prospects of women seeking help are very different from one Federal State to another.

### National Action Plan(s) on violence against women

#### Second National Action Plan to Combat Violence against Women (2007)

→gender perspective; There is no concrete definition of violence against women and the NAP is not based on an explicit feminist analysis of society, but a lot of measures included in the NAP are based on such a comprehension and aim to increase gender equality.

#### National Integration Plan

→ addresses forced marriage



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## NATIONAL ANALYSIS

# Germany

### Level of NGO satisfaction with consultation processes on NAP(s)

“There is a consultation process between NGOs and the Federal Government within two federal working groups.”

### NGO assessment of the implementation of the NAP(s)

The Federal Government has provided two NAPs, the first in 1999, and the second in 2007. Every federal state (there are 16 in Germany) subsequently developed its own Action Plan on violence against women, but the Federal Government cannot oblige federal states to provide for funding to support and counselling services. Most federal states do not allocate an adequate budget for women’s support, e.g. for the costs of interpreters or for migrant women to access services without barriers. The realisation and quality of the measures also depends on decisions taken by the respective ministry in every single case.

One strong point of the second NAP is that it is based on the results of research studies, first of all on the results of the prevalence research “Health, Well-Being and Personal Safety of Women in Germany. A Representative Study of Violence against Women in Germany” (2004). The main focus points of the NAP are migrant women, women with disabilities, the vulnerability of women who are in the process of separation, the activation of the health care system to protect women and better access to service providers.

To monitor the NAP there are two federal working groups of interdisciplinary cooperation, one on the topic of domestic violence and another on trafficking, which are lead-managed by the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth.



## NATIONAL ANALYSIS

### Greece

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

Mika IOANNIDOU  
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### Expert's general analysis:

Although there is a NAP both on all forms of violence against women and on gender equality, the ongoing problem still remains: there is a big deficit in practical measures and the financing not only of the existing structures but also of those included within the new NAP on violence against women. The economic crisis in Greece affects mainly women and girls and also has a strong impact leading to an increase in male violence. The current situation is getting worse and the delay of financial support and the lack of legislative measures against the buyers of sex create new problems. The Greek Government has been urgently asked to proceed in new administrative and legislative measures, as the problem of trafficking affects especially migrant women entering illegally the country.

#### National Action Plan(s) on violence against women

National Action Plan on violence against women (2009-2013)

→ all forms of violence against women except prostitution, gender perspective

National Policy Priorities and Axes of Action for Gender Equality (2004-2008)

→ all forms of violence against women, gender perspective, but mainly domestic violence and trafficking

National Strategy Plan for Development (2007-2013)

→ mainly domestic violence, but gender blind

#### Level of NGO satisfaction with consultation processes on NAP(s)

“The consultation is not very satisfactory in our opinion. For example, the Greek Coordination of EWL was very invited very late on, when the legal text on domestic violence was about to pass through the Greek Parliament. The same problem appears with consultations with the public authorities on new measures or financing the actions against violence.”

### NGO assessment of the implementation of the NAP(s)

The General Secretariat is generally both the implementing body and the monitoring mechanism. The great delay of any finance and the lack of consultation still remain a problem. There is not sufficient support for victims of violence.

## NATIONAL ANALYSIS

# Hungary

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

Julia SPRONZ  
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### National Action Plan(s) on violence against women

National Strategy against Human Trafficking (2008-2012)  
→ gender blind

National Strategy of Social Crime Prevention  
→ resolution 115/2003 on battering, but gender blind

National Strategy for the Advancement of Gender Equality (2010-2021)  
→ section on violence against women. First Action Plan (2010-2011) of the strategy

National Strategy for the Prevention and Effective Handling of Domestic Violence (2003)  
→ not implemented, gender blind

### Level of NGO satisfaction with consultation processes on NAP(s)

“Cooperation and the relationship between NGOs and the government are not legally addressed; and in practice they is uncertain, depending on the individual relationships established.

While the relationship with certain departments is satisfactory (e.g. Ministry of Social and Labour Affairs), it is extremely hostile with others (Ministry of Justice and Law Enforcement). Women’s rights NGOs do not play real roles in the preparation of legislation: their proposals and recommendations are not taken into account, or consultative processes are merely only formal, short meetings. These meetings are mainly for the public eye, often followed by press conferences, and are not aimed at achieving substantive approximations of the various viewpoints. A good example is the elaboration of the latest strategy on the promotion of gender equality.

A positive fact to mention is that NGO experts were asked to write the draft. However, in case of violence against women the proposed draft has been significantly cut down by the government.”

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## NATIONAL ANALYSIS

# Hungary

### NGO assessment of the implementation of the NAP(s)

For the National Strategy on trafficking, the Ministry of Justice was charged as the national coordinator and created a coordinating body, which gathers ministries and four NGOs, none of them being a women's NGO. No budget has been allocated and the monitoring mechanism has not yet been developed.

The implementation of the National Strategy for the Advancement of Gender Equality was highly questionable for the fact that the resolution was adopted three months before the elections in 2010, with a highly probable government change. The strategy is placed only in a governmental resolution and not on parliamentary level. There is no separate budget for the implementation of the Strategy; instead the Action Plan suggests separating certain amounts from the already approved budgets of the various departments' chapters. The resolutions on the strategy and its first Action Plan remained in force after the change of government in 2010. However, women's rights NGOs have not been consulted and they have no information on the progress of the implementation of the documents' measures, or if any progress at all have been made.



