



**Women Enabled International Submission to the CEDAW Committee:
Comments on Draft Update to General Recommendation No. 19**

This submission was drafted by Women Enabled International (WEI) and is endorsed by: Advocacy for Women with Disabilities Initiative (AWWDI) (Nigeria); Association of Disabled Women, ONE.pl (Poland); CREA (India); Handicap International's Making It Work Initiative on Gender and Disability (France); Legal Defence and Assistance Project (LEDAP) (Nigeria); National Union of Women with Disabilities of Uganda (NUWODU); Shanta Memorial Rehabilitation Centre (India); Sisters of Frida (United Kingdom); and Women with Disabilities India Network (WWDIN).

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WEI advocates and educates for the human rights of all women and girls, emphasizing women and girls with disabilities, and works to include women and girls with disabilities in international resolutions, policies, and programs addressing women's human rights and development. The organizations endorsing this report include organizations of persons with disabilities (DPOs) and those working on the rights of women with disabilities around the world.



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I. Introduction

According to the World Health Organization and the World Bank, women and girls with disabilities¹ constitute 19.2% of women worldwide, making up a substantial portion of the population.² Due to discrimination based on both their gender and disability, women with disabilities experience violations of their rights that are distinct from those experienced by other women. In particular, women with disabilities experience gender-based violence at higher rates than other women, and the violence they experience also has unique forms, causes, and consequences.³

Based on the specific issues that women with disabilities experience when exercising their right to be free from violence, this submission provides targeted comments to the CEDAW Committee on its *Draft update to General Recommendation No. 19 (1992): accelerating elimination of gender-based violence against women*. These comments focus both on how to more explicitly include women with disabilities in the draft and also how to ensure that the draft's provisions adequately address the barriers and issues that women with disabilities disproportionately face when exercising their right to be free from violence. As such, this submission provides both suggested amendments to the current paragraphs of the draft General Recommendation and suggestions for additional paragraphs and sections to include in the draft.

The amendments suggested below are important for our work on the rights of women with disabilities for several reasons. Although many of the countries that have ratified CEDAW have also ratified the Convention on the Rights of Persons with Disabilities (CRPD), and the CRPD Committee recently issued a general comment on the rights of women and girls with disabilities that addresses gender-based violence, there is not a perfect overlap between states parties to the two conventions. Additionally, although the CRPD Committee has weighed in on many of the issues that lead to violence against women with disabilities—including denying them legal capacity and arbitrarily detaining them in institutions, based on disability—many states have not fully adopted the human rights-based approach to these issues and still allow, and frequently legally permit, these violations to take place. As the CEDAW Committee is the human rights leader in efforts to eliminate violence against women, many states and our organizations would benefit from the CEDAW Committee's additional guidance on these issues. Finally, by ensuring that women with disabilities are better included in the updated General Recommendation No. 19, the CEDAW Committee will be recognizing the unique experiences of women with disabilities while also including them in the framework of women's rights, helping to reduce stigma targeted at women with disabilities by ensuring that their experiences are no longer invisible and that they are fully recognized as women and as rights holders.

II. Background on Violence against Women with Disabilities

Women with disabilities are at least two to three times more likely than women without disabilities to experience violence and abuse,⁴ and they are likely to experience abuse over a longer period of time, resulting in more severe injuries.⁵ Violence committed against women with disabilities can take a variety of forms—physical, emotional, sexual, psychological, and financial—and includes intimate partner violence, violence at the hands of caregivers, abandonment, neglect, institutional violence, and forced reproductive health procedures.⁶ As the CRPD Committee has recognized in its recent General Comment No. 3, harmful stereotypes perpetuate violence against women with disabilities, because these stereotypes “infantilize women with disabilities, call into question their ability to make judgments, and [reinforce] perceptions of women with disabilities as being asexual, or hypersexual...”⁷

