

# THE UPR PROJECT AT BCU

## Submitted by:

The UPR Project at BCU  
Centre for Human Rights, School of Law  
Birmingham City University

## Submitted to:

Mexico's Universal Periodic Review  
Fourth Cycle  
45<sup>th</sup> Session of the UPR Working Group  
*Jan-Feb 2024*

## About the UPR Project at BCU:

Birmingham City University's Centre for Human Rights was created in 2014 to promote human rights, ensure access to justice, and enhance the rule of law around the world. We seek to achieve this through leading research, education, and consultancy. We submit expert reports to international human rights regions, provide advisory services to governments and nongovernmental organisations, and draft legal opinions and file legal briefs in domestic courts and international human rights courts.

The Centre for Human Rights established the UPR Project in 2018 as part of our consultancy service. We engage with the Human Rights Council's review process in offering support to the UPR Pre-sessions, providing capacity building for UPR stakeholders and National Human Rights Institutions, and the filing of stakeholder reports in selected sessions. The UPR Project is designed to help meet the challenges facing the safeguarding of human rights around the world, and to help ensure that UPR recommendations are translated into domestic legal change in member state parliaments. We fully support the UPR ethos of encouraging the sharing of best practice globally to protect everyone's human rights. The UPR Project at BCU engages with the UPR regularly as a stakeholder and is frequently cited by the OHCHR. You can read more about the UPR Project here: [www.bcu.ac.uk/law/research/centre-for-human-rights/projects-and-consultancy/upr-project-at-bcu](http://www.bcu.ac.uk/law/research/centre-for-human-rights/projects-and-consultancy/upr-project-at-bcu)

## Compiled by:

**Lead Author:** Dr Alice Storey & Dr Rafael Quintero **Contributing Authors:** Dr Amna Nazir & Prof. Jon Yorke **Thank you to:** LUMS University student, Haanya Channa, and Birmingham City University student, Bethany Morgan, for their research assistance.

## Contact:

**Dr Alice Storey** (Lead Academic of the UPR Project at BCU) Email: [Alice.Storey@bcu.ac.uk](mailto:Alice.Storey@bcu.ac.uk)  
Address: Birmingham City University, School of Law, Curzon Building, 4 Cardigan Street, Birmingham, B4 7BD, UK.

## INTRODUCTION

1. There are nine core international human rights treaties.<sup>1</sup> Mexico is a party to all nine, for which it should be commended.<sup>2</sup> This includes the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and, in line with CEDAW's protections, this Stakeholder Report focuses upon protecting women from domestic abuse.
2. In this submission, we encourage Mexico to commit to improving its human rights protection and promotion by engaging meaningfully with the fourth cycle of the UPR in 2024. This includes giving full and practical consideration to all recommendations made by Member States, effectively implementing the recommendations Mexico accepts, and actively engaging with civil society throughout the process.
3. We make recommendations to the Government of Mexico on this key issue, implementation of which would see the State move towards achieving Sustainable Development Goal 5 which aims for "gender equality and empowering all women and girls."
4. Domestic abuse is defined as being "all acts of physical, sexual, psychological or economic violence that occur within the family or domestic unit or between former or current spouses or partners, whether or not the perpetrator shares or has shared the same residence with the victim."<sup>3</sup> Domestic abuse is a pervasive human rights concern in Mexico, particularly for women. In August 2022, Mexico's National Institute of Statistics and Geography (INEGI) reported that "[v]iolence against women and girls in Mexico has increased over the last five years" as an estimated "70% of 50.5 million women and girls aged over 15 have experienced some kind of violence, up four percentage points since last time it ran the survey in 2016."<sup>4</sup> This includes domestic abuse, with femicide being a particularly grave concern.
5. This Stakeholder Report refers to 'domestic abuse' throughout, in recognition of the fact that domestic abuse includes much more than just violence. However, domestic abuse is also referred to as 'domestic violence' or 'intimate partner violence' and is included under the broad umbrella terms 'violence against women and girls' and 'gender-based violence.'