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## NATIONAL ANALYSIS

# Iceland

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

Gudrun JONSDOTTIR  
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### Expert's general analysis:

A new NAP for the next four years is in the making. It does not include all forms of violence. The NGO Stigamot was invited to take part in the NAP working group. We also took part in writing the NAP against trafficking, we take part in the Specialist and coordination team on trafficking and Stigamot is represented in the Council of Equal rights. In Iceland the women's movement has united through the umbrella organisation Skottunarnar. Our most proud moment so far was the Women's strike in October 2010, with 50.000 women taking part in the demonstration out of a population of 330,000 inhabitants. Icelandic women are well aware of the links between male violence and gender equality, therefore they stopped working when they had earned their salaries at 14h08, instead of 17h00, because they have only 66.5% of men's salaries.

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At the same time the headlines were on sexual violence. The legislation on violence has improved rapidly. The purchase of the services of women in prostitution has been criminalised and the strip clubs in Iceland have been closed down. At the same time the Justice system does not work well in the field of male violence, which is of great concern. In 2011 we will open a shelter for women exiting prostitution and trafficking. We collected money across the country to be able to open the Shelter and sold so-called "Gender glasses". The Prime Minister bought a pair for every minister in her government and urged the ministers to wear the glasses every day at work.

#### National Action Plan(s) on violence against women

Plan of Action to Deal with Domestic and Sexual Violence (2006-2011)  
→ gender perspective but not all forms of violence against women

Plan of Action on Trafficking (2009)  
→ gender perspective

#### Level of NGO satisfaction with consultation processes on NAP(s)

"NGOs are involved in the team of experts coordinating the work on trafficking."

#### NGO assessment of the implementation of the NAP(s)

No or very low budget for the plans, and no or unclear monitoring mechanism.

## NATIONAL ANALYSIS

### Ireland

NAPs	NGO consultation
	X
X	

Expert to the EWL Observatory on Violence against Women:

The National Women's Council of Ireland  
info@nwci.ie

#### National Action Plan(s) on violence against women

National Strategy on Domestic, Sexual and Gender-based Violence (2010-2014)

→ gender blind; While recognizing that more women than men are affected, the definition of domestic violence does not reflect a gender perspective and does not link violence against women and inequality.

National Development Plan (2007-2013)

→ includes domestic violence, but gender blind

National Action Plan to Prevent and Combat Trafficking in Human Beings (2009-2012)

→ gender blind, no reference to prostitution

HSE Policy on Domestic, Sexual and Gender-based Violence (2010)

→ gender blind; While recognizing that more women than men are affected, the definition of domestic violence does not reflect a gender perspective and does not link violence against women and inequality.

National Action Plan on FGM (2008)

→ gender perspective

#### Expert's general analysis:

While some progress has occurred, the lack of a gendered framework is of great concern. Moreover, the recession has impacted very severely on Ireland and there is a need to identify, protect and ring-fence budget lines to implement the plans in a realistic time frame. NGOs need to have a bigger role in policy development, as they are at the forefront of addressing violence against women.

#### Level of NGO satisfaction with consultation processes on NAP(s)

"NGOs get an open invitation to feed in and to attend workshops on the National Strategy. Some NGOs were also asked for feedback on the HSE Policy.

NGOs are also invited to consultations on the NAP on human trafficking, but having an impact proves to be difficult."

#### NGO assessment of the implementation of the NAP(s)

Budgets are not specified. The National Steering Committee on Violence Against Women has an advisory role on the National Strategy on Domestic, Sexual and Gender-based Violence. Monitoring system is not independent.

## NATIONAL ANALYSIS

### Italy

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

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### Expert's general analysis:

Facts and figures about male violence against women in Italy are very concerning but there is still no data collection on gender-based crimes or violent acts. NGOs witness a great backlash in the way the women's body is portrayed and talked about in the media and in politics (due to scandals). All this is a clear symptom of the complete lack of political will to address violence against women and the imbalanced power relationships between women and men in our society. The new NAP (published November 2010) does not outline financial resources for the actions stated.

#### National Action Plan(s) on violence against women

National Action Plan Anti-Violence (Nov. 2010)  
 → gender blind, does not address all forms of violence against women

#### Level of NGO satisfaction with consultation processes on NAP(s)

"The national antiviolence network DI.R.E., an umbrella organization gathering more than 50 antiviolence women associations and shelters, were been invited to the International Conference on Violence Against Women organized by the Minister of Equal Opportunities within the Italian session of the G8 (September 2009). This fact is useful to understand the relationship between women NGOs and government. Moreover, a lot of 'red light scandals' concerning the Prime Minister and other members of the National and Local governments make it difficult to establish a good dialogue in terms of women's dignity, or respect for women."

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### NGO assessment of the implementation of the NAP(s)

Unfortunately we haven't got a NAP, although it has been promised several times by Government. Regarding the legislation against violence against women, there is the ordine d'allontanamento (2002), a sort of banning order that is a penal sanction that prevents to the violent person from going near his wife/partner, his children, their home and their places of work and study. Since 2009 we have had an anti-stalking law, which is totally gender blind. At local level, there are some interesting experiments, with Observatories and Work Tables being built between Law Enforcement, Social Services, Municipalities and Women Associations. Women NGOs involved in antiviolence actions (management of shelters and services, political actions and so on) are very active at the national level, but they aren't appropriately recognised. Services are founded by State and municipalities, but it is very difficult without resources to try to start up a real coordination. No ministry or State Secretary dedicated to women's rights.