In addition to being at greater risk of interpersonal and institutional violence, women with disabilities encounter numerous barriers to reporting abusers, ending the cycle of violence, and accessing justice. Indeed, women with disabilities may fear leaving or reporting their abuser because of emotional, financial, or physical dependence, and abusers may alter the physical or sensory environment in such a way that makes it more difficult for women with disabilities to take care of themselves or leave abusive relationships.⁸ Women with disabilities who are victims of violence, particularly family or intimate partner violence, frequently find it difficult to access emergency services to escape these violent situations. Shortages of accessible domestic violence shelters and available beds are widespread,⁹ and shelters and spaces that are available are often inaccessible and fail to provide reasonable accommodations to women with disabilities and women who have children with disabilities, or exclude them altogether.¹⁰ Additionally shelters may have “no animal” policies that serve as a barrier to women who rely on a service animal such as a guide dog.¹¹

Furthermore, women with disabilities face specific barriers to justice after experiencing violence. As the CRPD Committee noted in its General Comment No. 3, these barriers are due to “harmful stereotypes, discrimination and lack of procedural and reasonable accommodations, which can lead to their credibility being doubted and their accusations being dismissed.”¹² The testimonies of women with intellectual or psychosocial disabilities in particular “are dismissed from court proceedings because of legal capacity, thus denying them justice and effective remedies as victims of violence.”¹³ This situation is particularly acute when women with disabilities are victims of sexual violence, where victim testimony may be the most crucial piece of evidence for securing a conviction.¹⁴

The CEDAW Committee has itself frequently recommended that states take particular steps to ensure that women with disabilities are free from violence. For instance, the CEDAW Committee has expressed concern to states about lack of information on the types of violence committed against women with disabilities,¹⁵ including forced or coerced sterilization,¹⁶ and has further noted with concern that, when it comes to violence, women with disabilities “are not seen as a particular group with particular needs.”¹⁷ It has also frequently expressed concern about the barriers women with disabilities face in accessing services to address this violence, including the inaccessibility of shelters and crisis centers.¹⁸ The CEDAW Committee has called on states to collect particular data on violence against women with disabilities and address their specific needs.¹⁹ It has also recommended that states provide training to medical professionals to “raise awareness toward their own prejudices” about women with disabilities, as a means of preventing violence,²⁰ and “to monitor the provision of social services with a view to ensuring the availability of a sufficient number of shelters equipped to accommodate women with disabilities.”²¹ Finally, the CEDAW Committee has recognized that women with disabilities face particular barriers in accessing justice, including physical barriers, and in its General Recommendation No. 33 on access to justice has called on states to “[p]ay special attention to access to justice systems for women with disabilities.”²²

III. Recommendations for Additional Content in Updated General Recommendation No. 19

A. Definition of Gender-Based Violence

As noted above, several forms of violence against women solely or disproportionately affect women with disabilities, including among others: abandonment; neglect; denying women with disabilities needed care; changing the accessibility of the environment around women with disabilities; involuntary sterilization and “other medical procedures performed without free and informed consent, including those related to contraception and abortion;”²³ involuntary institutionalization; and “the administration of electroshocks, chemical, physical, or mechanical restraints” without consent.²⁴ Treaty monitoring bodies and human rights experts, including the CEDAW Committee, have recognized that these abuses are severe human rights violations, including forms of violence against women.²⁵ However, states consistently either fail to

prevent these forms of violence or too frequently legally permit them to take place, in particular by formally or informally depriving women with disabilities of legal capacity and allowing parents, guardians, or others to make decisions on their behalf.²⁶

In its General Comment No. 3 on women with disabilities, the CRPD Committee specifically lists the forms of violence women with disabilities experience.²⁷ By describing the actions that constitute violence against women and the forms that disproportionately affect women with disabilities, the CRPD Committee has provided clear guidance to states about how to accelerate its elimination. In order to ensure that violence against women with disabilities is fully addressed in the updated General Recommendation No. 19, and that the elimination of violence against women is accelerated for all women, we recommend that the CEDAW Committee take a similar approach. Currently, the draft update to General Recommendation No. 19 does not contain a comprehensive list of violations that human rights bodies have recognized as forms of violence against women. Although this may be a strategic decision, we believe that the draft as written does not provide sufficient guidance to states about how to identify violence against women in all its forms, particularly as it affects women with disabilities.

