

PROTECTION OF VICTIMS, PARTICULARLY WOMEN AND CHILDREN AGAINST DOMESTIC VIOLENCE, SEXUAL OFFENSES AND HUMAN TRAFFICKING – PHILIPPINE EXPERIENCE

MYRNA S. FELICIANO

Executive Director

**Mandatory Continuing Legal Education Office, Supreme Court of the
Philippines, Member, Academic Council and Chair, Department of
Legal Method and Research, Philippine Judicial Academy and
Professorial Lecturer, University of the Philippines College of Law.**

1. THE SITUATION OF WOMEN AND CHILDREN

According to the Philippine National Police (PNP), violence against women (VAW) persists, with the number of reported crimes in 2004. Cases of physical injuries and wife battery reached 3,553 cases and declined to 2,335 cases in 2005. While probably the most gruesome, rape constitutes 6.28 percent out of 6,271 cases in 2004 compared to the 6.04 percent cases in 2005 reported to the police. These figures do not include cases of acts of lasciviousness, attempted rape, maltreatment, threats and other offenses.

There are 36.3 million Filipinos who are 19 years or younger (NSO 2000). Yet no group of Filipinos faces more hazards than do our children. Child abuse is a silent epidemic. A survey of the PNP data in 2004 and 2005 reflects the prevalence of crimes against children. Out of a total of 7557 cases in 2004, there were 3,398 cases of rape (incestuous rape included) which constitute 2.22% as compared in 2005 wherein there were 2,562 cases of rape or 2.11% of a total of 5,406 cases. Physical injuries and maltreatment cases came second with 1,893 cases in 2004 as against 1,019 cases in 2005.

However, these statistics maybe even higher considering that violence against women and children is usually shrouded in a culture of silence. Researcher demonstrate that revelations of violence within the family or in intimate relationships bring shame and scandal putting tremendous pressure on the victims to bear silently their physical suffering, mental anguish, fright, serious anxiety, besmirched reputation and social humiliation.

A number of women who leave the country as entertainers, fiancées of foreign nationals, service workers, tourists or undocumented workers fall victim to organized criminal syndicates. Their undocumented or illegal status has kept them outside the protection of laws. From 1992 to December 2002, the Philippine Foreign Service posts recorded 1,084 cases of human trafficking. Data reported is very low compared to the number of actual victims not reported. This may be attributed to the lack of a systematic monitoring mechanism on the movement of Filipino migrants. Women comprised 66 percent of the victims of whom 18 percent had been forced into prostitution. The Government repatriated 31 percent of the victims.¹

Since the new law was passed, the Philippine National Police conducted 25 rescue operations, rescued 137 persons and 57 persons as violators. The National Bureau of Investigation received and investigated 22 cases for violation of RA 9208.²

As defined by the UN Declaration on the Elimination of Violence Against Women, “violence against women includes physical, sexual and psychological violence occurring in the family, including battering, sexual abuse of female children in the household, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation. It also includes physical, sexual and psychological violence occurring in the

¹ National Commission on the Role of Filipino Women, Combined Fifth and Sixth Philippine Progress Report on the Implementation of the UN Convention on the Elimination of All Forms of Discrimination Against Women, 7 June 2004, p. 44. [hereinafter cited as 2006 PHIL. CEDAW REPORT.]

² *Ibid.*

family, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women, and forced prostitution.”³

But for purposes of this paper, only rape, trafficking in women, domestic violence, and child abuse will be discussed.

2. STATUTES DEALING WITH VIOLENCE AGAINST WOMEN AND CHILDREN

2.1 Anti-Rape Law of 1997

Rape under the old law is classified as a crime against chastity and is committed by having carnal knowledge of a woman by a man using force and intimidation; when the woman is deprived of reason or otherwise unconscious; and when the woman is under twelve years of age or is demented.⁴ The crime of rape cannot be prosecuted except upon a complaint filed by the offended party or her parents, grandparents, or guardian in that order.⁵

On 30 September 1997, Republic Act No. 8353⁶ was passed classifying rape as a crime against persons and thus, can now be prosecuted by the State. It expanded the definition of rape by including sexual assault by any person who by inserting his penis into another person’s mouth or anal orifice, or any instrument, into the genital or anal orifice of another person.⁷ Note that the second paragraph is gender-neutral, *i.e.* the crime can be committed by a man or a woman on another woman or man. Moreover, it

³ U.N.G.A. A/RES/48/104, 20 December 1993.