## NATIONAL ANALYSIS

### Latvia

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

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#### National Action Plan(s) on violence against women

Action Plan to implement State Family Policy (2004-2013)  
→ gender blind

State Programme for the elimination of domestic violence (2008-2011)  
→ gender blind

National Program to Combat Human Trafficking (2009-2013)  
→ gender blind

Programme on Promotion of Gender Equality (2007-2010)  
→ gender blind

#### Level of NGO satisfaction with consultation processes on NAP(s)

“Consultations between government and NGOs pass, but unfortunately there are consultations on some specific aspects of family or domestic violence, and not on the broader issue of violence against women. There are invitations to discuss trafficking issues once or twice every year from the Ministry of Interior. However, this it is more like a show of cooperation but not a real cooperation whereby our point is taken into account in a practical way. Latvia still does not have systemic approach to eliminating violence against women and it does not see many forms of violence against women as violence against women.”

#### NGO assessment of the implementation of the NAP(s)

Budgets are specified; ministries are the implementing bodies and have to produce annual reports.



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## NATIONAL ANALYSIS

# Lithuania

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

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### National Action Plan(s) on violence against women

Second National Action Plan for the Elimination of Violence against Women (2010-2012)  
→ on domestic violence, gender perspective

National Program on Trafficking in Human Beings (2009-2012)  
→ gender blind

National Programme on Equal Opportunities for Women and Men (2010-2013)  
→ not all forms of violence against women

### Level of NGO satisfaction with consultation processes on NAP(s)

“The Ministry of Social Security and Labour organises round-table discussions with women’s NGOs on each draft of National Action Plans for the Elimination of Violence against Women. There were periodical meetings with NGOs under the National Action Plan for the Elimination of Violence against Women 2007-2009 and under the National Action Plan for 2010 – 2013. The Ministry of Social Security and Labour also organised a discussion with NGOs on a draft National Law against violence in the private sphere. NGOs were invited to submit their proposals until February 2010. Four representatives of NGOs are among members of the Commission on Equal Opportunities for women and men.”

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### NGO assessment of the implementation of the NAP(s)

Budgets are allocated, all ministries are involved, and the Commission on Equal Opportunities for women and men is the main monitoring mechanism.

The Second National Action Plan for the Elimination of Violence against Women is confirmed, but the budgets that were set out were not provided to some of the planned activities (for example the survey on the costs of violence).

National Program on Trafficking in Human Beings is confirmed, but in our opinion it is not functional. National Programme on Equal Opportunities for Women and Men is confirmed, but in 2010 no activities were implemented because the budgets that were set out were not provided.

## NATIONAL ANALYSIS

# Luxembourg

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

Joëlle SCHRANCK  
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### Expert's general analysis:

In Luxembourg, we see with concern that the fight against violence against women fits into the scheme of a policy of 'equal opportunities' between women and men, instead of an 'equal rights' perspective.

The Ministry for Women's Rights was replaced by the Ministry for Equal Opportunities in 2004, and the new minister (nominated in 2009) promotes her policies within this broader scheme of equal opportunities. While analysing the 2011 budget of this ministry, we notice that the budget line dedicated to the campaigns against all forms of violence against women (120,000€ in 2009, 110,000€ in 2010) does not exist anymore. The ministry supports NGOs financially (e.g. to run conferences, training) on the condition that the target group includes both women and men.

The National Action Plan on Equality covers the 12 policy areas identified in the Beijing Platform for Action, and one of these is violence against women, trafficking and prostitution. The government is far from working on tackling prostitution, but 'will implement a scientific monitoring of the prostitution phenomenon in order to get more information on the evolution of the prostitution phenomenon at national and local level and will analyse alternatives to the Swedish model' (quote from the NAP).

### National Action Plan(s) on violence against women

National Action Plan on Equality between women and men (2009-2014)  
→ 12 policy areas, point 4 being on violence, trafficking and prostitution (therefore not all forms of violence against women), gender perspective



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## NATIONAL ANALYSIS

# Luxembourg

### Level of NGO satisfaction with consultation processes on NAP(s)

“Representatives of different institutions and governmental bodies, together with social partners and NGOs, were invited to a seminar to discuss the NAP. Collaboration between NGOs and public institutions (police, ministry, justice, etc.) is constructive and fruitful.”

### NGO assessment of the implementation of the NAP(s)

The Ministry for Equality is the coordinating body of national equality policy actions. The other ministerial departments are in charge of the implementation of the policy actions within their respective departments. The monitoring of their internal action plans is placed under the direction of gender units within each ministry. Each ministry is represented in the inter-ministerial Committee on Equality between women and men by a high-ranking officer who has decision-making powers.

The governmental programme foresees that the NAP will be scientifically monitored and evaluated at the end of 2013 by an external expert; this will allow the implementation of the different measures within the plan to be followed up.

By comparing the current and previous plan (2006-2008), we can say that the level of planned actions on the fight against violence against women has been reduced.



## NATIONAL ANALYSIS

### Malta

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

Marceline NAUDI  
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#### Expert's general analysis:

The Malta Confederation of Women's Organisations (MCWO), representing 14 women's organisations, has been invited to participate in projects but has not been consulted much on policies and programmes. Consultation process with MCWO is at an early stage so assessment is difficult. However, to date, when MCWO has been involved, the experience has been a positive one.

The current gender blind legislation on domestic violence should be reviewed to provide for all forms of violence against women.

#### National Action Plan(s) on violence against women

National Report on Strategies for Social protection and Social Inclusion (2008-2010)

National Action Plan on Domestic Violence (2008-2009)

- gender blind
- project 'Dignity for domestic violence survivors', gender blind

#### Level of NGO satisfaction with consultation processes on NAP(s)

"Government consults with its agencies and commissions. The Malta Confederation of Women's Organisations (MCWO), representing 14 women's organisations, has been invited to participate in projects but has not been consulted much on policies and programmes. Consultation process with MCWO is at an early stage so assessment is difficult. However, to date, when MCWO has been involved, the experience has been a positive one."