With this concern in mind, WEI recommends that the CEDAW Committee insert an additional paragraph, between paragraphs 9 and 10, that contains a list of violations that human rights bodies have recognized as forms of violence against women, including those cited above that solely or disproportionately affect women with disabilities. This list should focus in particular on forms of violence that states frequently do not recognize as such, in particular forced reproductive health interventions without the woman's consent, other forced medical procedures, forced institutionalization, abandonment, neglect, and depriving women of accessible environments. To provide the needed context for many of these violations, this paragraph or another should also contain information on what constitutes informed consent for medical procedures, including sterilization, abortion, contraception, and psychiatric treatment, and should cross reference the CRPD Committee's General Comment No. 1, paragraphs 41 and 42, and General Comment No. 3 in this regard.²⁸ Finally, this paragraph should contain a caveat that the understanding of violence against women continues to evolve and that the list contained in this updated General Recommendation is not exhaustive.

B. Intersectional Discrimination and Gender-Based Violence

As the CEDAW Committee recognized in its General Recommendation No. 28, “[i]ntersectionality is a basic concept for understanding the scope of the general obligations of States parties contained in article 2,”²⁹ whose condemnation of discrimination against women is the basis for the CEDAW Committee's prohibition on gender-based violence.³⁰ In order to ensure freedom from intersecting or multiple forms of discrimination—based on, for instance, sex or gender and disability—states must “adopt and pursue policies and programmes designed to eliminate such occurrences, including, where appropriate, temporary special measures...”³¹

With this background in mind, the CEDAW Committee should consider adding a paragraph to the updated General Recommendation No. 19—in addition to or in place of the addition recommended above—that describes the particular ways that intersectional discrimination affects violence as perpetuated against women with disabilities. This information will help guide states on the measures they need to take to ensure that women with disabilities are free from violence, including by addressing its unique forms, causes and consequences. This amendment is in line with the goal of the updated General Recommendation No. 19 to provide states “with further and comprehensive guidance aimed at accelerating the elimination of gender-based violence against women.”³²

For example, the CEDAW Committee has previously recommended through its General Recommendation No. 18 on disabled women that states provide information about the special measures

they have taken to ensure the rights of women with disabilities, including “to ensure that they have equal access to education and employment, health services and social security, and to ensure that they can participate in all areas of social and cultural life.”³³ In its other General Recommendations, the CEDAW Committee has also frequently included paragraphs and provisions describing abuses against women with disabilities and making recommendations targeted at ensuring their rights.³⁴ This approach would be welcome in the updated General Recommendation No. 19, as violence against women disproportionately affects women with disabilities and manifests in unique ways.

WEI therefore recommends that the CEDAW Committee insert a paragraph or subparagraph, such as the following, after paragraph 11 on intersectional discrimination:

Women with disabilities experience gender-based violence—including sexual violence and domestic violence—at higher rates and in forms that are often unique from those experienced by other women. As described by the Committee on the Rights of Persons with Disabilities in its General Comment No. 3 on women and girls with disabilities, these unique forms of violence include: forced institutionalization and abuses that occur in residential care homes and psychiatric hospitals; forced and coerced sterilization, contraception, and abortion, including when women with disabilities are formally or informally deprived of legal capacity and do not provide consent; violence at the hands of caregivers and others on whom women with disabilities depend to help take care of daily needs and interact with the world; and abandonment and neglect by family members and intimate partners. These abuses often stem from discrimination and stereotypes about women with disabilities, including those that infantilize them or portray them as asexual, hypersexual, unmarried, or incapable of being good parents. Shelters and social services designed to assist women who are victims of violence are also less likely to be accessible to them, while justice mechanisms—including the police and courts—frequently do not take seriously their complaints of violence or question their credibility, based on perceptions about their legal capacity or because they are not provided with reasonable accommodations for communications. States have an obligation under CEDAW to prohibit, prevent, and prosecute the forms of violence against women that women with disabilities uniquely or disproportionately experience and ensure that women with disabilities have access to support services and to justice mechanisms.