⁴ REV. PEN. CODE, art. 335.

⁵ REV. PEN. CODE, art. 344.

⁶ Amended Rev. Penal Code by repealing art. 335 and transferring some of its provisions to art. 266-A.

⁷ *Id.*, art. 266-A, par. 2; In *People v. Camilo Soriano*, G.R. Nos. 142779-95, August 29, 2002, the Supreme Court held that the insertion of a finger into the genitalia of a child constitutes rape through sexual assault.

impliedly recognizes marital rape because the law states that “in case it is the legal husband who is the offender, the subsequent forgiveness by the wife as the offended party shall extinguish the criminal action or penalty.” However, this does not apply if the marriage is void *ab initio*. Likewise, the subsequent valid marriage between the offender and offended party shall extinguish the criminal action or penalty imposed.⁸

There is no incest crime *per se* but it is an aggravating or qualifying circumstance in Republic Act No. 7659 (1993) and Republic Act No. 8353 (1997) as it impose the death penalty if the crime of rape is committed when the victim is under 18 years of age and the offender is a parent, stepparent, guardian, relative by consanguinity or affinity within the third degree or the common-law spouse of the parent of the victim.⁹

A year later, Republic Act No. 8505 or the Rape Victim Assistance and Protection Act of 1998 was enacted which provided for the establishment in every province and city, a rape crisis center located in a government hospital or health clinic or in any other suitable place for the purpose of:

- (a) providing rape victims with psychological counseling, medical and health services, including medico-legal examination;
- (b) securing free legal assistance or service, when necessary for rape victims;
- (c) assisting rape victims in the investigation to hasten the arrest of offenders and the filing of cases in court;
- (d) ensuring the privacy and safety of rape victims;
- (e) providing psychological counseling and medical services whenever necessary for the family of rape victims;
- (f) developing and undertaking a training program for law enforcement officers, lawyers, medico-legal officers, social workers and *barangay* officials on human rights and responsibilities, gender sensitivity and legal management of rape cases; and

⁸ *Id.*, art. 266-C.

⁹ *Id.*, art. 266-B. Rep. Act No. 9346 prohibited the imposition of the death penalty on June 24, 2006.

(g) adopting and implementing programs for the recovery of rape victims.¹⁰

The Department of Social Welfare and Development (DSWD) is the lead agency in the establishment and operation of these centers.

The law also specifies the procedure which a police officer, an examining physician and a prosecutor must follow upon receipt of a complaint of rape. For this purpose, women's desk must be established in every police precinct throughout the country to conduct investigation by a policewoman. Likewise, the physician and prosecutor must be females assigned to the case.¹¹

Other protective measures specified are: the right to privacy of the offended party and the accused at any stage of the investigation, prosecution and trial; the name and personal circumstances of the offended party and/or the accused, or any other information tending to establish their identities; and such circumstances or information on the complaint shall not be disclosed to the public.¹²

A notable feature of this law is the rape shield provision. Section 6 provides that in prosecutions for rape, evidence of complainant's past sexual conduct, opinion thereof or of his/her reputation shall not be admitted unless, and only to the extent that the court finds that such evidence is material and relevant to the case.

The DSWD runs a crisis intervention unit in all 15 regions of the country. Each unit has a 24-hour hotline operation that provides counseling service through the telephone, carries out rescue operations, refers the victims to appropriate agencies and gives other types of support.

¹⁰ Rep. Act No. 8505 (1998), sec. 3.

¹¹ *Id.*

¹² *Id.*, sec. 5.

