

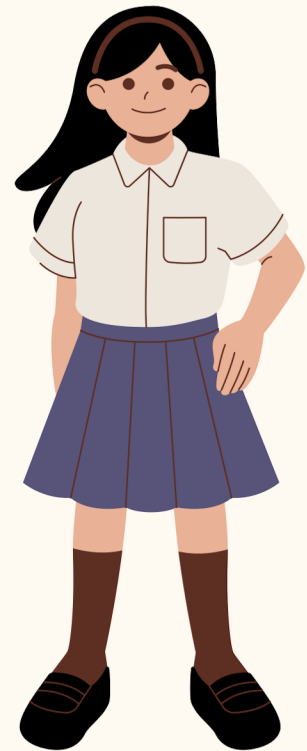
# SALIGAN Batas

## Mothers as Violators of the Anti-Violence Against Women and Their Children Act

*[Content Warning: Violence and suicide.]*

Earlier this year, the Supreme Court came out with a decision that radically changed the law on intimate partner violence. In *Knutson v. Sarmiento-Flores*,<sup>1</sup> the Court, speaking through Justice Mario V. Lopez, ruled that mothers may be considered offenders under the Anti-Violence Against Women and Their Children Act (R.A. No. 9262) for acts of violence against their own children. The ruling negated previously held assumptions about the law among practitioners and implementers.

*Knutson* stemmed from a petition for protection order filed by a father on behalf of his minor child against his wife, the child's mother. The spouses became estranged after the father discovered the mother's extramarital affairs. While the father supported the mother and their child, the mother incurred debts from gambling in casinos. She sold the properties provided by the father and moved to an apartment. She also started a relationship with another man. Later, the father discovered that the mother maltreated her own mother in the child's presence. She also hurt the child "by pulling her hair, slapping her face and knocking her head." At one point, she pointed a knife at the child and threatened to kill her. She also sent a text message to the father about her plan to kill herself and her child. The father reported the matter to the police, but they explained that they could not assist him in domestic issues. Meanwhile, the apartment lessor terminated the mother's lease after marijuana plants were confiscated from the apartment.



In filing the petition before the trial court, the father alleged that the mother placed their child "in a harmful environment deleterious to her physical, emotional, moral, and psychological development." The trial court dismissed the petition. It reasoned that protection orders under R.A. No. 9262 may not be issued in favor of fathers who were not women-victims of violence or against mothers who allegedly abused their own children.

### WHAT'S INSIDE?



The father brought the case directly to the Supreme Court. The Court set aside the trial court's dismissal of the case and ordered the issuance of a permanent protection order. It ruled on two substantive questions: 1) May a father apply for a protection order under R.A. No. 9262 on behalf of his minor child? 2) May a mother be considered an offender under R.A. No. 9262 for acts of violence against her own child? The Court answered both in the affirmative.

On the first question, the Court cited Section 9 (b) of R.A. No. 9262 which explicitly allowed the "parents or guardians of the offended party," without distinction, to file a petition for protection order. Even *Ocampo v. Arcaya-Chua*,<sup>2</sup> the case cited by the trial court, did not rule against the right of a father to apply for a protection order for and on behalf of his child. According to the Court, *Ocampo* only ruled against the issuance of a protection order "in favor of the husband against the wife." In *Knutson*, the father was not asking for a protection order in his favor but in favor of his child. Therefore, the trial court should not have dismissed the petition on this point.

On the second question, the Court cited Section 3 (a) of R.A. No. 9262 which defined violence against women and their children (VAWC) in this manner:

SECTION 3. Definition of Terms. — As used in this Act, (a) "Violence against women and their children" refers to any act or a series of acts committed by any person against a woman who is his wife, former wife, or against a woman with whom the person has or had a sexual or dating relationship, or with whom he has a common child, or against her child whether legitimate or illegitimate, within or without the family abode, which result in or is likely to result in physical, sexual, psychological harm or suffering, or economic abuse including threats of such acts, battery, assault, coercion, harassment or arbitrary deprivation of liberty. [Emphases supplied.]

Citing *Garcia v. Drilon*,<sup>3</sup> the Court emphasized that the law used the gender-neutral word "person" and, therefore, did not limit the offenders to only husbands or fathers. It then cited several examples of social legislation<sup>4</sup> that, despite affording special protection to a particular sector, did not exclude members of the same sector

as possible offenders. The Court also cited the State's duty to protect children under the Constitution, the Universal Declaration of Human Rights (UDHR), and the United Nations Convention on the Rights of the Child (UNCRC). Thus, liberally construing R.A. No. 9262 to "promote the protection and safety of victims of violence against women and their children," the Court ruled that the trial court should not have dismissed the petition for being filed against the mother. It concluded by saying that "the innovative remedies of protection and custody orders" could not be invoked in other laws except R.A. No. 9262.