IV. Recommendations concerning Specific Paragraphs

In line with the recommendations outlined above, WEI also has the following comments related to particular existing paragraphs of the draft update to General Recommendation No. 19, so as to better include issues that affect women with disabilities:

- Introduction: In the introductory section, the CEDAW Committee should cross-reference other important treaties and General Comments and Recommendations that address gender-based violence. In particular, the CEDAW Committee should cross-reference CRPD Article 16 on violence, exploitation, and abuse, as well as the CRPD Committee’s General Comment No. 3 on the rights of women and girls with disabilities, both of which contain important information for states to consider when implementing the right to be free from violence.³⁵
- Paragraph 12: This paragraph should explicitly include intimate partners and caregivers as persons who can commit violence against women. It should also mention that state- and privately-run institutions, psychiatric hospitals, and residential care homes are places where gender-based violence can occur.³⁶
- Para. 14(c): This paragraph on judicial responses to gender-based violence should reference the need to make justice mechanisms accessible for all, including persons with disabilities. This requires that courthouses and courtrooms are physically accessible, that information is provided in accessible formats, that reasonable accommodations, such as sign language interpreters, are provided, and that persons with disabilities have access to alternative methods of testifying in court, including via videolink. Furthermore, as the Committee against Torture has recognized,

“afford[ing] equal weight to the testimony of women and girls” is essential to ensuring access to justice for victims of gender-based violence.³⁷ This paragraph should expressly address states’ obligations to combat stereotypes that may lead courts to question the credibility of women’s testimony, and particularly that of women with other intersecting identities, including women with disabilities. Finally, this paragraph should enumerate that states should remove any legal restrictions on the ability of women with disabilities to testify in court, including restrictions based on legal capacity.³⁸

- Prevention:
 - Paragraph (c)(i): The positive portrayals mandated in this paragraph, meant to challenge stereotypes about the roles of women and men, should also challenge stereotypes about different groups of women, including women with disabilities, such as that they are asexual, hypersexual, incapable, unmarriageable, or unable to be good parents.³⁹
 - Paragraph (j)(i): This paragraph on laws that encourage, justify, or tolerate gender-based violence should also include many of the laws that affect women with disabilities in particular and allow violence against them to take place. These include laws that strip women with disabilities of legal capacity, forcibly place women with disabilities in institutions, and allow for forced or coerced medical interventions—such as involuntary sterilization, contraception, or abortion and forced psychiatric treatment—with the consent of parents or guardians but without the woman’s consent.⁴⁰
 - Paragraph (l): In this provision surrounding laws on rape, the CEDAW Committee should also recommend that states ensure these laws do not reinforce stereotypes about women with disabilities that, for instance, they cannot consent to sex.⁴¹
- Protection and Redress:
 - Paragraph a(ii): This paragraph should also emphasize the need to ensure that women are economically independent—through employment, housing assistance, or other social supports—so that they may be able to leave abusive situations.⁴²
 - Paragraph a(iii): When addressing the accessibility of support services for victims of violence, the General Recommendation should specifically indicate that support services need to be made accessible for women with disabilities, as otherwise states and service providers may overlook their particular reasonable accommodation needs.⁴³
 - Paragraph a(iv): This paragraph about protecting women from violence in institutional settings should contain more details about how states should provide this protection. Protective measures should include adequate and independent monitoring mechanisms for institutions, accessible information and education for residents about their rights under the law, clear and uncomplicated procedures for reporting violence, and the end of arbitrary detention based on disability.⁴⁴
 - Paragraph d: This paragraph should contain information about how to make information accessible to women with disabilities. This would include providing information in Braille, through sign-language, through easy-to-read versions, and through other formats, as well as providing translation when needed and allowing women with disabilities to have the assistance of a support person, when requested.⁴⁵

Thank you for your consideration of these recommendations to the *Draft General Recommendation No. 19 (1992): accelerating elimination of gender-based violence against women*. Should you have any questions or comments on these recommendations, please do not hesitate to contact WEI president, Stephanie Ortoleva, at President@WomenEnabled.org.