The National Bureau of Investigation also has a one-stop crisis unit in Metro Manila and in some of its regional offices in the country. The DSWD's rehabilitation project for Women in Especially Difficult Circumstances (WEDC) provides temporary care and rehabilitation to women victims of involuntary or forced prostitution, illegal recruitment, battery and sexual abuse as well as women survivors of armed conflict and detention. Thirteen homes called "The Haven" operates nationwide, and they offer residential care, including food, medical care and psychological services; referrals for legal, psychiatric and other services necessary for early recovery of victims, and training in livelihood skills.¹³

2.2 Anti-Trafficking in Persons Act of 2003

Mail-order brides, prostitutes, sex-slaves – these are only a few of the degrading forms of work forced upon Filipino women in various sectors of the world. All these "jobs" are associated with what is known as sex trafficking, which is the systematic and organized transport of women and children for the purpose of sex for profit. The UN estimates that four million persons a year are traded against their will, earning their captors annual profits of up to USD7 billion.¹⁴

The passage of Republic Act No. 9208 in 26 May 2003 is an example of the combined advocacy of government agencies and inter-agency councils and the civil society groups that provided technical inputs and political pressure.¹⁵ Subsequently, the Inter-Council Against Trafficking (ICAT) was formed with the Department of Justice as the lead agency.

¹³ PHIL. CEDAW REPORT (2006), p. 50.

¹⁴ R. Coomaraswamy, INTEGRATION OF THE HUMAN RIGHTS OF WOMEN AND THE GENDER PERSPECTIVE; VIOLENCE AGAINST WOMEN (UN Commission on Human Rights, 2000) 10.

¹⁵ PHIL. CEDAW REPORT, p. 46.

The main features of the law are:

(a) It defines as criminal the acts of trafficking in persons and acts to promote trafficking in persons. “Trafficking” covers a wide range of activities that are carried out for the purpose of prostitution, pornography, sexual exploitation, forced labor, slavery, involuntary servitude or debt bondage, removal or sale of organs whether any of these happened in the country or abroad, or whether the victims are Filipino nationals or foreigners trafficked to the Philippines.¹⁶

(b) It redefines prostitution from a crime committed by women only to “any act, transaction, scheme or design involving the use of a person by another, for sexual intercourse or lascivious conduct in exchange for money, profit or any consideration, with the criminal liability assigned to those who promote it through trafficking in persons.¹⁷ In this regard, the consent of a trafficked person to the intended exploitation shall be irrelevant.¹⁸

(c) It sets penalties for various types of offenses related to trafficking. The stiffest sanctions (life imprisonment and a fine of up to Php5 million) are reserved for any person found guilty if the trafficked person was a child, or the person trafficked , died or incurred HIV-AIDS, or the offender was related to the victim or a member of the government law enforcement units.¹⁹ Note that any person who buys or engage the services of trafficked person for prostitution shall be penalized six months of community service and a fine of Php50 thousand. For subsequent offenses, imprisonment of one year and a fine of Php100 thousand.²⁰ These fines are placed in a Trust Fund that will cover cost of implementing mandatory programs under the law and other measures to

¹⁶ Rep. Act No. 9208 (2003), secs. 3-5.

¹⁷ *Id.*, sec. 39(c) & sec. 10 in relation to sec. 4(a).

¹⁸ *Id.*, sec. 17.

¹⁹ Sec. 10.

²⁰ Sec. 11.

prevent trafficking in persons and to rehabilitate and reintegrate victims to the mainstream of society.²¹

(d) Aside from the right to privacy given to the trafficked person at any stage of the investigation, prosecution and trial,²² the law requires the State to provide mandatory services to trafficked persons such as emergency shelter, counseling, free legal services, medical or psychological services, livelihood and skills training and educational assistance.²³

(e) It gave various government agencies specific duties and responsibilities which, among others, are: Department of Foreign Affairs to make available resources and facilities overseas for trafficked person;²⁴ DSWD to conduct rehabilitative and protective programs for trafficked persons;²⁵ the Department of Labor and Employment to ensure the strict implementation and compliance with the rules and guidelines relative to employment of persons locally and overseas;²⁶ Department of Justice to designate and train special prosecutors who shall handle and prosecute trafficking cases as well as establish a mechanism for free legal assistance;²⁷ and the Philippine National Police as the primary law enforcement agency to undertake surveillance, investigation and arrest of persons suspected to be engaged in trafficking.²⁸

Civil Society groups and non-governmental organizations (NGOs) have set up multi-sector watch groups which are engaged in the delivery of services such as shelter, pre-departure training, education of the public and counseling. All these are reflected in

²¹ Sec. 15.

²² *Id.*, sec. 7.

²³ *Id.*, sec. 23.

²⁴ *Id.*, sec. 16(a).

²⁵ *Id.*, sec. 16(b).

²⁶ *Id.*, sec. 16(c).

²⁷ *Id.*, sec. 16(d).

