

**Group of Experts on Action against Violence
against Women and Domestic Violence
(GREVIO)**

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

**Comments submitted by Spain
on GREVIO's first thematic evaluation:**

**Building trust by delivering support, protection and
justice**

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COMMENTS FROM THE GOVERNMENT OF SPAIN ON THE FIRST THEMATIC EVALUATION REPORT OF GREVIO FOCUSED ON BUILDING TRUST THROUGH SUPPORT, PROTECTION, AND JUSTICE

1. INTRODUCTION

In 2014, Spain ratified the "Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence," which constitutes the first binding instrument on the matter in the European context and the most comprehensive treaty to address this serious violation of human rights.

Since 2014, the Government of Spain has shown its firm commitment to the full implementation of the Istanbul Convention, as demonstrated by the regulations, public policies, and specific measures carried out in recent years by the Spanish State, the Autonomous Communities, and Local Entities, aimed at combating violence against women in all its forms.

Furthermore, the Government of Spain appreciates the precise and detailed work carried out by the members of GREVIO in the evaluation conducted on the Spanish State. This report has been prepared within the framework of GREVIO's first round of thematic evaluation, initiated in 2023 and developed throughout 2024, focused on building trust through the provision of support, protection, and justice. In this regard, the Government takes note of the recommendations made in the GREVIO Report, fully aware of the work that still needs to be done in the fight against violence against women.

Below are the comments and observations of the Government of Spain on the draft GREVIO Report, for its assessment and consideration.

2. EMERGING TRENDS IN THE AREAS OF VIOLENCE AGAINST WOMEN AND DOMESTIC VIOLENCE

Challenges related to the increasing number of arrivals of asylum seekers to Spain

Paragraph 13

Deficiencies in accommodation facilities and the need for gender-sensitive identification procedures are mentioned. The Ministry of Inclusion, Social Affairs and Migrations responds that specialized places and protocols have been created to improve prevention and response to gender-based violence.



Furthermore, the **Humanitarian Assistance Program** addresses the basic needs of vulnerable immigrants and includes socio-health care services, accommodation, economic aid, and transfers. It includes specialized places for gender-based violence and human trafficking.

The **SEMilla Project**, In collaboration with UNHCR has opened new lines of action to improve the implementation of protocols for addressing violence against women.

Moreover, in 2023, there were 215 specialized places for trafficking and 1,417 places for gender-based violence in the Humanitarian Assistance Program. In the International Protection Reception System, there were 95 places for trafficking and 131 for gender-based violence

3. CHANGES IN DEFINITIONS, COMPREHENSIVE AND CO-ORDINATED POLICIES, FUNDING AND DATA COLLECTION IN THE AREAS OF VIOLENCE AGAINST WOMEN AND DOMESTIC VIOLENCE

B. Comprehensive and co-ordinated policies (article 7)

Paragraph 24

This point states verbatim: GREVIO especially welcomes the substantial measures taken to widen the scope of policies and services to other forms of violence against women than intimate-partner violence, in particular concerning the fact that the previous state strategy mostly dealt with intimate-partner violence, the new State Strategy to Combat Male Violence for 2022-2025 explicitly deals with all forms of gender-based violence covered by the Istanbul Convention. Moreover, a Strategic Plan for the Prevention of Sexual Violence for 2023-2027, prepared by the Ministry of the Interior and covering all levels of administration, was adopted following the entry into force of Organic Law 10/2022 on Sexual Freedom. In June 2024, the National Office against Sexual Violence (ONVIOS) was set up to implement, coordinate and monitor the implementation of the measures contained in the Strategic Plan for the Prevention of Sexual Violence.

Paragraph 26

In order to mitigate the intersectional discrimination affecting women victims of gender-based violence in rural areas, the Guardia Civil, as the state security force with competence in these territories, is promoting collaboration with rural civil society associations with the greatest presence in these areas. Therefore, it is considered appropriate to add a paragraph related to this aspect:

- The Guardia Civil, as the state security force with competence in rural areas, has signed collaboration protocols with rural women's associations that have the greatest presence in these territories, such as AFAMMER and FADEMUR. This allows for better care for victims, facilitating access to assistance and police resources in the most depopulated areas. Training and awareness-raising activities are also organized, offering these women the opportunity to become aware of possible situations of violence and to come into contact with the Guardia Civil.