¹ This submission addresses the situation of women and girls with disabilities throughout the lifecycle. As such, any reference to “women with disabilities” should be interpreted to include girls with disabilities unless otherwise indicated.

² WORLD HEALTH ORGANIZATION AND WORLD BANK, *WORLD REPORT ON DISABILITY 28-29* (2011).

³ UN Special Rapporteur on Violence against Women, *Report of the Special Rapporteur on violence against women, its causes and consequences*, ¶ 31, U.N. Doc. A/67/227 (2012) [hereinafter SRVAW, *Report on women with disabilities*].

⁴ UNITED STATES AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID), *UNITED STATES STRATEGY TO PREVENT AND RESPOND TO GENDER-BASED VIOLENCE GLOBALLY 7* (Aug. 10, 2012), <http://www.state.gov/documents/organization/196468.pdf>. It is worth noting that no global data exists on the incidence of such violence, and studies draw on different sources of data.

⁵ SRVAW, *Report on women with disabilities*, *supra* note 3, ¶ 31.

⁶ STEPHANIE ORTOLEVA AND HOPE LEWIS, *FORGOTTEN SISTERS—A REPORT ON VIOLENCE AGAINST WOMEN WITH DISABILITIES: AN OVERVIEW OF ITS NATURE, SCOPE, CAUSES AND CONSEQUENCES* Sect. II (2012).

⁷ CRPD Committee, *General Comment No. 3: Article 6: Women and girls with disabilities*, ¶ 30, U.N. Doc. CRPD/C/GC/3 (2016) [hereinafter CRPD Committee, *Gen. Comment No. 3*].

⁸ *Id.*

⁹ *See, e.g.*, United Nations Population Fund, *An Assessment of the State of Violence against Women in Fiji* (2008).

¹⁰ For example, one study found that only 6% of domestic violence shelters surveyed in the United States indicated they could handle the personal care needs of a woman with a disability requiring assistance (C.A. Howland, et al., *Programs delivering abuse intervention services to women with disabilities*, CROWD: Houston (2001)), while another study noted that only 35% of responding shelters could accommodate survivors of gender-based violence across a range of disabilities, including those with physical/mobility, cognitive, visual, and hearing impairments (ELEANOR LYON, SHANNON LANE, & ANNE MENARD, *MEETING SURVIVORS’ NEEDS: A MULTI-STATE STUDY OF DOMESTIC VIOLENCE SHELTER EXPERIENCES 7* (2008)). A 2014 European Union and University of Leeds study found that the accessibility of support services in the UK for women with disabilities who were victims of violence varied greatly by disability, and that many of these services were not fully accessible. (European Union and University of Leeds, et al., *ACCESS TO SPECIALIZED VICTIM SUPPORT SERVICES FOR WOMEN WITH DISABILITIES WHO HAVE EXPERIENCED VIOLENCE: FINAL SHORT REPORT 23* (2014), available at http://www.gla.ac.uk/media/media_394354_en.pdf).

¹¹ Karen Nutter, *Domestic Violence in the Lives of Women with Disabilities: No (Accessible) Shelter from the Storm*, 13 S. CAL. REV. L. & WOMEN’S STUD. 329, 345 (2004).

¹² CRPD Committee, *Gen. Comment No. 3*, *supra* note 7, ¶ 52.

¹³ *Id.*, ¶ 17(a).

¹⁴ SRVAW, *Report on women with disabilities*, *supra* note 3, ¶ 41.

¹⁵ CEDAW Committee, *Concluding Observations: Hungary*, ¶ 20, U.N. Doc. CEDAW/C/HUN/CO/7-8 (2013).

¹⁶ *Id.*, ¶ 32.

¹⁷ CEDAW Committee, *Concluding Observations: Sweden*, ¶ 40, U.N. Doc. CEDAW/C/SWE/CO/7 (2008).

¹⁸ CEDAW Committee, *Concluding Observations: Norway*, ¶ 23, U.N. Doc. CEDAW/C/NOR/CO/8 (2012); *Concluding Observations: Germany*, ¶ 43, U.N. Doc. CEDAW/C/DEU/CO/6 (2009); *Concluding Observations: Sweden*, ¶ 28, U.N. Doc. CEDAW/C/SWE/CO/7 (2008).