The implications of the Supreme Court's decision in *Knutson* are far-reaching. For one, the Court justified the inclusion of mothers as possible offenders on the basis of the use of the word "person" in the definition of VAWC. Prior to *Knutson*, the word had been commonly understood in relation to the succeeding words "against a woman [...] or against her child." The "person" who was the offender under R.A. No. 9262 must have had a relationship with the woman-victim or the mother of the child-victim (i.e. her

1 G.R. No. 239215, February 1, 2023. [from front page]

2 A.M. OCA IPI Nos. 07-2630-RTJ, RTJ-07-2049, RTJ-08-2141 & RTJ-07-2093, April 23, 2010, 633 PHIL 79-147.

3 G.R. No. 179267, June 25, 2013, 712 PHIL 44-176.

4 Special Protection of Children Against Abuse, Exploitation and Discrimination Act (R.A. No. 7610), Magna Carta for Persons with Disability (R.A. No. 7277 as amended by R.A. No. 9442), Migrant Workers and Overseas Filipinos Act of 1995 (R.A. No. 8042 as amended by R.A. No. 10022), Magna Carta for Public School Teachers (R.A. No. 4670), Magna Carta for Public Social Workers (R.A. No. 9433), and Magna Carta of Public Health Workers (R.A. No. 7305).

spouse, her sexual or dating partner, or the other parent of her child). Thus, one of the elements of the crime of VAWC was the offender's relationship with the woman-victim or the child-victim's mother.

Knutson has effectively removed the element of a relationship from the crime. A mother cannot have a relationship with herself, yet she can now be considered an offender under R.A. No. 9262. Drawn to its logical conclusion, this interpretation invites the prosecution of VAWC cases against virtually anyone, even persons without any relation at all to a child-victim or their mother, whether as co-conspirators or otherwise.

Perhaps, in reading the provision, the Court focused on acts of violence committed by "any person [...] against her child." This might qualify the expansion of the definition to include only mothers. Understood this way, the element of relationship would have been modified as the offender's relationship with the woman-victim, on one hand, or the child-victim themselves, on the other. Yet, there was no clarificatory statement to this effect in *Knutson*. Instead, the Court provided a list of other

pieces of social legislation that did not exclude members of the protected sectors from possible offenders. The Court did this to buttress its conclusion that even mothers could be offenders under R.A. No. 9262.

Yet, none of the laws cited by the Court had relational definitions of the crimes therein similar to that of VAWC. To be an offender under the Special Protection of Children Against Abuse, Exploitation and Discrimination Act, one did not have to have a relationship with the victim of child abuse. To be an offender under the Magna Carta for Persons with Disability, one did not have to have a relationship with the person with disability. The same is true for the Migrant Workers and Overseas Filipinos Act of 1995, the Magna Carta for Public School Teachers, the Magna Carta for Public Social Workers, and the Magna Carta of Public Health Workers.

In contrast, the definition of VAWC is clearly relational. Unless they are a co-conspirator, an offender under R.A. No. 9262 must be related to the offended party, whether by filiation or by marriage or sexual or

dating relationship with her or the offended party's mother. Certainly, mothers and children can be offenders under R.A. No. 9262. This was clear even prior to *Knutson*. But they must have had a relationship with the offended party. For example, a mother might commit acts of violence against her wife<sup>5</sup> or girlfriend; she would be considered an offender under R.A. No. 9262. A 17-year-old girl might commit acts of violence against her girlfriend's child; she would also be considered an offender under the law. But a mother committing acts of violence against her own child has no legally defined relationship<sup>6</sup> with the child's mother, viz. herself. She might be considered an offender under the Special Protection of Children Against Abuse, Exploitation and Discrimination Act (R.A. No. 7610) or even the Revised Penal Code, but not under R.A. No. 9262.

This brings us to *Knutson's* impact on the intersection between R.A. No. 9262 and R.A. No. 7610. *Knutson* further blurred the lines between the two. If anyone can now be offenders under R.A. No. 9262, what would be its difference from R.A. No. 7610? Of course, jurisprudence has previously clarified that not every form of

5 In some jurisdictions, marriages between two women are allowed.

6 One's relationship with one's self, albeit real and important, is not within the scope of R.A. No. 9262.

violence against children would be covered by R.A. No. 7610. For example, for physical abuse to fall under Section 10 (a) of R.A. No. 7610, there must be a specific intent on the part of the perpetrator to debase, degrade, or demean the intrinsic worth and dignity of the child as a human being.<sup>7</sup> With the *Knutson* ruling, should all cases of child abuse not otherwise covered by R.A. No. 7610 now be considered VAWC cases?