#### NGO assessment of the implementation of the NAP(s)

The Commission for Domestic Violence has been allocated a yearly budget, which is decreasing, to implement the NAP.



## NATIONAL ANALYSIS

# Poland

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

Gosia TARASIEWICZ  
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### National Action Plan(s) on violence against women

National Program on Counteraction of Violence in Family (2006-2016)  
→ gender blind

National Program of Counteraction of Human Trafficking (2009-2010)  
→ gender blind

### Level of NGO satisfaction with consultation processes on NAP(s)

“In general NGOs used to have a little influence over the creation and implementation of National Action Programs. There is a system of ‘subsidy contest’, which definitely ‘cuts off’ women organisations, especially feminist ones. However, there is hope that the introduction of NGOs to the working group of experts will improve the ability of civil society to influence the program. The risk is that experts who join the working group will come from organisations which do not work to a gender perspective. The

main problem for Polish NGOs is that there is no or very little support from the government. The government is not interested in social consultation, and very often ignores the knowledge and skills of NGO’s, especially feminist organisations. So there is definitely no improvement. NGO’s are getting even weaker due to the complicated procedure of getting funds from the state, as well as complicated procedures of accountancy and cost sharing.”

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### NGO assessment of the implementation of the NAP(s)

The National Program of Action related to the Act on Counteraction of Violence in Family is prepared by a working group of experts led by a National Coordinator. The Program is coordinated by the Ministry of Labor and Social Affairs. From now on, as a result of intervention by the Parliamentary Club of the Left party, it will consist of 10 experts from NGOs. The attempt to introduce five experts from women and feminist organisations was unsuccessful. In addition to that, in 2009 the Program targeted almost exclusively violence against children. This might lead to further ignorance of the gender aspect of domestic violence.

The Program of Counteraction of Human Trafficking in Poland is managed by the Ministry of Internal Affairs and Administration. One NGO is part of the consulting team of the Ministry. For the first time since 2005 there are some funds for those programs. These funds are insufficient considering the huge needs, but it is important to note that for the first time they are clearly allocated to the program.

There is still no Parliamentary Act on Equality and there is no single agency responsible for fighting discrimination against women and implementing women rights.

## NATIONAL ANALYSIS

# Portugal

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

Maria SHEARMAN DE MACEDO  
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### Expert's general analysis:

For the period of 2011-2013 the 'IV National Plan against Domestic Violence', the 'II National Plan against Trafficking in Human Beings' and the 'IV National Plan for Equality, Citizenship and Gender and non Discrimination' were launched. Their conception highlights a greater gender perspective on gender equality and gender violence. The existence of a wide range of measures within the NAPs allows for the implementation and monitoring of developments around women's human rights in Portugal. Nevertheless we continue to observe the inexistence of a specific annual budget for these measures, which in our perspective represents a lack of political commitment in these areas.

#### National Action Plan(s) on violence against women

Third National Plan against Domestic Violence (2007-2010) → gender blind

National Plan against Trafficking in Human Beings (2007-2010) → gender blind

Integration Plan for Immigrants → chapter on trafficking, gender blind

Third National Plan for Equality, Citizenship and Gender (2007-2010) → section on 'fighting against gender violence', but only some forms of violence against women are included and it is gender blind  
Action Programme for the Elimination of Female Genital Mutilation, integrated into the III National Plan Citizenship and Gender and presented at the International Day of Tolerance Zero to FGM in 2009

#### Level of NGO satisfaction with consultation processes on NAP(s)

"For the follow up of the National Plan against Domestic Violence (2007-2010) and the National Plan for Equality, Citizenship and Gender (2007-2010), working groups were constituted and the NGOs were invited to participate. There were some structural difficulties: these working groups were constituted of mainly representatives of public/governmental entities; there are few women NGOs in the Portuguese Civil Society; there is no systematic consultation of NGOs; NGOs are not recognized as experts; the working groups meet only 2-3 times a year; there is no budget affected; there is no integrated and coherent approach in the implementation of measures; there is no strategic and political framework, nor are priorities named.

There was a larger public consultation on the design of the NAPs that were launched to cover the subsequent 3 years."

#### NGO assessment of the implementation of the NAP(s)

The Plans do not have proper budget allocated. The Commission on Citizenship and Gender Equality coordinates and monitors the implementation of the plans, with annual progress reports submitted.

## NATIONAL ANALYSIS

# Romania

NAPs	NGO consultation
X	X

Expert to the EWL Observatory on Violence against Women:

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### Expert's general analysis:

In a country with more than 1.2 million women victims of male violence, and which has the highest rate of trafficking of women in Europe, Romania's government still use 'budgetary constraints' as reason for closing the main national agencies in charge of the protection of women at risk: the National Family protection Agency which was responsible for policies on domestic violence closed in 2009, and the National Equal Opportunities Agency, National Anti-Trafficking Agency and National Agency for Persons with Disabilities all closed in 2010. NGO consultation takes place only after the government is pressured. National Action Plans are not updated, and are often gender blind or nonexistent. The only NAP which is gender oriented and fully updated is on equal opportunities (2010-2012) – but it remains without a coordinating body.