Paragraph 30



It is commented that the National Office against Sexual Violence (ONVIOS), as an agency of the Ministry of the Interior responsible for the implementation, coordination, and monitoring of all the measures included in the I Strategic Plan for the Prevention of Sexual Violence, has promoted the creation of a working group with associations and other civil society entities that are leaders in the field of sexual violence.

D. Data collection (Article 11)

Paragraph 41

In paragraph 41, GREVIO notes that data on female genital mutilation and forced marriage are still completely lacking.

In this regard, it is indicated that the Ministry of the Presidency, Justice and Relations with the Courts does compile this information, because it is recorded in the system of administrative records to support the administration of justice (SIRAJ), from the imposition of a precautionary measure and/or requisition to the finality of the sentence.

However, this information is not published in a specific and disaggregated manner. In the annual statistics of convicted persons, prepared and published by the National Institute of Statistics (INE) based on information from the Central Register of Convicted Persons integrated into SIRAJ, which collects convictions by type of crime, the crime of female genital mutilation is included in the category of crimes of "injuries", and that of forced marriage is included in the category of crimes of "coercion".

1. Law-enforcement agencies and the justice sector

Paragraph 44

Despite the difficulty in fully tracking cases, the future Onvios system aims to improve the quality of statistics related to sexual violence.

In paragraph 44 of the draft report, it is stated that: *"GREVIO regrets that information on sexual violence is still limited to the number of cases registered by the police. There is no information available on the number of reported cases that lead to sentences or on the outcome of judicial proceedings in this regard."*

In this regard, it is indicated that the Ministry of the Presidency, Justice and Relations with the Courts does compile this information, because it is recorded in the system of administrative records to support the administration of justice (SIRAJ), from the imposition of a precautionary measure and/or requisition to the finality of the sentence. The penalties and security measures imposed on those convicted in a final judgment for any crime against sexual freedom or for trafficking in human beings are included in the Central Register of Sex Offenders and Trafficking in Human Beings, which contains data relating to the identity of the convicted persons, both adults and minors. Recently, the regulation of this register has been improved through Royal Decree 407/2024, of 23 April, amending Royal Decree 1110/2015, of 11 December, which regulates the Central Register of Sex Offenders.

The Ministry of the Presidency, Justice and Relations with the Courts disseminates this information through the INE, which prepares and publishes the annual statistics of convicted



persons.¹ These statistics contain information on persons convicted of sexual offences (disaggregated by sex, age, nationality, number of offences, among other categories); on sexual offences committed (disaggregated by sex, age, nationality); and penalties imposed for these offences.

The Ministry of the Presidency, Justice and Relations with the Courts also publishes in <https://datos.justicia.es/agresiones-sexuales-y-sumision-quimica>, the data that refer to the toxicological studies carried out by the Chemistry and Drugs Services of the National Institute of Toxicology and Forensic Sciences (INTCF) of cases of crimes of a sexual nature judicially investigated referred from the Institutes of Legal Medicine and Forensic Sciences (IMLCF). The study allows us to relate the toxicological findings (alcohol, cocaine, cannabis, amphetamine derivatives, opiates and psychotropic drugs) with various variables, such as sex, age, place of the events, type of day, autonomous community and province.

3. Social services

Paragraph 48

In paragraph 48(a), GREVIO strongly encourages the Spanish authorities to continue their efforts to ensure that data collected by law enforcement, judicial authorities and health services are disaggregated according to the sex and age of the victim and perpetrator, the type of violence, the relationship of the perpetrator to the victim and geographical location.

With regard to this recommendation, it is reported that the system of administrative records in support of the administration of justice (SIRAJ), according to its object and purpose, has data disaggregated by sex and age of both the aggressor and the victim, as well as the relationship of the aggressor with the victim, and geographical location, in crimes of gender-based violence and domestic violence. In the case of sexual crimes, it has data disaggregated by sex and age of the aggressor, as well as geographical location.