Such an expansive interpretation will likely overwhelm implementers on the ground. Barangay<sub>2</sub>VAW Desks would probably have to entertain all kinds of child abuse. That is, unless the intent is to leave them with the discretion to determine whether certain requisites of R.A. No. 7610 are present in a case, such as the specific intent to debase, degrade, or demean the intrinsic worth and dignity of the child as a human being. If so, are Barangay VAW Desks equipped for this new function?

These implications, among a myriad of others, must be addressed. Mechanisms among the primary duty-bearers in government can be explored to prevent confusion among implementers, enforcers,

and the public. This is especially important for Barangay VAW Desks which, significantly, are still learning to adapt to their additional functions as Anti-Sexual Harassment (ASH) Desks under the Safe Spaces Act. Social workers, prosecutors, public defenders, judges, local authorities, and the police must also be considered.

Ultimately, it is worth considering amending R.A. No. 9262 and other relevant laws for a more streamlined regime on gender-based violence. In his dissent, Justice Alfredo Benjamin S. Caguioa narrated the deliberations among the legislators who enacted R.A. No. 9262. They clarified that the law was not intended to “cover all children victimized by violence or abuse.” Instead, “[t]he child which the consolidated bill intends to protect is the child affected by the abusive relationship the woman-victim is/was into.” In her own dissent, Justice Maria Filomena D. Singh noted that “[t]he law recognizes that violence against a woman's offspring is the most insidious form of violence against the woman herself.”

Perhaps, it must be admitted that the wording

of the law could have reflected the legislators’ intent more clearly. Restructuring the definition of VAWC might be proper to cure any ambiguities, along with amending R.A. No. 7610 and the Revised Penal Code.



<sup>7</sup> *Bongalon v. People*, G.R. No. 169533, March 20, 2013, 707 PHIL 11-23.

## *Institutionalization of the Anti-GBV Referral System of Mobo: Maximizing Community Engagement to End GBV*

**T**he Philippines is one of the nations that consistently performs well in international gender indices, like the World Economic Forum's Global Gender Gap Index, where in its 2022 report, the Philippines ranked 19th out of 146 countries and is the second most gender-equal country in the regional rankings for East Asia and the Pacific.<sup>1</sup> This means that there aren't many distinctions between men and women's status in the nation in terms of economic and labor force involvement, political participation, income, health, education, and literacy. This data may be accurate, but this does not reflect the experiences of all Filipino women and girls, including LGBTQIA+ persons, who are left behind by this development outcomes because of the prevalence of gender-based violence (GBV) in the community.

GBV is still one of the most pervasive human rights violations in the country and worldwide. It is deeply rooted in socio-cultural institutions and is supported by the community's norms and values. According to the most recent National Demographic and Health Survey<sup>2</sup> by the Philippine Statistics Authority, 1 in 4 Filipino women between the ages of 15 and 49 have been subjected to physical, psychological, or sexual abuse by their husbands or partners, and 1 in 20 women and girls in the same age group have experienced sexual assault at some point in their lives. LGBTQIA+ children and adult, alike, are often targets of bullying, abuse and violence that even lead to death. And, yet there is still no national legislation that would protect them from discrimination, abuse and violence. Added to this is the non-reporting of victim survivors due to a culture of silence where many feel ashamed to report or they still think that their experiences are normal part of their relationships and the consequences of the violence are not serious enough to warrant reporting. This makes it an even bigger problem for the authorities because there is no hard data that can be used to determine the scope of GBV in the nation, thus leaving a big gap in implementing Anti-GBV programs in the community.

