May 29, 2015

Re: WHO Global plan of action to strengthen the role of the health system within a national multi-sectoral response to address interpersonal violence, in particular against women and girls, and against children, building on existing relevant WHO work

First Discussion Paper containing Draft Zero (20 March 2015)

On behalf of the Kinsey Institute, please accept our comments on the Global Plan of Action on interpersonal violence. We thank you for the opportunity to participate in this important initiative to understand, address and prevent interpersonal violence.

General comments:
(1) Excellent first draft. Congratulations to all who prepared it. Overall, it appears comprehensive, accurate and sufficiently results-oriented.
(2) It would be helpful if the plan were more clear and consistent in identifying target populations. For example, in some cases, the document mentions elder abuse. In other cases, reference to elder abuse is completely missing. Other populations who are addressed either directly or indirectly, but inconsistently are LGBTI persons, migrants, and refugees. Given that UN human rights instruments and/or agencies have mandates to include these often disadvantaged populations, it would be optimal if this plan could be consistent with those mandates and inclusive of all relevant populations throughout the document on a par with health care provisions for addressing violence against women and children.
(3) Notable omissions include: There are no references to the various forms of culturally-created discrimination that perpetrates life-long hardship for female victims of sexual violence, particularly during armed conflict, and in cases where married women experience divorce or early death of a husband. Yet gender-based discrimination, exacerbates rather than relieves the original traumas of violence and/or loss through life-long social ostracism and shaming, perceived unworthiness for marriage and family life, and related economic hardship can lead to and perpetuate negative health consequences for women and their children.
(4) The document would be clearer if this glossary of terms in Annex 1 were relocated to the beginning, before the introduction. In that case, the document could refer to interpersonal violence rather than repeating the list of victims again and again.
(5) Pages 1-8. Overall what is missing in the Draft is a roadmap for how to begin the process; what kinds of assessment are needed to get started, to begin change, to continue it, and to measure it. Without specifying planned actions it will be seen as too big (and abstract) to tackle.

Specific Comments:
Page 1. Para. 4. “Interpersonal violence is preventable, and responsibility for addressing it rests clearly with national governments.” In theory, this comment may be true. In practice, however, so much interpersonal
violence is invisible or unreported that it is not accessible by governments for regulation. An additional sentence or two of explanation here giving examples of how governments could improve the regulatory environment, such as mention of laws criminalizing interpersonal violence, training for justice sector and law enforcement staff, training for healthcare providers, public education campaigns and training teachers would make this section more clear.

Page 4. Under “Risk and protective factors and determinants”, para 2, phrase “high density of alcohol outlets” is unclear. Consider revising sentence to: “These include: high rates of violence and crime in the community; poverty and unemployment; availability of drugs, alcohol and weapons (e.g. firearms, knives); low levels of enforcement of laws against violence;”

Page 5. Para. 3. “Discriminatory laws” is the very last phrase of the last sentence, buried in sub-phrase (d). However, such discriminatory laws are an inherent part of the system of sociocultural norms that the very first sentence addresses, and they have a broad impact that affects all sub-phrases in this section. Consider revising first sentence to: “Gender inequality, including power imbalances between men and women, sociocultural norms that tolerate violence, and discriminatory laws are at the root of most forms of violence against women and girls.” If this revision is accepted, the reference to discriminatory laws in the last sentence can be deleted.

Page 5. Para. 1. Refers to “different forms of violence” when the issue is not violence in general. Changing the phrase to: “these and other forms of interpersonal violence” would be more accurate.

Page 6. Item 6. Briefly cite not just the problem, but what kinds of efforts show some promise or it this effort starting from zero solutions? In a sense it is connected with Item 8 regarding civil societies, suggesting also partnering with key local efforts, leaders or ministries of health.

Page 6. Item 9. Cost effective methods for getting population based survey data on gender based and age based violence are needed. Recognizing this along with potential near-term proposals would help.

Page 6. Para. 9. This summary sentence is incomplete: “Very few countries, and almost no low- and middle-income countries, have prevalence data on elder abuse.” Please revise the sentence to read: “Very few countries, and almost no low- and middle-income countries, have prevalence data on interpersonal violence including elder abuse, abuse of persons with disabilities; violence against sexual minorities, migrants, displaced persons; or discriminatory treatment of survivors of sexual violence.”

Annex 1, p. 22.

Under the para. on “sexual violence”, the second sentence would be more accurate if it read: “It includes rape, defined as the physically forced or otherwise coerced penetration of the vulva, anus or other body part with a penis or object.”

Under “socio-ecological model for understanding violence”, there is no mention of traditions or beliefs, although both are relevant in this context, particularly in section (c) designating community norms

p. 23 under “violence against women,” several concepts related to economic suffering seem to be missing. For example, punitive economic deprivation and acts committed for the explicit purpose of making a woman to lose her job are forms of violence, too.
Annex 5, p 28
The list in Annex 5, WHO Secretariat involvement in violence-related partnerships and initiatives, is very valuable. It would be useful to add a link and/or contact person to be able to find out more if these entities are open to input and contributions. If they are not, but are just finite partnerships of the WHO Secretariat, please indicate that.

Annex 7, p. 30
Under “universal coverage and equity”, the list of marginalized persons would be more complete if it included caste, disability and gender identity – similar to “gender equality” in the same annex.
Under “gender equality,” the sentence “Eliminating gender-based discrimination, changing socio-cultural norms that tolerate violence and lead to unequal gender relations, and empowerment of women and girls” would be more accurate if it read: “Eliminating gender-based discrimination, changing socio-cultural norms that tolerate violence and lead to unequal gender relations, and empowering women and girls...”
Under “autonomy and empowerment”, protection of personal information is conspicuously absent. Optimally, there is clear delineation between public information that is in the public interest for the purpose or protecting the public wellbeing; and private or personal information which healthcare providers, law enforcement officials and other state actors are advised to hold in confidence unless the person is informed and also gives explicit consent.

Respectfully submitted,

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