### National Action Plan(s) on violence against women

National Strategy in the field of preventing and combating violence phenomenon (2005)  
→ not updated, gender blind

National Strategy for equality between women and men (2010-2012), with National Action Plan (2010-2012)  
→ updated, includes a gender perspective for the different provisions, but no provision on violence against women

National Action Plan (2008-2010) for the implementation of the national strategy against trafficking of persons (2006-2010)  
→ not updated, gender blind

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## NATIONAL ANALYSIS

# Romania

### Level of NGO satisfaction with consultation processes on NAP(s)

“Since 2008 no consultation activity has been initiated by the national Agency for Family Protection, although Equal Opportunity Commissions from the two Parliamentary Chambers have been more active in initiating a dialogue with NGOs related to the improvement of the legislative provisions regarding domestic violence. Public funds targeted at service

provision and shelters for domestic violence victims have been planned in a way in which only public institutions are able to apply, with no provision for staff salaries or overheads. These limitations have meant that NGOs have not been able to benefit from the offer of public funding for domestic violence services.”

### NGO assessment of the implementation of the NAP(s)

Since 2009 the National Authority for Family Protection and Children Rights has been the new implementation body for domestic violence measures, but it has no strategy or implementation action plan on preventing and combating domestic violence. The official monitoring mechanism according to the Romanian legislation is Social Inspections, but these are only for service provision. A Social Observatory has also been planned, but it is not currently established. There are no resources in place for consistent NGO monitoring of governmental action, and the current situation is that many NGOs have to close their doors for service provision and limit their advocacy or campaigning work.

Other National Action Plans currently in operation in Romania are not updated, including those regarding trafficking of women and other related fields. Local public administrators, with very few exceptions, have no budgetary provisions for supporting local action plans and implementing strategies in the field. The only updated strategy and action plans in place are those in the field of equal opportunities for women and men (2010-2012), but ANES (National Agency for Equal Opportunities), even after NGO and public protests, was closed in July 2010.



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## NATIONAL ANALYSIS

# Serbia

NAPs	NGO consultation
X	X

### Expert's general analysis:

Serbia has about 80 strategies covering different aspects of life and only one directly addresses gender equality, including all forms of violence against women. Generally the problem is political will to end violence against women; instead we note project driven activities by ministries and government institutions. This policy results in a lack of implementation, monitoring and budgets, or a lack of information and reporting on NAP creations or implementation. As for the content of NAPs, the situation varies. The two national and one regional NAP that was drafted by feminist experts are very good on all levels, but the rest are less good. This particularly includes the NAP on trafficking in people, which is not gender sensitive. We therefore have both NAPs on specific forms of violence against women which include a gender perspective, as well as NAPs on all forms of violence against women or on gender equality in general (incl. violence against women), but which are gender blind. The process of involving of women's organisations started in 2006 when the first NAP on the advancement of the position of women was drafted, when 33 women's organisation were involved. Furthermore, during the drafting process of the National Strategy for Combating Domestic Violence, women's organisations clearly stated that the process and outcome of the first draft was not at all satisfactory. This was completely taken in account, and experts from women's organisations were then engaged to continue finishing the draft.

Expert to the EWL Observatory on Violence against Women:

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### National Action Plan(s) on violence against women

National Strategy for Improving the Position of Women and Promotion of Gender Equality (2008-2014) → not all forms of violence against women included, gender perspective

Action Plan for Implementation of the National Strategy for Improving the Position of Women and Promotion of Gender Equality (2010-2014) → not all forms of violence against women included, gender perspective

National Action Plan for Combating Human Trafficking (2009) → gender blind

Strategy for Improving the Position of Individuals with Disabilities (2006) → no action plan, violence against women

Social Welfare Development Strategy (2005) → gender blind

#### UN PROJECTS:

National Millennium Developments Goals of the Republic of Serbia (2007-2015) → violence in family

Combating Sexual and Gender-based Violence - Project in collaboration with UNDP (2009-2011) → gender perspective

#### REGIONAL PLAN:

Strategy for Protection from Domestic Violence and other Forms of Gender-based Violence in the Autonomous Province of Vojvodina (2008-2012) → all forms of violence against women, gender perspective

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## NATIONAL ANALYSIS

# Serbia

### Level of NGO satisfaction with consultation processes on NAP(s)

“In 2010 the process of creating the Draft National Strategy for Combating Domestic Violence started, but the Gender Equality Directorate’s inclusion of women’s organisations was inadequate. The first Draft outcome was not at all satisfactory to women’s specialist organisations: it did not correspond with the strategic goals of the overarching document, the ‘National Strategy for Improving the Position of Women and Promotion of Gender Equality’, nor the important international documents concerning the protection of women against violence.

The network Women Against Violence, made up of Serbia Women’s NGOs, has expressed dissatisfaction with the consultation process many times. For example, 44 women’s NGOs signed a letter to the Gender Equality Directorate, in which they protested against marginalisation of the women’s NGO sector in the consultation process for the drafting the National Strategy. Subsequently, a Working Group to draft the new version of the Strategy was created, in which women’s NGOs actively participated. Due to

the engagement of women’s NGOs, the current Draft covers other forms of violence against women (not only domestic violence) and it demands significant changes in legislation and policy. However the new Draft, entitled National Strategy for Preventing and Suppressing Violence against Women and Domestic Violence, has not yet been adopted by the Government and it is not clear whether all of the demanded changes will be accepted by responsible ministries.

Regarding the Strategy for Improving the Position of Individuals with Disabilities, women from the civil sector were included in the process. One of the leaders in the field of women with disabilities is a member of the parliament, and is active in the creation of documents concerning people with disabilities. The Roma Women’s Network lobbied for the Action Plan for Women to be part of the National Strategy to Improve the situation of Roma people, 2010.”