In Mobo Masbate, some realities that contribute to the vulnerability of women, girls, and LGBTQIA+ persons are the low awareness among local communities and other stakeholders of what constitutes women's and children's rights. Even among those who are generally informed enough to know their rights, some are not empowered to claim them because of the existing culture



*The CBAMG was on a back-to-back activity in Naga City for a benchmarking on the latter's best practices on GAD-related programs and services, followed by a workshop-packed policy writeshop to enhance the referral system of Mobo, as shown in the photo.*

1 <https://investinginwomen.asia/knowledge/global-gender-gap-report-2022/>

2 [https://psa.gov.ph/sites/default/files/PHILIPPINE%20NATIONAL%20DEMOGRAPHIC%20AND%20HEALTH%20SURVEY%202017\\_new.pdf](https://psa.gov.ph/sites/default/files/PHILIPPINE%20NATIONAL%20DEMOGRAPHIC%20AND%20HEALTH%20SURVEY%202017_new.pdf)

and tradition in their community, which discriminates against women and LGBTQIA+ persons who strongly talk about and claim these rights. Another is the uncoordinated efforts among service providers from local offices and government agencies. Separately, these offices are strictly implementing their respective mandates to address gender-based violence. However, oftentimes, for those who actually report their cases, they feel the inadequacy of the services provided because only those urgent concerns are addressed while the others are often left unresolved or least prioritized, and when they go back to their home and community, they face the same problem over and over again. This lack of a systematic approach to handling GBV cases has weakened the community's response to GBV and the thrust of stakeholders to engage in activities that will eliminate GBV in their community.

The Inter-Agency Council on Violence Against Women and Their Children's (IACVAWC) has identified several ways to end violence against women, one of which is the creation of an integrated referral system at all levels of government. Further, DILG MC NO. 2021-093, requires local government units (LGUs) to map-out VAW services, programs, and facilities in their respective jurisdictions in order to address the problem of VAW victim-survivors not being aware of the services and protective mechanisms available to them in the community. Thus, the following salient features of the Guidelines in the Establishment and Management of a Referral System on VAW became material for the LGU of Mobo in enhancing their One Stop Shop Referral System to the, now, Anti-GBV Referral System of Mobo.

### What is a referral system?

A Referral System<sup>3</sup> is a co-operative framework through which government agencies carry-out their obligations to ensure that the human rights of victim-survivors of violence are respected, protected and fulfilled. It, also, function to coordinate their efforts in a strategic partnership with non-government organizations and civil society as a whole in addressing the various needs of the victim-survivors.

### What are the essential elements of a referral system?

In order for a referral system to operate effectively and to ensure that its program and services are effective, gender-responsive and sustainable, the following elements must be present:



*The different stakeholders in Mobo, Masbate, were gathered together for a community consultation and validation session on the revised Anti-GBV Referral System in Mobo. During the session, the CBAMG took on the main task of facilitating the workshop-consultation among the different barangay officials, government agencies identified as among the service providers in the referral system, civil society organizations and victim-survivors.*

<sup>3</sup> [https://www.dilg.gov.ph/PDF\\_File/reports\\_resources/DILG-Resources-201238-0d19ae2c04.pdf](https://www.dilg.gov.ph/PDF_File/reports_resources/DILG-Resources-201238-0d19ae2c04.pdf)

1. A group of agencies/organizations that, in the aggregate, will provide comprehensive services-medical/health, psychological, social, economic, legal and spiritual, to meet the needs of the victims-survivors of violence and their families;
2. An agency/organization that coordinates and oversees the referral network;
3. A designated focal person at each agency/organization responsible for the processing of referrals efficiently and in gender-responsive manner;
4. A directory of services and agencies/organizations present in the locality;
5. Standardized referral forms to be used by the members of the network to acquire essential information and to avoid the need to re-tell the story of abuse by the victim-survivor;
6. A feedback loop to track referrals and facilitate the coordination and monitoring of cases referred; and,
7. Documentation of the respective roles of the agencies/service providers in the referral process and outcome.

### What are the steps in establishing a referral system?

Creating a referral system involves various steps that must be undertaken to ensure that there is transparency and accountability among stakeholders and that services and programs are responsive to the needs of the victim-survivors and their family.

1. Convene an initial stakeholders' meeting/workshop.
2. Conduct a participatory mapping exercise.
3. Establish a referral network.
4. Put systems in place to develop and support the referral network.
5. Mobilize the community to use and support the referral network.
6. Monitoring and Evaluation of Referral System.

The Community-Based Advocacy and Monitoring Group (CBAMG) of Mobo was established as part of the SALIGAN-implemented project "Strengthening Community Response Against Gender-based Violence through Legal Empowerment and Creation of Referral System" of Oxfam Pilipinas. The CBAMG was established to play a leading role in advancing the rights of women, girls, and LGBTQIA+ people in Mobo. It is made up of key representatives from the Rural Health Unit, Municipal Planning and Development Office, and the Provincial and Municipal Social Welfare and Development Office, as well as focal points from the Department of Interior and Local Government and Mobo Police. The civil society organizations were represented by MIDAS, Inc., Mobo Women Federation, and MYHEA.