### **A. Normative and Institutional Framework of Mexico**

#### *International and Regional Protections*

6. CEDAW<sup>5</sup> is key when considering the protection of women from domestic abuse. In particular, General Recommendation 19 passed in 1992 provides that:

‘The Convention in article 1 defines discrimination against women. The definition of discrimination includes gender-based violence, that is, violence that is directed against a woman because she is a woman or that affects women disproportionately. It includes acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion and other deprivations of liberty.’<sup>6</sup>

7. General Recommendation 35 from 2017 updated General Recommendation 19 to provide “further guidance aimed at accelerating the elimination of gender-based violence against women.”<sup>7</sup> Mexico has been a party to CEDAW since 1981.<sup>8</sup>
8. There are a number of other international human rights agreements and policies related to domestic abuse, in particular the Declaration on the Elimination of Violence Against Women 1993.<sup>9</sup> Also pertinent are the Beijing Declaration and Platform for Action 1995,<sup>10</sup> the UN Commission on Human Rights Resolution 1994/945,<sup>11</sup> and the Commission on the Status of Women.<sup>12</sup>
9. In 1998, Mexico became a party to the Inter-American Convention on the Prevention, Punishment and Eradication of Violence Against Women, also known as the Convention of Belem do Para, which aims to eliminate violence against women, including domestic abuse.

#### *Domestic Protections*

10. Mexico is a federal republic comprised of 32 federal entities, with three levels of Government: federal, state, and municipal. This involves a power sharing arrangement between the levels of government, and each federal entity has its own constitution, laws, and criminal and civil codes.
11. In terms of federal law, Article 343 of the Mexican Federal Penal Code defines “family violence” as “acts or behaviors of dominance, control or assault of physical, psychological, patrimonial, or economic to any person [who] have been joined by link [in] marriage, of kinship due to consanguinity, affinity or civil, concubinage, or a relationship of a couple inside or outside the family home.”<sup>13</sup> However, each federal entity has its own specific laws and regulations on family violence as outlined in their respective Penal Codes.<sup>14</sup>
12. In 2007, the government enacted the General Law for Women’s Access to a Life Free from Violence (Ley General de Acceso de las Mujeres a una Vida Libre de Violencia) (‘LGAMVLV’). In particular, a key aim of the LGAMVLV is to establish coordination between the three levels of government, “to prevent, punish an eradicate violence against women.”<sup>15</sup> This should be achieved through codifying all forms of violence against women across all states and providing adequate measures for the prevention of domestic abuse in line with the international treaties ratified by the federal

government.<sup>16</sup> UN Women praised this, noting that it “contextualizes violence against women as a form of discrimination and recognizes the continuum of violence perpetrated against them.”<sup>17</sup> While LGAMVLV established a duty to guarantee the dignity and security of victims in cases of domestic abuse,<sup>18</sup> implementation relies on coordination between state institutions, making it difficult to track progress and enforcement across Mexico.

## **B. Implementation of Recommendations from Cycle Three in 2018**

13. In 2018, Mexico received 264 recommendations, and supported 262 of them. It is commendable that the Mexican government accepted such a high proportion of recommendations, but it is equally important that those accepted recommendations are implemented in practice. Of the 264 recommendations received, 30 were made regarding domestic abuse or a related issue, such as violence against women and girls. All were accepted and below is a consideration of the action taken on each recommendation.