In paragraph 48(b), GREVIO encourages harmonisation of data collection between law enforcement and the judiciary, to allow the monitoring of a case through the different stages of the criminal justice system and thus allow the assessment of, inter alia, conviction rates, wear and tear and recidivism.

Regarding this recommendation, it is reported that, at the time a case of violence is prosecuted and whenever a precautionary measure is imposed or a final judgment is issued, that case, that is, the crime committed and the measures and penalties imposed begin to be recorded in SIRAJ, which allows its evolution to be monitored.

¹ <https://www.ine.es/dynt3/inebase/index.htm?padre=4016&capsel=4726>



4. ANALYSIS OF THE IMPLEMENTATION OF SELECTED PROVISIONS IN PRIORITY AREAS IN THE FIELDS OF PREVENTION, PROTECTION AND PROSECUTION

A. Prevention

1. General obligations (article 12)

Paragraph 52

The Ministry of the Interior, through the Secretariat of State for Security (SES), has several research projects underway on the hidden number of complaints in gender violence, as well as the phenomenon of cyberviolence and its impact on cases of gender violence, especially the most serious ones. Furthermore, the I Strategic Plan for the Prevention of Sexual Violence includes as one of its measures the need to strengthen the content on this topic taught in schools among young people, through the Director Plan for Security in Schools, to increase awareness and knowledge of these realities.

2. Education (article 14)

Paragraphs 57 to 59

Although it is true that the distribution of educational competencies in Spain can make it difficult to assess the specific situation of schools, it is important to emphasize that the Organic Law 3/2020, amending Organic Law 2/2006, on Education (together with its corresponding curriculum developments) is a framework that must be complied with throughout the country. Therefore, affective-sexual education, adapted to the developmental level of the students, is one of the aspects included in the organic law. As a result, the fulfilment of this objective is mandatory across the entire territory, although this may result in various types of interventions. The same can be said about teacher training on education equality, which must be guaranteed across the entire territory as it is a provision included in an organic law. Similarly, the regulatory proposals regarding the development of educational materials have already become a reality: for example, regardless of what is done in the various Autonomous Communities, the Ministry of Education and Vocational Training (MEFPD) provides materials related to these topics, organized by courses and levels, which are freely available for teachers to use. (<https://intef.es/recursos-educativos/situaciones-aprendizaje/>).

Paragraph 58

In this section, it is mentioned that "the substantial part of the teaching on issues covered by Article 14 of the Convention seems to be provided by NGOs." Given the important work carried out in this area, it is considered of interest to include a paragraph indicating the training activities carried out by the State Security Forces:

- Within the framework of the Director Plan for coexistence and improvement of security in educational centers and their surroundings, the Security Forces carry out activities on violence against women, digital gender-based violence, gender-based



cyberviolence, human trafficking and exploitation, and the prevention of sexual crimes in which children and adolescents may be involved.

Furthermore, it should be noted that, since these aspects are already included in the formal curricula in a transversal manner, the participation of NGOs in the classrooms may not be considered necessary. However, this does not necessarily imply a lack of interest in these issues.

3. Training of professionals (article 15)

Paragraph 64

Paragraph 64 mentions the Centre for Legal Studies and indicates that it is under the authority of the "Ministry of Justice". At present, the Centre for Legal Studies depends on the Ministry of the residency, Justice and Relations with the Courts.

Paragraph 65

Paragraph 65 describes the training received by members of the judiciary and states that *"The Centre for Legal Studies has the responsibility to train all other legal professionals"*. In this regard, it is considered necessary to clarify that the Centre for Legal Studies (CEJ) trains members of the Public Prosecutor's Career, the Corps of Lawyers of the Administration of Justice and other professionals at the service of the Administration of Justice (such as forensic medicine professionals).

Paragraph 65 states that *"GREVIO states that specific training on intimate partner violence and sexual violence will only be included in the training of all forensic doctors from 2026 onwards."* Regarding this statement, it is recalled the written information that has already been provided to GREVIO on the continuous training of the CEJ for forensic medicine professionals, one of the axes of which is training in gender-based violence and sexual violence.