### NGO assessment of the implementation of the NAP(s)

Budgets are not specified within the various NAPs, with the exception of projects in collaboration with the UNDP; implementation bodies are not clearly designated, and monitoring mechanisms are not working well (for example, the Commission for the Person with Disabilities has not been formed).

Vojvodina, the provincial Secretariat for Labour, Employment and Gender Equality, submits regular reports to the UN Trust Fund in Support of Actions to Eliminate Violence Against Women, and annual external evaluation and regular monitoring take place. This comprehensive policy document is based on a broad, gender-sensitive analysis of institutional policies and practices.



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## NATIONAL ANALYSIS

# Slovakia

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

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### National Action Plan(s) on violence against women

National Action Plan for the prevention and elimination of violence against women (2009-2012)  
→ gender blind

National Action Plan on trafficking in human beings (2008-2010)  
→ gender blind

National Action Plan for gender equality (2010-2013)  
→ nothing on violence against women, gender blind

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### Level of NGO satisfaction with consultation processes on NAP(s)

“NGOs had the possibility to send documents and proposals in the preparation of the NAP on violence against women, but the majority of their proposals do not appear in the final document. Two Councils are in charge of drafting the document, but NGOs have been warning for a long time that these are merely formally created structures which lack any real provision for NGOs to influence the results of decision-making processes. These bodies sometimes meet only two or three times per year and serve mainly to formalise documents drawn up by state institutions. NGOs had to go through a public

statement strategy to get two of their comments adopted (a major effort concerned the inclusion of the UN definition of violence against women). NGOs were left out of the strategy as agencies which could provide services to women which would allow the strategy to be fulfilled. Moreover the NAP does not mention the support (financial, institutional, etc.) for NGOs that have long-term experience and expert knowledge of violence against women, which does not contribute to building a positive picture of democratic and partner cooperation between state institutions and NGOs.”

### NGO assessment of the implementation of the NAP(s)

The budget is not allocated or specified exactly, and the amount available for NAP implementation is not determined. The Ministry states only that individual tasks will be fulfilled within the budgets of individual ministries or from the budgets of self-governing regions, without specifying the amounts that will be dedicated to the fulfilment of the individual tasks. There is no independent monitoring mechanism or monitoring system. A report on implementation progress is produced and submitted to the Government by Ministry of Labour, Social Affairs and Family.

## NATIONAL ANALYSIS

# Slovenia

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

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### Expert's general analysis:

In general, progress in Slovenia has been made on a normative level in fields such as domestic violence, trafficking of human beings and the equality of women with men. Plans or strategies focusing on violence are gender blind, and do not deal with violence against women as structural issue or as an important matter that influences/ impedes women's access to employment, education and participation in public and political life. Plans or strategies do not tackle the need to strengthen social and economic, the reproductive and sexual rights of women, the right to affordable housing, etc. The biggest problem, however, is that the implementation of nearly all of the plans or strategies is weak. Local communities have not created good conditions for the development of independent NGOs that are able to offer specialised, gender-specific services, and which take an individualised approach to the treatment and empowerment of victims - with the exception of some bigger municipalities as Ljubljana and Celje.

#### National Action Plan(s) on violence against women

Periodic Plan for the implementation of the Resolution on National Program for equal opportunities of women and men (2010-2011)  
→ specific forms of violence, but gender blind

Resolution on National Program for the Prevention of Domestic Violence (2009-2014)  
→ gender blind

Action Plan of the Slovenian working group against trafficking in human beings (2010-2011)  
→ gender blind

#### Level of NGO satisfaction with consultation processes on NAP(s)

"We often still have to remind policy makers and policy officials that we should be and want to be consulted on important documents or on documents that influence our work and/or victims of violence. That is still not an established practice for all policy makers and policy officials. Individual bureaucrats who make personal choices on whether or not to consult NGOs are still the norm."

#### NGO assessment of the implementation of the NAP(s)

Progress has been made on a normative level in the sense that documents that focus on violence have been passed. However these documents are mainly gender blind, and if they speak about violence against women in the frame of gender equality they still 'soften' the language with gender neutral terms as trafficking in human beings (instead of 'trafficking in women'), domestic violence (instead of 'violence against women in the family'), etc. At the moment the implementation of all the documents is weak, which is the biggest problem in the field.

## NATIONAL ANALYSIS

### Spain

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

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#### Expert's general analysis:

The recent demise of the Ministry of Equality which was closed for budgetary reasons, and the transfer of its powers to the Health Ministry are very worrying for women's NGOs. The Ministry has been renamed as the Ministry of Health, Social Policy and Equality, and the former Minister for Equality is now Secretary of State in charge of Equality. NGOs have criticised the government's decision, which is seen as a devaluation of equality policies, and its dilution into broader social and health policies. The policy concerning gender based violence still applies, but it does not include the need to train legal operators in order to apply the Integral Law.

#### National Action Plan(s) on violence against women

Strategic Plan for Equal Opportunities (2008-2011)  
→ includes gender-based violence, gender perspective

Integral Plan on the fight against trafficking in human beings for sexual exploitation (2009-2012)  
→ gender perspective

Awareness and Prevention Plan for Gender-based Violence (2010) → gender perspective

Attention and Prevention Plan for Gender-based Violence in the Population of Foreign Immigrants (2009-2012)  
→ gender perspective

#### Level of NGO satisfaction with consultation processes on NAP(s)

"There is a fluid relationship between the Government (The Secretary of State and the Branch of Government Against Gender-based Violence) and women's NGOs. The communication process between NGOs and the Secretary of State is suitable. We are able to make our claims and demands around issues of violence in general, and the official bodies receive our claims. Nevertheless, there are still unresolved problems with the implementation and enforcement of the Integral Law. As a result of these problems many parts of the law have not been fully developed, which creates an obstacle in making the Law as strong as it could be."