### *Combat Violence Against Women and Girls (VAWG) and Gender-Based Violence (GBV)*

14. 21 recommendations referred to combatting VAWG and GBV, focusing on points such as the need to “investigate” VAWG and “develop actions” or “step up the fight.” (Australia (para 132.37); Liechtenstein (para 132.45 and para 132.210); Bahrain (para 132.64); Lithuania (para 132.76 and para 132.211); Guyana (para 132.192); Sri Lanka (para 132.198); Cuba (para 132.201 and para 132.202); Ecuador (para 132.203); Estonia (para 132.204); Albania (para 132.207); Italy (para 132.208); Japan (132.209); Malaysia (para 132.212); Nepal (para 132.213); Philippines (para 132.215); Portugal (para 132.216); Armenia (para 132.218); Syrian Arab Republic (para 132.222)).

15. Whilst such recommendations are welcomed, it is crucial that they remain specific and measurable in order to assess the level of implementation. Broad recommendations, whilst easy to accept, lack any impetus to bring about real change.<sup>19</sup> It is recommended that States adopt a SMART approach to recommendations as recognised by UPR Info.<sup>20</sup> In particular, when referring to VAWG, Member States should specify the type of violence they are referring to and the key action the State should take.<sup>21</sup>

16. Nevertheless, it can be concluded that **these recommendations have not been implemented**, given the reports that, in 2021, authorities “used illegal force and sexual violence” against “women who were peacefully protesting against gender-based violence.”<sup>22</sup> This not only undermines the government’s assertions that it is seeking to prevent VAWG, but also violates multiple human rights including the freedom of expression. Member States are urged to raise this alarming issue during the fourth cycle.

## *Domestic Abuse*

17. Two recommendations were focused on domestic abuse. **Serbia (para 132.195)** asked Mexico to “[c]ontinue fighting domestic violence against women.” **Republic of Korea (para 132.219)** made a more specific recommendation to “[s]trengthen governmental efforts and resources to combat and investigate violence against women, including domestic violence.” While this emphasis specifically on domestic abuse is welcomed, it would be even more beneficial for Member States to recommend on implementing such laws in practice, whilst also taking an ‘intersectional approach,’<sup>23</sup> for example, considering the interlinked effects of socioeconomic factors and domestic abuse, or race and domestic abuse.<sup>24</sup>

## *Femicide*

18. Femicide (the intentional killing of women and girls because of their gender) is a significant issue in Mexico, with statistics for 2021 showing that over 1,000 reported femicides were perpetrated across Mexico, the second-highest figure in Latin America.<sup>25</sup> UN Women found that “[w]omen and girls are most likely to be killed by those closest to them” making this the most serious form of domestic abuse.<sup>26</sup> In Mexico, femicide is legally recognised as a specific type of homicide.<sup>27</sup>
19. Three recommendations focused upon femicide in 2018. **Belgium (para 132.66)** asked Mexico to “[c]onduct thorough, independent and impartial investigation into femicide ensuring that the perpetrators are brought to justice and guaranteeing reparation for victims and their families for the harm suffered.” **France (para 132.205)** suggested the government should “systemize the application of the investigation protocol of the crime of femicide” and **Canada (para 132.67)** recommended to “[d]evelop and effectively implement guidelines for the investigation of femicide in those states where they do not yet exist.”
20. While the government has taken some action, for example, see paragraphs 21-24 below regarding the Gender Violence Alert System, **these recommendations have not been implemented.** Firstly, statistics show that femicide increased across Mexico “by 137% between the years 2015-2021.”<sup>28</sup> Secondly, there continues to be issues around investigating femicides and seeking justice for victims. In fact, “[t]he Latin American and Caribbean Committee for the Defense of Women's Rights (CLADEM) claims that 92 percent of femicides go unpunished in the region.”<sup>29</sup> Moreover, while “the 32 federal states [have] adopted the nationwide definition of the crime of femicide,”<sup>30</sup> the way in which femicide is investigated and punished differs. For instance, while “the federal femicide law penalizes government officials” for non-enforcement of the law, the state of Veracruz does not have the same level of accountability.<sup>31</sup>

