



Vienna, 31 January 2024

## **Strengthening the EU Directive on VAW and DV: A Call for Gender-Specific Measures and the Essential Inclusion of Women Specialist Services**

The WAVE Network, representing over 1,600 Women's Specialist Services across 46 European countries, is at the forefront of advocating for women's rights and has been actively involved in providing expert analysis and amendments for the proposed EU Directive on Violence Against Women and Domestic Violence (2022/0066 (COD)). Our commitment is unwavering in creating a Directive that elevates and protects women's rights in Europe.

The WAVE Network is united in **unreservedly condemning the Member States' failure to incorporate a consent-based definition of rape, as well as their adoption of a gender-neutral approach in addressing violence against women and domestic violence in the Directive.** In our decades of advocacy, we have observed a concerning trend of **increasing gender-neutral policies** across Europe. These policies, often **masquerading as inclusive**, actually **obscure the specific challenges faced by women in VAW and DV**, as starkly highlighted during the COVID-19 pandemic and by the ongoing high rates of femicide across Europe<sup>1</sup>. This underscores the urgent need for a Directive that explicitly adopts a gender-specific approach, in line with the Istanbul Convention's standards for protecting women's rights.

The Council's resistance to including Article 5 on rape and their gender-neutral approach is alarming. **We urge continued action to ensure this essential protection is not omitted.** Despite these challenges, WAVE will continue to advocate for essential protections. We are committed to advocating until the end towards a Directive that provides comprehensive protections for all women.

A critical aspect of our advocacy is the **recognition and explicit inclusion of Women Specialist Services (WSS) within the Directive's articles and recitals.** The recognition and inclusion of Women Specialist Services in sectoral legislation does not in any way undermine the existence or significance of general support services. However, **unlike general support services, WSS offer targeted, gender-sensitive assistance, vital to the prevention of revictimisation and vulnerability among women victims, addressing the intersecting and diverse needs of women.** Ensuring direct access to these services is not just an ethical imperative for all women, but also crucial for protecting the rights of victims with special protection and support needs which are not adequately catered for by general services, particularly those facing **intersectional discrimination**, such as migrant women, minoritized women, women of colour, women with disabilities, and LGBTIQ women, among others.

Based on the above, WAVE strongly calls for the **integration of Women Specialist Services into the Directive, ensuring they complement general victim support services.** This approach aligns with our dedication to a collaborative, multi-agency working method, and reflects the minimum standards set by the Istanbul Convention<sup>2</sup>.

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<sup>1</sup> EIGE. (2023). Gender Equality Index 2023: Violence. Retrieved from <https://eige.europa.eu/gender-equality-index/2023/domain/violence>

<sup>2</sup> Istanbul Convention. **Article 20 – General support services.** 1. Parties shall take the necessary legislative or other measures to ensure that victims have access to services facilitating their recovery from violence. These measures should include, when necessary, services such as legal and psychological counselling, financial assistance, housing, education, training and assistance in finding employment. 2. Parties shall take the necessary legislative or other measures to ensure that victims have access to health care and social services and that services are adequately resourced and professionals are trained to assist victims and refer them to the appropriate services. **Article 22. Specialist support services.** 1. Parties shall take the necessary legislative or other measures to provide or arrange



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We also draw your attention to the recently published [2023 WAVE Country Report](#)<sup>3</sup> that underscores the critical significance of Women Specialist Services (WSS) in Europe. The report exposes the detrimental repercussions stemming from WSS's inadequate availability, a consequence of gender-neutral policies that have led to a decrease in funding and investment in feminist organisations and services. This profoundly concerning situation is further exacerbated by escalating opposition toward feminist organizations and the women's rights agenda, which ultimately undermines and restricts women's access to protection and support in cases of violence against women and domestic violence.

The EU's commitment to the Istanbul Convention, while commendable, is not comprehensive enough in scope and impact, hence it requires a more comprehensive embrace in the Directive. We urge the European Parliament to fully adopt the Convention's holistic 4-Ps approach including effective Prevention, Protection, Prosecution, and Integrated Policies. **We caution against adopting gender-neutral articles in the Directive that would weaken or bypass these essential benchmarks**, in particular concerning Women's Specialist Services, as it could diminish the focus on the specific issues faced by women.

Excluding or undermining the role of WSS in the Directive, driven by a gender-neutral agenda and perspective, would not only undermine women's fundamental rights in Europe but also jeopardize the survival of women's organisations providing such support. Experience, particularly during the COVID-19 pandemic, has shown how gender-neutral policies can restrict the operational capacity of these organizations while violence against women and domestic violence exponentially increases, including rates of femicide and infanticide.

**We stand resolute in our demand for the recognition and inclusion of WSS in the Directive, a non-negotiable condition for the continued support of the proposed Directive by WAVE and its 1,600 members. If the proposed Directive fails to adopt a gender-specific, intersectional approach and include Women Specialist Services, we will have no other option than to openly withdraw support for the Directive for failing to serve its main purpose of preventing and combating violence against women and domestic violence in the European Union.**

For more details on specific demands and proposed amendments, please refer to our previous statements [here](#) and [here](#).

Sincerely,

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for, in an adequate geographical distribution, immediate, short- and long-term specialist support services to any victim subjected to any of the acts of violence covered by the scope of this Convention. 2. Parties shall provide or arrange for specialist women's support services to all women victims of violence and their children.

<sup>3</sup> The WAVE Country Report stands as the sole research tool monitoring the compliance of signatory countries with the Istanbul Convention's requirements for providing Women Specialised Services (WSS). This report offers a consistent and detailed overview of the status and provision of women's specialist services in Europe. It serves as a key source of evidence, highlighting both the current situation and the significance of these services.



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