¹⁹ CEDAW Committee, *Concluding Observations: Italy*, ¶ 27(a), U.N. Doc. CEDAW/C/ITA/CO/6 (2011); *Concluding Observations: Sweden*, ¶ 41, U.N. Doc. CEDAW/C/SWE/CO/7 (2008).

²⁰ CEDAW Committee, *Concluding Observations: Hungary*, ¶ 33, U.N. Doc. CEDAW/C/HUN/CO/7-8 (2013).

²¹ CEDAW Committee, *Concluding Observations: Sweden*, ¶ 29, U.N. Doc. CEDAW/C/SWE/CO/7 (2008).

²² CEDAW Committee, *General Recommendation No. 33 on women’s access to justice*, ¶¶ 13 & 17(g), U.N. Doc. CEDAW/C/GC/33 (2015).

²³ *See, e.g.*, CRPD Committee, *Gen. Comment No. 3*, *supra* note 7, ¶ 32.

²⁴ *Id.*

²⁵ For instance, the CEDAW Committee, in its General Recommendation No. 19 on violence against women, recognized that “[c]ompulsory sterilization or abortion adversely affects women’s physical and mental health, and infringes the right of women to decide on the number and spacing of their children.” (CEDAW Committee, *General Recommendation No. 19: Violence against women*, (11th Sess., 1992), in *Compilation of General Comments and General Recommendations Adopted by Human Rights Treaty Bodies*, ¶ 22, U.N. Doc. HRI/GEN/1/Rev.9 (Vol. II) (2008) [hereinafter CEDAW Committee, *Gen. Recommendation No. 19*]). Furthermore, in its decision on the

individual complaint in *A.S. v. Hungary*, the CEDAW Committee cited General Recommendation No. 19 in deciding that the sterilization of a Romani woman without her free and informed consent was a violation of Article 16 of CEDAW (*A.S. v. Hungary*, CEDAW Committee, Commc'n No. 4/2004, ¶ 11.4, U.N. Doc. CEDAW/C/36/D/4/2004 (2006)). The UN Special Rapporteur on Torture, Juan Mendez, has also classified forced sterilization of women, including women with disabilities, as “an act of violence, a form of social control, and a violation of the right to be free from torture and other cruel, inhuman, or degrading treatment or punishment.” (UN Special Rapporteur on Torture, *Report of the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment*, Juan E. Méndez, ¶ 48, U.N. Doc. A/HRC/22/53 (2013) [hereinafter SRT, *Torture in healthcare settings report*). Additionally, the former Special Rapporteur on Violence against Women, Rashida Manjoo, found in her report on women with disabilities that forced institutionalization, forced medication, and denial of exercise of legal capacity can constitute forms of violence. (SRVAW, *Report on women with disabilities*, *supra* note 3, ¶ 38). Juan Mendez has further classified these actions as violations of the right to be free from torture or ill-treatment. (SRT, *Torture in healthcare settings report*, *supra* note 25, ¶¶ 57-70).

²⁶ See, e.g., CRPD Committee, *General Comment No. 1: Equal recognition before the law*, ¶ 35, U.N. Doc. CRPD/C/GC/1 (2014) [hereinafter CRPD Committee, *Gen. Comment No. 1*]; CRPD Committee, *Gen. Comment No. 3*, *supra* note 7, ¶ 44; CRPD Committee, *Guidelines on article 14 of the Convention on the Rights of Persons with Disabilities: The right to liberty and security of the person* (2015); SRT, *Torture in healthcare settings report*, *supra* note 25, ¶¶ 64, 67-60 & 81.

²⁷ See, e.g., CRPD Committee, *Gen. Comment No. 3*, *supra* note 7, ¶¶ 31 & 32.

²⁸ See, e.g., CRPD Committee, *Gen. Comment No. 1*, *supra* note 26, ¶¶ 41 & 42; *Gen. Comment No. 3*, *supra* note 7, ¶ 51.

