Web Based Consultations on the Development of a global plan of action to strengthen the role of the health system within a national multisectoral response to address interpersonal violence in particular against women and girls and against the child.

Comments on behalf of the Republic of Malta.

General comments on the plan of action and the several references to SRHR

In view of the numerous references to SRHR throughout the text Malta would like to restate its national position once again as it had done during the June consultations.

- The most effective way in combating interpersonal violence is to prevent it altogether. Unfortunately, this is not always possible and, if and when prevention fails, a culture of impunity and lack of care should not prevail.

- As highlighted in this Global Action Plan, a multisectoral approach is pivotal in addressing interpersonal violence, particularly the importance of effective and functioning health care services. The prevalence of violence against women and girls as well as against children in general highlights the need for strengthening awareness and for a national response that ensures that such abuses are appropriately dealt with.

- Whilst global in nature, such a plan should be sensitive to national legislation. In accordance with Articles 241 to 244 of the Maltese Criminal Code, Malta considers the termination of pregnancy through induced abortion as illegal, and does not recognise abortion as a measure of family planning.

- Recommendations made in the Global Plan of Action should not create obligations on any party to consider abortion as a legitimate form of reproductive health rights, services or commodities. In line with the law, such language cannot be accepted by Malta.

- References to SRHR clearly qualified through links to the 1994 International Conference on Population and Development and its Programme of Action can be accepted with the understanding of Malta’s reservation explaining its position on such matters.

Detailed comments & suggestions on the text:
Page 14 – Section A – Violence against women and girls
Second bullet - *Provision of comprehensive and quality services, particularly for sexual and reproductive health*

**Comment:** General qualifier under the general comments section refers. Malta would like to reformulate this sentence so it reads – *Provision of comprehensive and quality health care services, particularly for sexual and reproductive health*

Page 15 – Strategic Direction 1 - Point 6 – *Strengthen the accountability of the health system in ..........2) the mistreatment and abuse of women and girls by health workers, especially in reproductive health services....*

**Comment:** General qualifier under the general comments section refers. Malta would like to amend the above text so it reads: *the mistreatment and abuse of women and girls by health workers, especially in reproductive health care services....*

Pg 16 - Strategic Direction 2 - Point 8- For Member States ...
*Provide comprehensive services to all women and girls who have experienced violence including in humanitarian crisis settings. These should include: first-line support, care for injuries, sexual and reproductive health and mental health, services for post-rape care including emergency contraception, referrals to safe abortion in accordance with national laws, STI and HIV prophylaxis and Hepatitis B vaccination(30-33); services to manage the health complications among women and*

**Comment:** Malta has problems with the references to emergency contraception and references to referrals to safe abortions. General qualifier under the general comments section also applies. In addition MT would like to amend this text so it reads: *Provide comprehensive health care services to all women and girls who have experienced violence including in humanitarian crisis settings. These health care services should include: first-line support, care for injuries, sexual and reproductive health, mental health, services for post-rape care, STI and HIV prophylaxis and Hepatitis B vaccination(30-33);*

**Point 9.** *Improve access to services by integrating identification and care for women experiencing intimate partner violence and sexual violence into existing programmes and minimum services package for: sexual and reproductive health; maternal and child health, adolescent health; mental health; routine checks and health services for the elderly; and in humanitarian responses........*

**Comment:** General qualifier under the general comments section applies. MT would like to amend this text so it reads: *Improve access to health care services by integrating identification and care for women experiencing intimate partner violence and sexual violence into existing programmes addressing sexual and reproductive and health; maternal and child health; adolescent health; routine checks and health services for the elderly; and in humanitarian responses.*
Page 16 – Strategic Direction 2 - For the WHO Secretariat. Point 9. Include services to address VAWG in minimum package of health services including as part of universal health coverage (UHC) for sexual and reproductive health, maternal, child and adolescent health, mental health, including in humanitarian settings.

Comment: General qualifier under the general comments section also applies. MT would like to amend this text so it reads: Include services to address VAWG in minimum package of health care services including as part of universal health coverage (UHC) for sexual and reproductive health, maternal, child and adolescent health, mental health, including in humanitarian settings.

Page 31: Table 2 - Summary of indicators and global targets and links to SDG targets in Annex 6 referring to universal access to SRHR

Comment: General qualifier under the general comments section also applies. Malta cannot accept such an unqualified reference to SRHR.

Page 32 Means of verification: provision of comprehensive post-rape care is included in WHO’s HIV health sector response progress reporting. In line with WHO guidelines(30), post-rape care will include: first line support, emergency contraception, referrals to safe abortion in accordance with applicable laws, STI and/or HIV post-exposure prophylaxis as per applicable protocols and Hepatitis B vaccination.

Comment: General qualifier under the general comments section also applies. Malta cannot accept the reference to emergency contraception and safe abortion. MT would like to amend this text so it reads: Means of verification: provision of comprehensive post-rape care is included in WHO’s HIV health sector response progress reporting. In line with WHO guidelines(30), post-rape care will include: first line support, STI and/or HIV post-exposure prophylaxis as per applicable protocols and Hepatitis B vaccination.