In 2023, four activities have been taught in this axis, three of them face-to-face and one online, with 40 teaching hours and 167 participants. These activities are:

- Updating of the care and expert assessment of victims of sexual violence. Guidelines and protocols for action: Face-to-face.
- Forms of gender-based violence: online.
- Medico-legal assessment of psychological damage (Its content includes the analysis of the evaluation of the psychological sequelae in the different forms of violence against women): face-to-face.
- New challenges in the expert response in cases of violence against women, children and adolescents. Towards an expert environment based on efficiency, innovation and non-victimisation: face-to-face.

Their training is complemented by the activities of the 2023 Transversal Training Plan: The different Bodies that carry out their training activities at the CEJ participate in this Training. One of the axes around which this training is organized is equality, inclusion and the fight against gender-based violence, an axis in which forensic medicine professionals also participate.



Three activities based on this training axis have been taught, all of them online, with 535 teaching hours and 510 participants, which are called:

- Training itinerary in attention to citizens.
- Awareness and prevention of violence against women.
- University expert course in gender perspective and the fight against gender violence.

In the 2024 Continuing Education, axis 1 of the training is: Violence against women and sexual violence. The following activities are carried out:

- Update on forensic medical care for victims of sexual violence
- Medico-legal assessment of psychological damage.

Their training is complemented by the activities of the 2024 Transversal Training Plan. The three activities that were carried out in 2023 will be held and an online activity will also be taught, with 15 teaching hours and 240 places, which is called: coordination criteria in the field of criminal and civil proceedings in matters of violence against women.

Paragraph 69

Regarding this point on the training of police officers, which again addresses intersectional discrimination, the following contribution is made:

- Guardia Civil is very aware of the intersectional discrimination approach in the field of violence against women to prevent and combat it. Thus, in the curricular design of the various training actions, the possible risks to which women who suffer some type of discrimination are exposed, as well as the combination of two or more of them, are made visible in order to address them appropriately. To this end, the Guardia Civil has collaboration protocols with the following NGOs, associations, and federations that focus on different types of vulnerabilities:
 - In the field of rural women: FADEMUR (Federation of Rural Women's Associations) in 2021. AFAMMER (Association of Families and Women of the Rural World) in 2022.
 - In the field of trafficking, for women and minors victims of trafficking for sexual exploitation and coercive prostitution: APRAMP (Association for the Prevention, Reintegration, and Care of Prostituted Women) in 2022 and DIACONIA in 2023.
 - In the field of Roma women: FAKALI (Federation of Roma Women) in 2024.
 - For people with dyslexia: FEDIS (Spanish Federation of Dyslexia) and DISFAM (Dyslexia and Family) in 2023.

In general terms, these protocols promote, streamline, and strengthen collaboration in support, advice, and care for victims, training and awareness-raising, and strategic information (current situation, trends, etc.), each in its area. All the protocols indicated are specific to violence against women except for FEDIS and DISFAM.

Furthermore, the Ministry of the Interior, through the Secretariat of State for Security, is promoting a study on gender violence in rural areas, aiming to deepen the understanding of the reality of these victims. Specialized training has also been promoted, at all levels and



from a multidisciplinary perspective, on gender violence in vulnerable victims, where the victim is placed at the center of police actions. This aims to improve the training and awareness of agents, as well as to foster the exchange of knowledge, experiences, and best practices among the various professionals involved in the fight against gender violence with these especially vulnerable groups.

F. Protection and support

2. General support services (article 20)

a. Social Services

Paragraph 95

Indeed, as indicated by the provisional GREVIO report, in cases of gender-based violence, legal aid is increased by 25%, whether it benefits the direct victim (when they suffer injuries or health damage) or the minor or incapacitated children as indirect victims (when the result is the death of the woman victim of violence). It is noted that this reform has been in effect since 2018.

- Regarding the mention of Organic Law 10/2022, on the comprehensive guarantee of sexual freedom, two aspects should be noted:
 - On the one hand, aid for therapeutic treatment expenses in crimes against sexual freedom has been regulated since the entry into force of Law 35/1995.
 - On the other hand, and this is the real novelty introduced by the aforementioned Organic Law, it not only offers protection regarding therapeutic treatment expenses in crimes against sexual freedom but also, by providing a new wording to article 6.4 of Law 35/1995, introduces a new type of aid, with a much broader scope, which is dispensable in cases of "sexual violence and gender-based violence that cause mental health damage to the victim," so that the amount of the aid will cover the economic compensation for the damages suffered. That is, not only the therapeutic treatment expenses, which become one of the various compensable concepts, but the totality of the damages caused.