## *Effective Implementation of Legislation and Policy*

21. **Moldova (para 132.220)** and **Spain (para 132.221)** noted the importance of implementing the LGAMVLV in practice. Related to this were recommendations based upon a specific aspect of the LGAMVLV: the Gender Violence Alert System. Articles 35 and 36 of the LGAMVLV set out the requirements for a Gender Violence Alert System (AVGM), which was enacted in 2015 and has been activated across multiple Mexican states.<sup>32</sup> The aims of the AVGM are “to co-ordinate the efforts, instruments, politics, services, and inter-institutional actions for the prevention, attention, sanction and eradication of the violence against women.”<sup>33</sup> Whilst this covers all types of VAWG, femicide is a particular focus of this tool.<sup>34</sup>
22. **Austria (para 132.200)** focused on the need to “[e]valuate and create the necessary regulations to eliminate legal and procedural uncertainties in the application of the gender violence alert mechanism.” **France** (noted above) asked Mexico to “[a]ssess and strengthen the alert mechanism for gender violence.” **Norway (para 132.214)** recommended to “[i]ntensify its efforts to reduce the high levels of gender-based violence against women, including by evaluating and modifying the procedure for activating the gender violence alert mechanism in broad consultation with civil society.” **Spain’s** recommendation (noted above), also highlighted the need to “assess the application of the early warning mechanism for gender violence against women.”
23. **These recommendations have not been implemented.** Alan Jair Garcia-Flores’s 2020 study on the AVGM has found that the design of the mechanism demonstrates “ambivalence” towards the purported “objectives and purpose as an emergency mechanism” and a fundamental limitation to the AVGM is the lack of engagement with civil society organisations in the design and practice of the mechanism.<sup>35</sup> Given reports that law enforcement in Mexico are aggravators in the “rise in killings of women”,<sup>36</sup> this is a timely moment for the Mexican government to reconsider its use of the AVGM to ensure it is functioning effectively to actively protect women from violence.

### **C. Further Points for Mexico to Consider**

#### *COVID-19 and Domestic Abuse*

24. The COVID-19 pandemic has been disastrous for those experiencing domestic abuse. The UN Special Rapporteur on Violence Against Women (SRVAW) found that it was women from already marginalised backgrounds who suffered the most in terms of domestic abuse during the lockdowns of the pandemic, including “minorities, indigenous, Afrodescendant, migrant and rural communities, older women, women and girls with disabilities, homeless women, and women deprived of liberty and victims of trafficking.”<sup>37</sup> In March 2020, Mexico’s “emergency call centres were flood with more than 26,000 reports of violence against women, the highest since the hotline was

created.”<sup>38</sup> Yet, when confronted with these statistics, Mexican President Lopez Obrador stated that “[n]inety per cent of those calls that you’re referring to are fake” and was “adamant that the [pandemic had] not made life more dangerous for victims of domestic violence.”<sup>39</sup> This is extremely concerning and undermines ongoing governmental activities, such as the implementation of LGAMVLV and effective operation of the AVGM.

25. Moreover, in direct opposition to President Lopez Obrador’s statements, the World Health Organization (WHO) has found that “[v]iolence against women tends to increase during every type of emergency.”<sup>40</sup> The WHO has stated that governments “must include essential services to address violence against women in preparedness and response plans for COVID-19, fund them, and *identify ways to make them accessible in the context of physical distancing measures.*”<sup>41</sup> Therefore, thought must be given to how the Mexican government can best deal with the effects of a national emergency, such as the COVID-19 outbreak and lockdowns, on domestic abuse victims. This should be raised during Mexico’s fourth cycle UPR and other Member States could share best practice on how they dealt with this issue.
26. UN Secretary-General, António Guterres, specifically mentioned the “horrifying global surge” of domestic abuse during the pandemic, noting that “[h]ealthcare providers and police are overwhelmed and understaffed” and “local support groups are paralyzed or short of funds. Some domestic violence shelters are closed; others are full.”<sup>42</sup> This is a particular issue in Mexico. Despite the LGAMVLV requiring states to “allocate a sufficient portion of their budget to establishing shelters,”<sup>43</sup> the government made cuts to funding for such shelters in 2019 and 2020, leading to a rise in femicides and other violence against women.<sup>44</sup> Along with the comments from President Lopez Obrador, this is an especially troubling time for women facing domestic abuse, femicide, and wider violence against women, and we urge Member States to make this human rights issue a priority during Mexico’s review.