²⁹ CEDAW Committee, *General Recommendation No. 28 on the core obligations of States Parties under Article 2 of the Convention on the Elimination of All Forms of Discrimination against Women*, ¶ 18, U.N. Doc. CEDAW/C/GC/28 (2010).

³⁰ See, e.g., *id.*, ¶ 19.

³¹ *Id.*, ¶ 18.

³² CEDAW Committee, *Draft General Recommendation No. 19 (1992): accelerating elimination of gender-based violence against women*, ¶ 5, U.N. Doc. CEDAW/C/GC/19/Add.1 (2016).

³³ CEDAW Committee, *General Recommendation No. 18: Disabled women* (1991).

³⁴ See, e.g., CEDAW Committee, *General Recommendation No. 24: Article 12 of the Convention (women and health)*, (20th Sess., 1999), in *Compilation of General Comments and General Recommendations Adopted by Human Rights Treaty Bodies*, ¶ 25, U.N. Doc. HRI/GEN/1/Rev.9 (Vol. II) (2008); *General Recommendation No. 27 on older women and protection of their human rights*, ¶¶ 16, 19, 20, 33, 36, 37, 45 & 46, U.N. Doc. CEDAW/C/GC/27 (2010); *General Recommendation No. 33 on women's access to justice*, ¶ 16(g), U.N. Doc. CEDAW/C/GC/33 (2015); *General Recommendation No. 34 (2016) on the rights of rural women*, ¶¶ 14, 15, 39(a), 43(a) & 43(h), U.N. Doc. CEDAW/C/GC/34 (2016).

³⁵ See *Convention on the Rights of Persons with Disabilities (CRPD)*, adopted Dec. 13, 2006, art. 16, G.A. Res. A/RES/61/106, U.N. GAOR, 61st Sess., U.N. Doc. A/61/611, (entered into force May, 3 2008); CRPD Committee, *Gen. Comment No. 3*, *supra* note 7, ¶¶ 29-37.

³⁶ See CRPD Committee, *Gen. Comment No. 3*, *supra* note 7, ¶¶ 33 & 45.

³⁷ CAT Committee, *General Comment No. 3: Implementation of article 14 by States parties*, ¶ 33, U.N. Doc. CAT/C/GC/3 (2012).

³⁸ See, e.g., CEDAW Committee, *General Recommendation No. 33 on women's access to justice*, ¶¶ 13 & 17(g), U.N. Doc. CEDAW/C/GC/33 (2015); CRPD Committee, *Gen. Comment No. 1*, *supra* note 26, ¶¶ 38-39; CRPD Committee, *General Comment No. 2: Article 9: Accessibility*, ¶ 37, U.N. Doc. CRPD/C/GC/2 (2014); CRPD Committee, *Gen. Comment No. 3*, *supra* note 7, ¶¶ 17(a) & 52.

³⁹ See CRPD Committee, *Gen. Comment No. 3*, ¶ 30.

⁴⁰ See *id.*, ¶¶ 31 & 32.

⁴¹ See *id.*, ¶ 30.

⁴² CEDAW Committee, *Gen. Recommendation No. 19*, *supra* note 25, ¶ 23 (“[I]ack of economic independence forces many women to stay in violent relationships”).

⁴³ See CEDAW Committee, *Concluding Observations: Sweden*, ¶ 29, U.N. Doc. CEDAW/C/SWE/CO/7 (2008); CRPD Committee, *General Comment No. 2: Article 9: Accessibility*, ¶ 37, U.N. Doc. CRPD/C/GC/2 (2014).

⁴⁴ See CRPD Committee, *Guidelines on article 14 of the Convention on the Rights of Persons with Disabilities: The right to liberty and security of the person* (2015); UN Special Rapporteur on Violence against Women, *Pathways to, conditions and consequences of incarceration for women*, U.N. Doc. A/68/340 (2013).

⁴⁵ See CRPD Committee, *General Comment No. 2: Article 9: Accessibility*, ¶¶ 21 & 38, U.N. Doc. CRPD/C/GC/2 (2014).