²⁸ *Id.*, sec. 16(g).

the activities of Coalition Against Trafficking in Women in Asia Pacific (CATWAP) which works in partnership with more than 22 NGOs all over the Philippines and has been working on the issue of trafficking for over a decade, both nationally and internationally. The Coalition undertakes regular training program on human rights, developed documentation system on violence against women, especially trafficking and has organized community-based programs for the youth and *barangay* officials. With its international network partners, the Coalition has helped trafficked victims who return to the country, particularly those from Japan and Korea. Among its members are WOMENLEAD and *SALIGAN* which provide legal assistance and advice to trafficked victims.²⁹

2.3 The Special Protection of Children Against Child Abuse, Exploitation and Discrimination

Republic Act No. 7610 (1992) is a landmark legislation in that it recognizes the psychological and socio-cultural circumstances that motivate child abuse by reflecting contemporary development not appreciated by previous laws on child protection, by embodying the principle that “the best interests of the child should be paramount consideration in all actions concerning them.” The statute views child principals or accessories in crimes as victims of abuse or exploitation rather than offenders.³⁰

The law punishes the following acts of child abuse and the attempt to commit such child exploitation:

- (a) Child prostitution and other sexual abuse;³¹
- (b) Child trafficking;³²

²⁹ PHIL. CEDAW REPORT, p. 48.

³⁰ Rep. Act No. 9344 was recently enacted on 26 April 2006 which raises the minimum age of criminal irresponsibility from 9 to 15 years; institutes a comprehensive juvenile justice intervention program, kinds of diversion programs, rehabilitation and reintegration, and the application of the principles of restorative justice applicable to the child in conflict with the law.

³¹ Rep. Act No. 7610 (1992), art. III, sec. 5.

- (c) Hiring, employing, using, persuading, inducing or coercing them to perform in obscene publication and indecent shows;³³
- (d) Other acts of neglect, abuses or exploitation prejudicial to child development including those covered by Art. 59 of Presidential Decree No. 603.³⁴

Any person who shall keep or have in his company a minor, 12 years or under, or who is 10 years or more his junior, in any public or private place, hotel, motel, cabaret and similar places is liable unless the person is related within the fourth degree of consanguinity or affinity.³⁵ When the child has been subjected to abuse or maltreatment, Section 28 mandates that he shall be immediately placed under the protective custody of the DSWD. Any head of any public or private hospital, medical clinic or similar institution as well as the attending physician and nurse are required to make an oral or written report to the DSWD of the examination or treatment of a child who appears to have suffered abuse within 48 hours from knowledge of the abuse. Likewise, it is the duty of government workers to report all incidents of possible child abuse to the DSWD.³⁶ The name of the offended party shall be withheld from the public and any editor, publisher and reporter is liable if such sensationalized publicity of any case results in the moral degradation and suffering of the victim.³⁷

An NGO, End Child Prostitution, Child Pornography and the Trafficking of Children for Sexual Purposes (ECPAT) Philippines is a member of a global network to protect children from commercial sexual exploitation. It has long been engaged in six activities: information drive; monitoring of sex exploiters and facilitation of their

³² *Id.*, art. IV, sec. 7.

³³ *Id.*, art. V, sec. 9.

³⁴ Child and Youth Welfare Code; *Id.*, art. VI, sec. 12-16 of Rep. Act No. 7610.

³⁵ *Id.*, art. VI, sec. 10(b).

³⁶ Rules and Regulations on the Reporting of Child Abuse Cases (1993), secs. 4 & 5.

³⁷ Rep. Act No. 7610 (1992), sec. 29.

prosecution through casework; legal assistance and delivery of services to child victims; networking and advocacy; research and documentation; and child participation activities.³⁸

The *Visayan* Forum Foundation which is helping migrant child domestic workers, operates a half-way house in the Manila North Harbor in partnership with the Philippine Ports Authority. The Department of Health has institutionalized its Women and Child Protection Program in 44 hospitals nationwide which is a 24-hour quick response that delivers personalized health care to survivors in collaboration with the Child Protection Unit of the Philippine General Hospital and the University of the Philippines.³⁹