As the report points out, this aid requires regulatory development, which is currently pending.

b. Healthcare services

Paragraph 103

Paragraph 103 refers to the protocols applicable in the forensic field. In addition to these, the [protocol for the forensic medical examination of the detained person \(2023\)](#), the [guide to good practices for its application \(2023\)](#) and the [guide to recommendations for action to respond to article 48.2 of the LOGILS \(2024\)](#) are also considered noteworthy.

[Royal Decree 144/2023, of 28 February, approving the Regulations of the Institutes of Legal Medicine and Forensic Sciences](#), regulates the Comprehensive Forensic Assessment Units, created by Additional Provision 2 of Organic Law 1/2004, of 28 December, on Comprehensive Protection Measures against Gender-Based Violence, which will provide specialised technical assistance in the field of gender-based violence and sexual violence.

Regarding the training of forensic medicine professionals, it is reported that the training of specialists in Legal and Forensic Medicine, a specialty that in the future will be a requirement



for access to the Corps of Forensic Doctors, includes the acquisition of skills related to gender, sexual and child violence, girls and adolescents ([Order PCM/997/2022, of 18 October, approving and publishing the training programme for the speciality of Legal and Forensic Medicine, the evaluation criteria for training specialists and the accreditation requirements for teaching units](#)).

Paragraph 103 states that *"It appears that the form used by the courts to request the collection of forensic evidence, which victims have to sign, still mentions the obligation to file a complaint."* As reported in writing to GREVIO, in 2021 the ministry approved the "[Protocol for medical-forensic action against sexual violence in the Institutes of Legal Medicine and Forensic Sciences](#)", which says that, in order to ensure evidence and the verification of possible injuries, the forensic doctor will intervene together with the specialist of the health system, duly informing the victim of the suitability of the medical-legal examination and the collection of samples for biological and/or chemical-toxicological study, obtaining their consent to do so. This intervention will be carried out without delay and will not be conditional on the existence of a prior complaint since this may be filed later.

The victim must consent, by signing the document, to the medical-legal examination and samples to be collected, but **these actions are not conditional on filing a complaint.**

In this regard, for sexual violence, the Models and Information Clauses available on the following websites:

<https://www.mjusticia.gob.es/es/EIMinisterio/OrganismosMinisterio/Documents/Hoja%20informativa%20consentimiento%20exploraci%C3%B3n%20violencia%20sexual.pdf>

[https://www.mjusticia.gob.es/es/EIMinisterio/OrganismosMinisterio/Documents/Modelo%20consentimiento%20exploraci%C3%B3n%20violencia%20sexual%20\(2\).pdf](https://www.mjusticia.gob.es/es/EIMinisterio/OrganismosMinisterio/Documents/Modelo%20consentimiento%20exploraci%C3%B3n%20violencia%20sexual%20(2).pdf)

These documents do not mention the obligation to file a complaint. Although the court and the proceedings are recorded. This is because forensic doctors must communicate their actions to the judicial body, but that does not mean that the victim must file a complaint.

In addition, the Protocol for Medical-Forensic Action in the Face of Sexual Violence in the Institutes of Legal Medicine and Forensic Sciences (2021) expressly states: *"It is recommended that this intervention be as early as possible and independent of the victim's complaint."*; and *"It is recommended that the judicial authorities and the Public Prosecutor's Office establish guidelines or circulars on the suitability of initiating these procedures independently of the victim's complaint, in order to achieve greater legal certainty both in the medical-forensic intervention and in the collection and processing of samples."*

Also

in

<https://www.mjusticia.gob.es/es/EIMinisterio/OrganismosMinisterio/Documents/Guia%20de%20buenas%20practicas%20muestras%20violencia%20sexual.pdf>

In this regard, coordinated healthcare protocols have been developed where a complaint is not a prerequisite for the collection of forensic samples, in case the victim later decides to file a complaint. The SES (Ministry of the Interior) is collaborating in the articulation of action protocols that determine the procedures to ensure a comprehensive and integrated response from the various administrations and services involved, and that guarantee the probative activity in the resulting processes.



