Dear Madam, dear Sir,

Many thanks for making the drafting process such an inclusive process, and for inviting me to provide comments.
I am also delighted to see that the document brings together both prevention and response aspects. In recent years, development actors appear to have placed a stronger focus on prevention, sometimes channelling resources away from important work with survivors. I hope your document will help to redress the balance.

Based on my experience in international work on violence against women and violence against children, I would like to share a few suggestions with you:

- P.3 para.3 definition of Violence against women, 1st line: remove “other” in the phrase “violence by intimate partners and other family members”, as the definitions of what is a family vary and intimate partners are not necessarily family members.

- Same paragraph, last bullet point: I would phrase it “sexual harassment and sexual violence”, as violence in those settings remains quite hidden. In addition or alternatively, one could add “teachers, colleagues” to the examples given in the second bullet point on sexual violence.

- Although there is a special paragraph that refers to “intersectionality” (p.4 para.9), I would advocate for explicitly including transsexual persons, maybe in a short paragraph near the beginning of the text that makes it clear that the protective mechanisms that apply to “biological” women should also apply to transsexuals. Very often “trans-women” are extremely marginalised - they tend to be rejected by services for women and forgotten by women’s rights advocates. That issue could also be raised in the section on “gaps” (p.6).

- P.3 para.4 should include
  - o femicide in the form of the killing of baby girls and sex-selective abortion,
  - o harmful traditional practice, for instance the practice of denying certain types of nutritious food to girls (widespread in South Asian countries).

- P.4 para.8, “disproportionate vulnerability…” should include schools, as abuse by teachers and school mates is widespread.

- P.7 para.23: While it is true that there is lack of reliable data, the limits as to what data one can realistically obtain and the high cost of population surveys should be taken into consideration when making policy recommendations. Too often, the lack of reliable data on the incidence of VAW is used as an excuse for inaction. In a situation where resources are scarce and information is hard to get, I would privilege careful monitoring of interventions to end VAW over large-scale population surveys. I would suggest reworking that paragraph, to say that a large number of actors have engaged in promising interventions to end violence, and that in the future, resources should be made available to monitor and document such
work more carefully so as to distil wider knowledge. Gathering prevalence data could come as a second priority (as opposed to the 1st priority).

- P.9-10, guiding principles: principles (3) and (4) could be strengthened with an explicit reference to the rights of lesbian, bi- and transsexual women and girls. I realise this may be a delicate topic in a multilateral context, but the situation has much changed in recent years and perhaps this is the time to become more openly inclusive.

- P.13 para.2: Although data gaps are a problem, I would advocate for placing that issue at the end of the enumeration. I.e. The magnitude of the health burden, existing initiatives etc. should come first. Otherwise, decision makers might be encouraged to privilege expensive population surveys over much-needed action, or use the non-availability of data as an excuse for inaction.

Unfortunately my schedule is a bit tight these days and I have not had a chance to examine the annexes. I hope you will find the above comments useful.

Kind regards,

Michaela Raab

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