



**A4AI/Web Foundation/Foundation for Media Alternatives Response
and Comments to**

**CEDAW Draft General Recommendation No. 19 (1992): accelerating
elimination of gender based violence against women**

To the CEDAW Secretariat

On behalf of the [Alliance for Affordable Internet](#), the [Web Foundation](#) and the [Foundation for Media Alternatives](#), we would like to make the following suggestions and additions to the CEDAW Draft General Recommendation No. 19 (1992).

Additions to “Scope”

Scope, paragraph 7/12

We suggest including a definition of online discrimination, and to specify how the updated recommendations/scope will refer to online discrimination throughout as well. Reference to GBV occurring in technologically mediated environment, e.g. cyberspace, needs to be clarified earlier on in the document.

Scope, paragraph 11

Paragraph 11 talks about intersectionality. However, there are also some sectors of women that were not mentioned all throughout the document, including women with disabilities, women living with HIV. We suggest including sectors of women who are not mentioned throughout, including women with disabilities, women living with HIV, marginalized women and gender identities in particular.



Additions to “General Obligations of State Parties”

General obligations of state parties, paragraph 13, c, ii.

We suggest including a provision on measures as to how to tackle discrimination online (as it is introduced in the beginning of the update document, so it should be clarified throughout in terms of measures as to how to prevent this kind of harassment). There should also be a clear role for private companies such as ISPs and telecommunications companies: to protect personal data/privacy; and to make it easier for women to report abuse (including in local languages) and ensure they respond to such reports quickly and effectively.

Additions to “Recommendations”

Recommendations, paragraph 15

15b ii. Encourage the reporting of incidences of GBV via online reporting platforms taking full advantage of the interactivity, anonymity and reach of Web-powered ICTs to provide a good range of services and information in user-friendly formats. Ensure online reporting portals are connected to law enforcement response mechanisms and allow reporting in all local languages.

15b ii. Emphasize the negative impacts of sharing/distributing online multi-media of sexual nature without the consent of those involved.

15c. Clarify what is meant by “media” in this context and include references to online media, including social media.

15c. Note that measures taken by the media to combat negative/stereotypical portrayals of women must not encourage excessive censorship or be based on moral policing by the state or institutions.



15c. Invest in large-scale, ongoing national awareness campaigns to stamp out online gender violence and educate Internet users on their digital rights, online privacy, and security.

15d. Education and training should include capacity building training and clear guidelines for the police, judiciary and other relevant institutions on how to deal with gender based violence carried out using ICT tools such as the Internet and social media.

15h. Specify provision of legal recourse for online harassment/discrimination - how are women legally protected? + assure specific laws are in place for victims of online/cyber violence to seek timely recourse against perpetrators. Awareness campaigns should be mounted to publicise the legal processes available for seeking redress.

Additions to Data collection and monitoring

- A. “States parties should encourage cooperation among all levels of the justice system” - including **interdepartmental cooperation** to address reports of online violence.
- B. Include need to collect data for instances of online gender-based discrimination and harassment, without further undermining privacy.

A4AI/Web Foundation recommendations based on research findings - Notes

The update document makes broad provision for the protection and monitoring of incidences of GBV but no specific mention is made as to how GBV incidences which occur online can be better addressed. The inclusion of cyberspace as a realm where women are in danger of harassment and bullying is a positive step, as it acknowledges the current reality and opening up of spaces where women are vulnerable to violence. However, there is no specific provision as to how this can be better controlled, what state and non-state actors can do to monitor



these instances of abuse and how the global community can address this through policy frameworks.

There is no legal framework mentioned that acts as a safeguard for security online. The frameworks mentioned are generic in nature and do not detail protection against online bullying of women and girls.

In 74% of countries included in the [Web Index](#), law enforcement agencies and the courts are failing to take appropriate actions in situations where ICTs are used to commit acts of gender-based violence. Governments must enact adequate legislative measures to protect the right to safety and bodily integrity of women and girls. These measures can be extended to ICT-mediated abuse without unnecessary intrusion on free speech and expression.

Governments must ensure that police, lawyers and judges are trained to understand and deal with ICT-based harassment against women, and can make effective use of the legal instruments that exist.

All stakeholders involved in digital literacy programmes in and beyond schools must ensure both boys and girls receive training in appropriate online behaviour, protecting privacy and safety and dealing with ICT-based abuse.

Online service providers must make it easier for women to report abuse (including in local languages) and ensure they respond to such reports quickly and effectively.

We hope these submissions will be of use to you in the revision of the document.

A4AI, The Web Foundation and Foundation for Media Alternatives