In 2002, Local and *Barangay* Councils for the Protection of Children can be found in 3,354 *barangays* with the assistance of the Department of the Interior and Local Government. On the other hand, the Department of Justice have set up Task Force on Child Protection which investigates, litigates, and prosecutes cases of child abuse and exploitation.⁴⁰

Pursuant to Republic Act No. 8369, the Supreme Court established family courts in major cities all over the country wherein violations of RA 7610 and domestic violence fall within their jurisdiction. The Supreme Court has promulgated the Rule on Examination of a Child Witness (2000) which aims to create an environment to give reliable and complete evidence, minimize their trauma and promote maximum accommodation of child witness and makes use of live-link television, screens and devices to avoid trauma on the child.⁴¹ It also authorizes the judge to appoint a guardian *ad litem*, an interpreter, a facilitator and support person for the child during trial, including the use of anatomical dolls.

³⁸ PHIL. CEDAW REPORT, p. 48.

³⁹ PHIL. CEDAW REPORT, p. 48.

⁴⁰ *Id.*, p. 49.

⁴¹ A.M. No. 79-2000, effective 15 December 2000.

Other rules promulgated by the Supreme Court are: Rules on Juveniles in Conflict with the Law;⁴² Rule on Custody of Minors and Writ of *Habeas Corpus* in Relation to Custody of Minors;⁴³ Rule on Guardianship of Minors;⁴⁴ Rule on Adoption;⁴⁵ Rule on Commitment of Children;⁴⁶ and the Rule on Violence Against Women and Their Children.⁴⁷

The Philippine Judicial Academy,⁴⁸ being the training arm of the Supreme Court has been assisted by the UNICEF in its 10 multi-sectoral seminars on juvenile and domestic relation for the family court judges and personnel and partners in the five pillars of the criminal justice system which is multi-disciplinary in nature.

2.4 The Anti-Violence Against Women and Their Children Act

After nine years of advocacy by women's groups and the National Commission on the Role of Filipino Women (NCRFW), Congress enacted Republic Act No. 9262 on 08 March 2004. This landmark legislation finally recognized that violence against women is a widespread societal problem with consequences reaching far beyond the realm of the family for it causes devastating effects not only on the victim but on the community as well. The perceived lack of response or reluctance of the police and prosecutors reinforces the escalating, recurring and often serious nature of violence against women and children.

Violence against women and their children refers to any act or a series of acts committed by any person against a woman who is his wife, former wife, or against a

⁴² A.M. No. 02-18-SC, effective 15 April 2002.

⁴³ A.M. No. 03-04-04-SC, effective 15 March 2003.

⁴⁴ A.M. No. 03-02-05-SC, effective 01 May 2003.

⁴⁵ A.M. No. 02-6-02-SC, effective 22 August 2002.

⁴⁶ A.M. No. 02-1-19-SC, effective 15 April 2002.

⁴⁷ A.M. No. 04-10-11-SC, effective 15 November 2004.

⁴⁸ Rep. Act No. 8557 (1998).

woman with whom the person has or had a sexual or dating relationship, or with whom he has a common child, or against her child, whether legitimate or illegitimate, within or without the family abode, which result in physical, sexual, psychological harm or suffering, or economic abuse including threats of such acts, battery, assault, coercion, harassment or arbitrary deprivation of liberty.⁴⁹ In view of the fact that domestic violence occurs within the family was considered a private affair, violence against women and children is now a public offense and any citizen having personal knowledge of the circumstances involving its commission can file a complaint.⁵⁰

The law protects women and their children from physical, psychological and economic abuses in the context of marital, dating or common law relationship.⁵¹ The law also recognizes the “battered woman syndrome” (BWS)⁵² which refers to a scientifically defined pattern of psychological and behavioral symptoms found in women living in battering relationships as a result of cumulative abuse.⁵³ Victim survivors who are found by the courts to be suffering from BWS do not incur any criminal and civil liability notwithstanding the absence of any of the elements for justifying circumstances of self-defense under the Revised Penal Code.⁵⁴ In the determination of the state of mind of women suffering from BWS at the time of the commission of the crime, the courts shall be assisted by expert psychiatrists or psychologists.⁵⁵ A victim suffering from BWS shall not be disqualified from having custody of her children. In no case shall the custody of minor children be given to the perpetrator of a woman who is suffering

⁴⁹ Rep. Act No. 9262 (2004), sec. 3(a).

⁵⁰ *Id.*, sec. 25.