#### **D. Recommendations for Action by Mexico**

We recommend that, before the next cycle of review, the Government of Mexico should:

- i. Fully engage with the recommendations made during the UPR regarding domestic abuse, providing clear responses to recommendations and setting out specific plans for implementation.
- ii. Provide up-to-date and accurate statistics from all federal entities regarding investigations and prosecutions of domestic abuse cases across the country during the fourth cycle, to allow Member States and civil society to fully assess the implementation of domestic abuse recommendations.

- iii. Ensure that freedom of expression is upheld across the country, by educating Mexican authorities on the relevant international and regional protections. Any member of the authorities that is found to be violating the right to freedom of expression, or assaulting people taking part in a peaceful protest, should be suspended from their duties and a full and transparent investigation should be initiated.
- iv. Work with federal entities and municipalities to ensure there is a consistent approach to investigating femicides and punishing perpetrators, seeking out and using models of best practice.
- v. In line with recommendations made in the third cycle, reassess the efficacy of the Gender Violence Alert System, making any necessary amendments to ensure it functions as intended and involving civil society organisations in its re-design and implementation.
- vi. Reverse budget cuts and properly fund support services, to allow victims of domestic abuse to access shelters and refuges, as well as any relevant treatment. The Mexican Government should provide a publicly available action plan on how it will achieve this.

---

<sup>1</sup> UN OHCHR, 'The Core International Human Rights Instruments and their Monitoring Bodies' <[www.ohchr.org/EN/ProfessionalInterest/Pages/CoreInstruments.aspx](http://www.ohchr.org/EN/ProfessionalInterest/Pages/CoreInstruments.aspx)>.

<sup>2</sup> See, OHCHR, 'Status of Ratification Interactive Dashboard' <<https://indicators.ohchr.org>>.

<sup>3</sup> Council of Europe, *The Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence*, November 2014, ISBN 978-92-871-7990-6.

<sup>4</sup> Reuters, 'Violence against women in Mexico rises to over 70%, study finds' (31 August 2022) <[www.reuters.com/world/americas/violence-against-women-mexico-rises-over-70-study-finds-2022-08-31/](http://www.reuters.com/world/americas/violence-against-women-mexico-rises-over-70-study-finds-2022-08-31/)>.

<sup>5</sup> UN General Assembly, 'Convention on the Elimination of All Forms of Discrimination Against Women' (18 December 1979) UNTS vol 1249.

<sup>6</sup> Committee on the Elimination of Discrimination Against Women, 'General Recommendation No. 19: Violence against women', Eleventh session (1992), contained in A/47/38, para 2.

<sup>7</sup> Committee on the Elimination of Discrimination against Women, 'General Recommendation No. 35 on gender-based violence against women, updating General Recommendation 19' (14 July 2017), CEDAW/C/GC/35.

<sup>8</sup> Convention on the Elimination of All Forms of Discrimination: Reservations <[https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg\\_no=IV-8&chapter=4&clang=\\_en#24](https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg_no=IV-8&chapter=4&clang=_en#24)> accessed 31 March 2023.

<sup>9</sup> Declaration on the Elimination of Violence Against Women 1993.

<sup>10</sup> Beijing Declaration and Platform for Action 1995, Art 124-b.

<sup>11</sup> UN Commission on Human Rights Resolution 1994/945.

<sup>12</sup> Commission on the Status of Women.

<sup>13</sup> Código Penal Federal Article 343.