3. Specialist support services (Article 22)

Paragraph 110

It is indicated that asylum-seeking and refugee women are rarely referred to specialized services. The Ministry of Inclusion, Migrations and Social Affairs refutes this, highlighting the increase in specialized places and the implementation of specific protocols.

Furthermore, since 2021, there has been a protocol to improve prevention and response to gender-based violence in the International Protection Reception System.

4. Support for victims of sexual violence (article 25)

Paragraph 116

Currently, the Spanish Security Forces and Corps (that is National Police Forces and Guardia Civil) have signed various collaboration protocols in place with associations, entities, and/or organizations specialized in victims belonging to especially vulnerable groups, so that police forces can refer these victims who require personalized attention and have resources adapted to their specific needs.

G. Substantive law

1. Custody, visitation rights and safety (article 31)

Paragraph 123

Paragraph 123 of the draft report states that *"family judges often appear to be unaware of parallel proceedings, such as criminal proceedings or proceedings before specialized courts on gender-based violence, which limits their ability to take full account of violence against women in their decisions regarding custody and visitation rights."*; and a circular is mentioned, published by the Ministry of Justice to recommend especially in family courts that SIRAJ be used to know any measure related to incidents of gender-based violence. The draft report concludes that: *"However, it is unclear whether this recommendation is systematically applied by all courts and whether the current system allows for automatic detection of decisions related to incidents of domestic violence."*

In this regard, it is reported that, currently, **the consultation of SIRAJ in family proceedings is not a mere recommendation, but an obligation imposed by law.**

Royal Decree-Law 6/2023, of 19 December, approving urgent measures for the implementation of the Recovery, Transformation and Resilience Plan in the field of public service justice, public service, local government and patronage, has amended art. 753 of the Civil Procedure Law to establish the mandatory consultation of SIRAJ and procedural management systems in family proceedings, at different procedural moments, as well as the requirement to the parties on the existence of causes of violence against women.

Article 753. Processing, establishes that:

"1. Unless otherwise expressly provided, the proceedings referred to in this title shall be conducted through the oral proceedings. The lawyer for the Administration of Justice shall



forward the application to the Public Prosecutor's Office, where appropriate, and to the other persons who, in accordance with the law, must be a party to the proceedings, whether or not they have been defendants, summoning them to respond to it within twenty days, in accordance with the provisions of Article 405.

When an application relating to the proceedings referred to in this title is brought before a civil court, for which a court dealing with violence against women may have jurisdiction by reason of the subject matter in accordance with the provisions of Organic Law 6/1985 of 1 July 1985 on the Judiciary, the appropriate consultation shall be requested of the system of administrative registers in support of the Administration of Justice. as well as to the corresponding procedural management system in order to verify jurisdiction in accordance with Article 49 bis of this Law.

The consultation of the system of administrative registers in support of the Administration of Justice and the corresponding procedural management system will be repeated before the hearing or appearance of the contentious or non-contentious jurisdiction procedure or the act of ratification of the procedures by mutual agreement.

Similarly, in the decree of admission, the parties will be required to communicate, within five days, whether there are or have been proceedings for violence against women between spouses or parents, their current procedural status, and whether civil or criminal measures have been taken. Both parties shall also be warned of the obligation to immediately report any proceedings they initiate before a court of violence against women during the course of the civil proceedings, as well as any incident of violence against women that occurs."

Furthermore, in paragraph 123, the Centre for Legal Studies of the Ministry of Justice is also mentioned. Currently, the Centre for Legal Studies depends on the Ministry of the Presidency, Justice and Relations with the Courts.