⁵¹ *Id.*, sec. 5.

⁵² In *People v. Genosa*, G.R. No. 135981, January 15, 2004 recognizes BWS as a form of self-defense but in this case, it fell short of proving all three phases of the cycle of violence which must be experienced in at least two battering episodes between the woman and her intimate partner.

⁵³ *Id.*, sec. 3(c).

⁵⁴ *Id.*, sec. 26, 1st par.

⁵⁵ *Id.*, sec. 26, 2nd par.

from BWS.⁵⁶ Moreover, being under the influence of alcohol, any illegal drug or any other mind-altering substance shall not be a defense by the perpetrator under this Act.⁵⁷

Among the notable features of this law are:

a. The issuance of protection orders which aim to stop the violence as well as to prevent further acts of violence against the family, particularly women and children.⁵⁸

b. Being a public crime, there is a broader enumeration of persons eligible to file petitions for protection orders which include police officers, DSWD or LGU social workers, *punong barangay* or *barangay kagawad*, lawyer, counselor, therapist or health care provider of the petitioner, and at least two concerned responsible citizens who have personal knowledge of the offense committed.⁵⁹

c. There are several reliefs available to the offended party such as removing and excluding the offender from the residence regardless of ownership; requiring the respondent to stay away from the offended party; requiring the respondent to receive professional counseling from a court-approved source; and awarding offended party actual damages caused by the violence including property damage, medical expenses, child care expenses and loss of income.⁶⁰

d. Victims have the following rights: To be treated with respect and dignity; to avail of legal assistance from the Public Attorney's Office; to be entitled to support services from DSWD, LGUs and the Department of Health; to be entitled to paid leave of absence up to 10 days; and non-payment of filing fees and other court fees.⁶¹

⁵⁶ *Id.*, sec. 28.

⁵⁷ *Id.*, sec. 27.

⁵⁸ Rep. Act No. 9262 (1994), secs. 14-16.

⁵⁹ *Id.*, sec. 9.

⁶⁰ *Id.*, sec. 8.

⁶¹ *Id.*, secs. 35, 38, 41 & 43.

e. All records pertaining to VAW cases are all confidential without the victim's consent and its violation is subject to contempt of court.⁶²

f. An Inter-Agency Council on Violence Against Women and Their Children composed of 12 government agencies was established to formulate programs and projects to eliminate VAWC.⁶³

The NGO Community is credited not only for raising domestic violence as a public issue, but also for providing services long before the government recognized it. Among these were *Libok Pilipina's Bantay Banay* (Community Watch in Cebu City); the COMBAT-Vaw (Community-Based Approach to Violence Against Women) which was pioneered by the Women's Legal Bureau and adopted by Quezon City.⁶⁴

The Women's Crisis Center (WCC) for victims/survivors is located in 18 cities and municipalities nationwide. It is a community-based strategy of preparing family members to protect themselves from violence and manage peaceful resolution of conflict within the context of family relation thru multi-agency action groups from the *barangay* to the regional level. Also involved in the crusade against VAW are three legal groups, *SALIGAN* (*Sentro ng Alternatibong Lingap Panlegal*), Women's Legal Bureau and *KALAKASAN* (*Kababaihan Laban sa Karahasan*) which also provides shelter and counseling. They carry activities such as *Tigil Bugbog* (Stop Wife Battering), a hotline for counseling, self-defense classes, paralegal training and research to establish baseline status of women's rights against VAW.⁶⁵

⁶² *Id.*, sec. 44.

⁶³ *Id.*, sec. 39.

⁶⁴ PHIL. CEDAW REPORT, p. 52.

⁶⁵ *Ibid.*

3. CONCLUSION

It is apparent that a more comprehensive, coordinated and multi-agency approach to VAW is needed to ensure a more timely, responsive environment for women victims, including a gender-sensitive judicial framework that safeguards the safety and welfare of victims throughout the proceedings and processes of the criminal justice system.

Indeed, the vulnerability of women to violence is the result of the incidence of poverty, government's role in pushing labor migration and the view that the problem is simply one of illegal recruitment, lack of economic opportunities and the gendered stereotyped categories of women's work in the local economy.

In the absence of baseline data and reliable estimates of VAWC and other gender-based violence, the government cannot gauge any concrete progress in this area.