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#### NGO assessment of the implementation of the NAP(s)

The Ministry of Equality was the main implementing body and had a dedicated budget for each of the NAPs. The delegation of the government dealing with gender violence was created within the Ministry of Equality. Also, observatories and units were created within various ministries (Defence, Work and Social Services, Food and Health, Cooperation and External Affairs, Education and Science, Interior and Justice), including a State Observatory for Violence against women.

The Ministry of Equality and the Ministry of Work and Immigration created a Forum named CON FLUENCIA, which is made up of women's organisations and immigrant organisations belonging to the Forum for the Social Integration of Immigrants.

## NATIONAL ANALYSIS

# Sweden

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

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### Expert's general analysis:

Last year there was a lot of focus on male violence against women. Some of the big evening papers wrote articles on violence and on the number of women being killed by men they have or have had relations with. The police have been criticised for poorly investigating cases where women have accused men of violence or sexual abuse. The police have also been criticised for not being able to adequately evaluate the risks faced by women who report experiences of abuse, and some women have died as a result. We had an election in autumn 2010 and we haven't yet seen any activity from the Government concerning a new NAP for the coming years. We had an evaluation of the recent ban on the purchase of sexual services, which concluded that the law has been a success. There have been almost no discussions between the Government and the NGOs on violence against women. The shelters continue to do a great job but in some cases are struggling to survive because of the lack of funding, and women with disabilities are still not protected.

#### National Action Plan(s) on violence against women

Action Plan to combat male violence against women, violence in the name of honour and violence in same-sex relationships (2007-2010)  
→ gender perspective, all forms of violence against women

Action Plan for Trafficking and Prostitution (2008-2010)  
→ gender perspective

#### Level of NGO satisfaction with consultation processes on NAP(s)

"There has been almost no cooperation between the Government and NGOs. There was one hearing before the NAP on violence and some meetings with the Board of Social Welfare have taken place."



## NATIONAL ANALYSIS

# Sweden

### NGO assessment of the implementation of the NAP(s)

The Swedish Board on Crime Prevention has evaluated both NAPs and published reports. Implementing bodies include the Police, the National Board of Health and Welfare, County Administrative Boards. The budget is clearly defined and particularly targeted at education, the prevention of violence and the strengthening of shelter services. There has also been money designated for violence against women with disabilities and violence in same sex relations. In Sweden we have two shelter organisations that have helped and protected abused women for 30 years and they continue to do a fantastic job. They have also been at the forefront of feminism and been advocated for women's rights over the years. After the NAP was put in place extra money was budgeted for the protection of abused women, for which only the municipalities could apply. They did not have a good relationship with the existing shelters, and after being allocated funding they chose to work with other, less critical, NGOs who did not have any experience of working with abused women.

We have also seen that the Government wants to have more control over NGOs, including the shelter organisations, and so they are now evaluating the work of the shelters. The NAP did not include any discussion of male violence against women as a form of structural discrimination. The NAP mentions the special needs of women with disabilities, but nothing has really been done to address these needs. Women with disabilities are still finding it difficult to access shelters and almost no money has been distributed to make the shelters accessible and to make sure that the shelters are able to take on extra staff when needed. A lot of the information on violence and protection provided on Municipalities' websites is not accessible to women with disabilities. The Government is also currently evaluating our rape law. The Government recently dedicated 42 million Swedish Crowns to carrying out research on male violence against women.



## NATIONAL ANALYSIS

# Turkey

NAPs	NGO consultation
X	
	X

Expert to the EWL Observatory on Violence against Women:

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### Expert's general analysis:

Although political commitments to eliminate violence are being made in political debates, the discourse often stays as rhetoric. This is because resources to ensure the sustainability of such policies are not sufficient, and the budget allocated to public institutions to combat violence against women is far from adequate. This indicates an urgent need for political will to end violence against women. The independent women's movement continues to play pivotal role in combating violence against women. Women's rights organisations – especially feminist organisations – and various human rights organisations fight to eliminate such violence by developing policies and engaging in relevant activities. The women's movement in Turkey is both one of the significant elements of this struggle and one of the holders of vast experience and knowledge in the area. The fact that women's NGOs are still not allowed to act as intervening parties in cases of violence against women had led to sentence reductions or acts of violence going unpunished due to the prevailing discriminatory judiciary practices. Therefore improving the willingness of the government to strengthen cooperation with women's movement is an urgent necessity.

#### National Action Plan(s) on violence against women

National Action Plan on Combating Domestic Violence against Women (2007-2010)  
→ gender perspective

National Action Plan on Gender Equality (2008-2013) → gender mainstreaming

Prime Minister's Circular for the prevention of violence against women and children and of 'honour' killings (2006) → gender blind

National Action Plan on trafficking in human beings (2010) → gender blind

#### Level of NGO satisfaction with consultation processes on NAP(s)

"There is a Violence Against Women Observation Committee and a Consultation Committee for Women's Status, which are both coordinated by the General Directorate for the Status of Women. I would rate them as 'somewhat unsatisfactory' since they meet only sporadically, but the authorities are open to consultation when it is specifically sought out by relevant NGOs."

#### NGO assessment of the implementation of the NAP(s)

Budgets are not defined, various government bodies are in charge of the implementation of the NAPs, and the general Directorate for the Status of Women is the monitoring mechanism. A Parliamentary Commission of Equality between Men and Women was established in 2009, but without a budget allocated.