H. Investigation, prosecution, procedural law and protective measures

1. General obligations (article 49) and Immediate response, prevention and protection (article 50)

Paragraph 138

It should be noted that the State Pact against Gender Violence and Organic Law 1/2004, on Comprehensive Protection Measures against Gender Violence in Spain, establishes a legal framework and a set of measures that reinforce the priority and commitment of the State in the fight against gender violence, reinforcing the need for a rapid, effective, and coordinated response by law enforcement officers and the judiciary.

a. Reporting to, immediate response and investigations by law-enforcement agencies

Paragraph 140

The SES has long been promoting training actions at different levels, both online and offline for both first responders and specialized agents, with the aim that all have sufficient



capabilities to effectively respond to all aspects of sexual violence, from their area of action, both in the first line of intervention and in subsequent moments.

Paragraph 141

The investigation of sexual crimes is indeed particularly complex. In this regard, the SES is working on the development of a unified police action protocol to improve the capabilities of police forces in preventing, attending to, and protecting victims.

Paragraph 142

In paragraph 142, the report refers to the newly created specialized units of the Guardia Civil and the Catalan regional police, but it does not mention that these units already exist in the National Police. Conversely, when the same paragraph states that "to encourage reporting by immigrant women, information has been disseminated to foreign consulates," it does not mention that this initiative was informed and carried out by the National Police.

Paragraph 143

In paragraph 143, it is stated that, according to information obtained during the evaluation visit, "officers are unable to communicate inclusively or do not know how to respond to complaints where the perpetrator is the caregiver." The FCSE and the Ministry itself are working with third-sector organizations to develop a new police care guide for disability that improves police treatment, including resources such as easy reading, the figure of the facilitator, pictograms, etc. It is considered that the statement quoted above is too categorical and absolute and should be qualified. In the case of the National Police, a detailed account was given to GREVIO (in the additional information sent in March, after the face-to-face meetings) of its actions in the field of disability and the resources it has, including all the dissemination material listed in an annex that was also sent to GREVIO.

Furthermore, a new Personalized Security Plan has been developed specifically for especially vulnerable victims such as minors, people with disabilities, the elderly, etc. In parallel with this action, the training of police officers will be kept up to date to enhance their capacity to address the diverse realities of these victims.

b. Effective investigation and prosecution

Paragraph 147

In paragraph 147, regarding the Zero Protocol, it is stated that lawyers working with women victims of gender-based violence claim that the protocol is still not systematically applied by all police officers. The National Police and certainly the Guardia Civil apply it systematically. In this regard, perhaps the VioGén Area could make some observation that could well be accompanied by data on the number of Zero Protocols opened.

c. Conviction rates

2. Risk assessment and risk management (article 51)



Paragraph 161

Paragraph 161, regarding individual security plans, mentions that GREVIO has been informed that, in some areas, they are only systematically applied to women whose risk has been assessed as very high. Regarding this paragraph, the National Police wishes to state that the Security Plans are applied in their entirety regardless of the level of risk.

Furthermore, improving the quality and reliability of risk assessments is a permanent objective of the VioGen System, and a new Protocol for the assessment and police management of risk is currently being developed, which will also include the updating and calibration of the existing risk forms in VioGen.

4. Restraining or protection orders (article 53)

Paragraph 175

Paragraph 175, on monitoring the execution of protection orders, mentions that, according to information obtained during the evaluation visit, law enforcement agencies seem to lack resources to ensure systematic control of the execution of these orders. In this regard, and without prejudice to what the VioGén Area may contribute, the National Police (and also the Guardia Civil) monitor compliance with Protection Orders through the VioGén tool, which, depending on the risk, establishes periodic and systematic controls.

ADDITIONAL COMMENTS

The **Ministry of Social Rights, Consumption and Agenda 2030** comments that:

“We would simply like to share, from the families perspective, that we emphasize throughout the text the importance of intervention in cases of greater vulnerability, as well as the value of Education and training as preventive elements in this matter; and this is successively reflected throughout the text (e.g., pages 23 and 54), where the actions and performance competencies are implicitly described from the perspective of 'Positive Parenting.'”

On the other hand, we agree with the wording and motivation given regarding the voluntary mediation process, in this case adding the concern pointed out about the observation, accompaniment, and review at family meeting points (page 40). All of this is in line with what is stated in the Istanbul Convention; as well as in the thorough assessment of decisions to be made regarding custody and visitation arrangements, always respecting the best interests of minors.”