<sup>14</sup> A key example is Mexico City's Penal Code. According to Article 220, family violence is any action or omission exerted by any individual that involves physical, psychoemotional, sexual, economic, property, or reproductive rights violence. This can occur or have occurred inside or outside the home or place of residence, and is directed towards a range of individuals. These include the spouse or ex-spouse, the concubine or ex-concubine, the cohabitant or ex-cohabitant, blood relatives in a direct ascending or descending line without degree limitation, collateral blood or related relatives up to the fourth degree, the adopter or adoptee, the incapacitated individual over whom they have guardianship or custodianship, and the person with whom they have established a cohabitation partnership. Family violence is punishable by one to six years' imprisonment and shall forfeit any rights they she may have in respect of the victim, including rights of inheritance, parental authority, guardianship and maintenance.

- <sup>15</sup> Ley General de Acceso de las Mujeres a una Vida Libre de Violencia Article 1.
- <sup>16</sup> *ibid* Article 2.
- <sup>17</sup> Carmen Manaute Oliva, ‘Mexico Case Study: Steps on the Pathway to No Impunity’ (UN Women 2016).
- <sup>18</sup> Ley General de Acceso de las Mujeres a una Vida Libre de Violencia (n 15) Articles 7-9.
- <sup>19</sup> Amna Nazir, ‘The Universal Periodic Review and the Death Penalty: A Case Study of Pakistan’ (2020) 4(1) *RSIL Law Review* 126, 153; Alice Storey, ‘Challenges and Opportunities for the UN Universal Periodic Review: A Case Study on Capital Punishment in the USA’ (2021) 90 *UMKC L Rev* 129, 148-49.
- <sup>20</sup> See UPRinfo, ‘For impact on the ground the UPR needs SMART recommendations’ <<https://www.upr-info.org/en/news/for-impact-on-the-ground-the-upr-needs-smart-recommendations>> (21 October 2015).
- <sup>21</sup> Alice Storey, ‘Improving Recommendations from the UN’s Universal Periodic Review: A Case Study on Domestic Abuse in the UK’ forthcoming Spring 2023, *Pace International Law Review*.
- <sup>22</sup> Amnesty International, ‘Mexico: Authorities used illegal force and sexual violence to silence women protesting against gender-based violence’ (3 March 2021) <[www.amnesty.org/en/latest/press-release/2021/03/mexico-autoridades-usaron-violencia-sexual-para-silenciar-mujeres/](http://www.amnesty.org/en/latest/press-release/2021/03/mexico-autoridades-usaron-violencia-sexual-para-silenciar-mujeres/)>.
- <sup>23</sup> See, generally, Kimberlé Crenshaw, ‘Mapping the Margins: Intersectionality, Identity Politics, and Violence Against Women of Color’ (1991) 43 *Stan L Rev* 1241. While Crenshaw coined the term itself, the notion of intersectionality has been considered by women across the world for centuries.
- <sup>24</sup> Storey (n 21).
- <sup>25</sup> Fabiola Sanchez and Fernanda Pesce, ‘Femicides in Mexico: Little progress on longstanding issue’ (AP News 27 December 2022) <<https://apnews.com/article/mexico-caribbean-gender-6594c9b2c9ea39a52dc3204e16be704c>>.
- <sup>26</sup> UN Women, ‘Five essential facts to know about femicide’ (25 November 2022) <[www.unwomen.org/en/news-stories/feature-story/2022/11/five-essential-facts-to-know-about-femicide](http://www.unwomen.org/en/news-stories/feature-story/2022/11/five-essential-facts-to-know-about-femicide)>.