## NATIONAL ANALYSIS

# United Kingdom

NAPs	NGO consultation
	X
X	

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### Expert's general analysis:

Budgets are not defined, various government bodies are in charge of the implementation of the NAPs, and the general Directorate for the Status of Women is the monitoring mechanism. A Parliamentary Commission of Equality between Men and Women was established in 2009, but without a budget allocated.

### National Action Plan(s) on violence against women

There is no UK-wide strategy on any form of violence against women (national strategies covering different policy areas exist to some extent in all four countries of the UK, but no overarching coherent strategy exists). Policy based therefore in the 4 nations of the UK:

ENGLAND: 'Together we can end violence against women and girls: a Strategy' (2009)  
 → domestic violence and sexual violence, gender perspective, under political debate  
 Call to end violence against women and girls: Action Plan (2011)  
 → domestic violence and sexual violence, gender perspective

NORTHERN IRELAND: 'Tackling Violence at Home' (2005) is not a strategy  
 → gender blind

SCOTLAND: 'Shared Lives, Changed Lives' (2009) is a "framework" with no actions or funding attached  
 → covers all forms of violence against women, gender perspective

WALES:  
 Strategy on violence against women 'The right to be safe' (2010)  
 → covers all forms of violence against women except domestic violence, gender perspective  
 'Domestic Abuse: The All Wales National Strategy' (2005)  
 → gender blind



## NATIONAL ANALYSIS

# United Kingdom

### Level of NGO satisfaction with consultation processes on NAP(s)

The consultation on the previous England Strategy was good, but that strategy has since been replaced with one that next to no consultation has been held on. The primary structure for consultation, the Women's National Commission, was closed by the new government in December 2010, and no plan for systematic consultation with NGOs has yet been proposed.

The Welsh and the Northern Ireland consultations have been problematic, and the Welsh Assembly cut funding for the primary structure for consultation, the Wales Women's National Coalition, in 2010.

In Scotland, NGOs get good consultation for the most part but have no action plans to speak of other than one for Domestic Abuse and children.

### NGO assessment of the implementation of the NAP(s)

**ENGLAND:** The lack of budgetary commitments in the 2009 strategy was a weakness, and implementation rested on internal accountability mechanisms. The new government's decision to replace this strategy with its own is very concerning, given the wide consensus created for the 2009 strategy. Some support in the form of funding for domestic violence and sexual assault services has been announced, but the level is nowhere near adequate.

**NORTHERN IRELAND:** NGOs have concerns regarding funding and resource provision in the context of the overall strategic approach. Women's Aid is also concerned about the cost of access to justice in Northern Ireland and is working hard to urgently address this issue with Government.

**SCOTLAND:** There are strong links between the public sector duty on gender and violence against women, thanks to the Equalities and Human Rights Commission Scotland. The violence against women sector was protected at national level in funding cuts for 2010-11. Local funding decisions have been mixed, in part due to NGOs watching carefully to see that equality impact assessments are carried out on public spending.

**WALES:** The strategy on violence against women will be formally monitored and evaluated by the Women and Girls (WAG) Domestic Abuse Working Group, which includes many NGOs working in the sector. The Wales Violence Against Women Action Group (which includes some of the same people) will also monitor and evaluate it, and provide feedback to WAG in the form of a score-card. The published Implementation Plan does not have clearly noted dates, owners or outcomes. A weakness in the strategy is the absence of stronger prioritisation, guidance and scrutiny of local authority provision, a key element in the postcode lottery for services faced by women in Wales.



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## NATIONAL ANALYSIS

# Ukraine

NAPs	NGO consultation
	X
X	

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### National Action Plan(s) on violence against women

National Programme on ensuring gender equality in Ukrainian society (2006-2010)  
→ violence against women and men, gender blind

National Programme on Counteracting Human Trafficking (2007-2010)  
→ gender blind

### Level of NGO satisfaction with consultation processes on NAP(s)

“Consultation and cooperation between NGOs and governmental bodies exists on a national and regional level. There are consultations with NGOs in the process of developing National Programs, but not all NGO recommendations are taken into consideration and incorporated into the Programs. What is especially worrying is that crucial comments, such as the demand to replace ‘domestic violence’ with ‘violence against women and men’, have not been taken into account. In the regions where NGOs are active and professional, they are very much involved in the development and implementation of Regional Programs, and in implementing the national programs on gender equality and human trafficking. Cooperation between the police and NGOs around the implementation of law and policies on domestic

violence has been developed at the National\ Ministry level, and very well developed in some regions where women’s NGOs are active and willing to cooperate with police to improve their response to domestic violence. NGOs and police representatives participate in Advisory Boards, and have common meetings aimed at improving police responses and the protection of domestic violence victims’ rights. NGOs also carry out training for police officers on domestic violence and human trafficking, etc. Gender Adviser positions have been established in all Ministries and regional\local executive bodies, and in some bodies NGO representatives work very effectively with the Gender Advisors. However, consultation and cooperation still need to be improved and developed.”

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### NGO assessment of the implementation of the NAP(s)

There are no separate budgets allocated for the programmes. Ministries and other implementing bodies provide reports on the implementation of actions to the Ministry of Family, Youth and Sport. They often ask for information from NGOs, but NGOs do not have access to the final reports. The common practice is that governmental bodies include activities conducted by NGOs in the framework of their projects, and in the reports on the implementation of National programs. However, there is no monitoring mechanism in place, and no possibility for NGOs to monitor the effectiveness of program actions implemented by governmental bodies and NGOs.

## Credits:

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BAROMETER



EUROPEAN WOMEN'S  
LOBBY  
EUROPEEN DES FEMMES

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EUROPEAN WOMEN'S  
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