- <sup>27</sup> See: [https://infosen.senado.gob.mx/sgsp/gaceta/63/3/2018-03-20-1/assets/documentos/PA\\_PRI\\_Feminicidio\\_Codigo\\_Penal.pdf](https://infosen.senado.gob.mx/sgsp/gaceta/63/3/2018-03-20-1/assets/documentos/PA_PRI_Feminicidio_Codigo_Penal.pdf).
- <sup>28</sup> Grace Flatow, ‘Evaluating Mexico’s General Law for Women’s Access to a Life Free of Violence’ (St Andrew’s Law Review 1 December 2022).
- <sup>29</sup> *ibid*.
- <sup>30</sup> UNHRC, ‘Report of the Working Group on the Universal Periodic Review – Mexico (27 December 2018) UN Doc A/HRC/40/8 para 59.
- <sup>31</sup> Sasha Ramirez, ‘Integrated Domestic Violence Courts: One Solution to Mexico’s Femicide Epidemic’ *California Western International Law Journal* (2021) 506, citing Código Penal Estatal de Veracruz, art. 367, *Diario Oficial de la Federación [DOF]*, 2-04-2010 (Mex.).
- <sup>32</sup> Ley General de Acceso de las Mujeres a una Vida Libre de Violencia Articles 35 and 36.
- <sup>33</sup> Ministry of Foreign Affairs, ‘Gender Alert Declared for the State of Mexico’ (3 August 2015) <<https://embamex.sre.gob.mx/reinounido/images/stories/reinounido/DerechosHumanos/2015/ENG/boletin9.pdf>>.
- <sup>34</sup> *ibid*.
- <sup>35</sup> Alan Jair Garcia-Flores, ‘The gender violence alert mechanism in Mexico: reminiscent of a guaranteed regulatory design?’ (Nova Scientia 2020) vol.12, n.25, 00016.
- <sup>36</sup> Sarah Morland and Caroline Pulice, ‘Failures by Mexican law enforcement aggravate rise in killings of women’ (Reuters 30 November 2022) <[www.reuters.com/world/americas/failures-by-mexican-law-enforcement-aggravate-rise-killings-women-2022-11-29/](http://www.reuters.com/world/americas/failures-by-mexican-law-enforcement-aggravate-rise-killings-women-2022-11-29/)>.
- <sup>37</sup> UNGA, ‘Report of the Special Rapporteur on Violence Against Women, its Causes and Consequences’ (24 July 2020) A/75/144, para 8.
- <sup>38</sup> Natalie Kitroeff, ‘Mexican president says most domestic violence calls are ‘fake’ despite lockdown rise in femicide’ (The Independent 31 May 2020) <[www.independent.co.uk/news/world/americas/mexico-domestic-violence-president-obrador-femicide-lockdown-a9541051.html](http://www.independent.co.uk/news/world/americas/mexico-domestic-violence-president-obrador-femicide-lockdown-a9541051.html)>.
- <sup>39</sup> *ibid*.
- <sup>40</sup> WHO, ‘COVID-19 and Violence Against Women’ (7 April 2020) <<https://apps.who.int/iris/bitstream/handle/10665/331699/WHO-SRH-20.04-eng.pdf>>.
- <sup>41</sup> *ibid*. Emphasis added.
- <sup>42</sup> United Nations, ‘UN Chief calls for Domestic Violence ‘Ceasefire’ amid ‘‘Horrific Global Surge’’’ *UN News* (6 April 2020).
- <sup>43</sup> Grace Flatow (n 21).
- <sup>44</sup> David Agren, ‘Mexico slashes funding for women’s shelters’ (The Guardian 5 March 2019) <[www.theguardian.com/world/2019/mar/05/mexico-funding-cuts-womens-shelters-domestic-violence](http://www.theguardian.com/world/2019/mar/05/mexico-funding-cuts-womens-shelters-domestic-violence)>; David Agren, ‘Femicides rise in Mexico as president cuts budgets of women’s shelters’ (The Guardian 22 July 2020) <[www.theguardian.com/global-development/2020/jul/22/mexico-femicides-president-amlo-women-shelters](http://www.theguardian.com/global-development/2020/jul/22/mexico-femicides-president-amlo-women-shelters)>.