*Aside from the input-discussions, the CBAMG eagerly participated in various structured learning exercises and workshops conducted along with the discussion. Here, the different groups described their understanding and vision of what a gender-fair society is through artistic means, like drawing and writing poems.*

Before embarking into the formulation of the referral system, the CBAMG participated and co-facilitated in a series of consultation and validation sessions with community leaders, VAW victim-survivors, government service providers and civil society organizations working for the interests of VAW victim-survivors to identify gender-related issues that are actually faced in the community, analyze the reason or root cause of these issues and to identify the existing gender responsive services, mechanisms and structures that are already present in their community.

Then, the CBAMG underwent a series of learning sessions on gender orientation, rights and entitlements of women and LGBTQIA+ persons, legal framework for protection against GBV, gender-sensitive handling of GBV cases and establishment of referral system, and policy advocacy and lobbying. This was complemented by a learning visit to Naga City, a PCW-accredited learning hub, show casing their gender innovative programs. The knowledge and skillset gained in this series of learning and consultation sessions helped the CBAMG to have a full understanding of the extent of the gender issues ought to be addressed by their referral system. As a result, the following are the strengthened aspect of the Anti-GBV Referral System of the Municipality of Mobo:

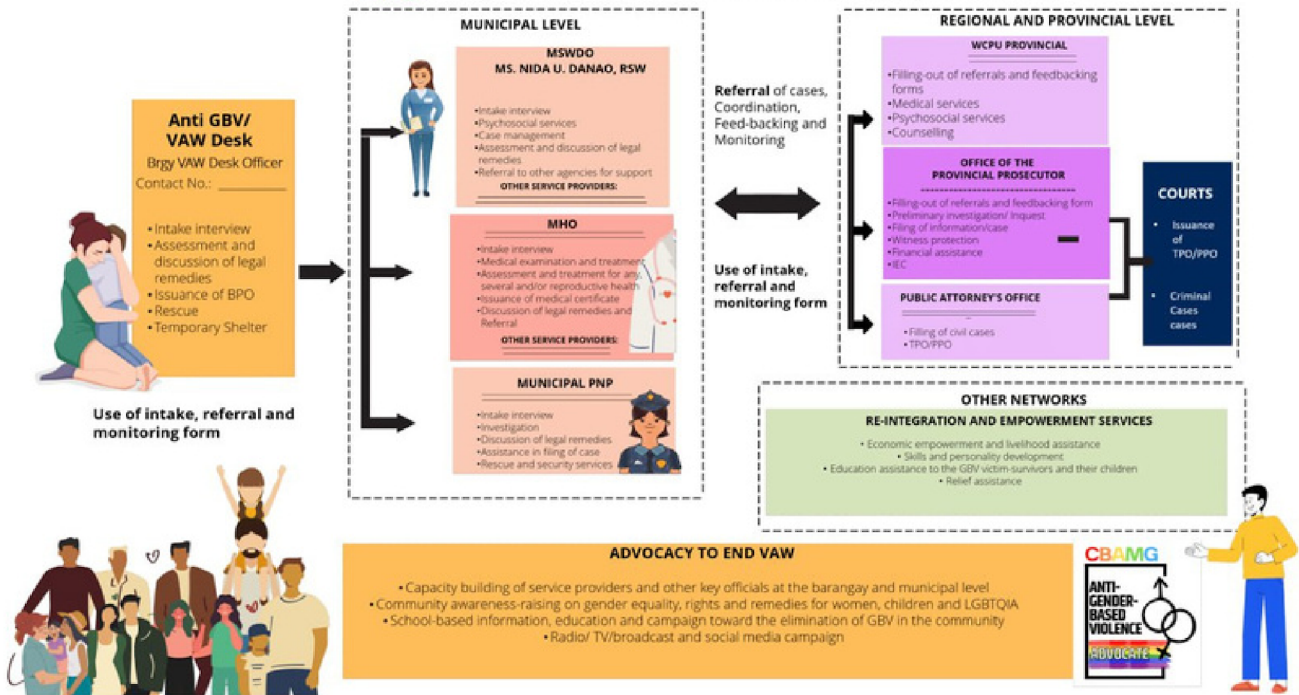
- a.** Programs and services are consciously made accessible to girls and LGBTQIA+ persons, thus service providers are mandated to further develop their programs and services to be sensitive to the peculiar needs of said sectors;
- b.** Expanded list of service providers to include not just LCU offices but also local offices of government agencies and civil society organizations operating in Mobo, Masbate;
- c.** Program and services under the referral system now includes preventive, reintegration and empowerment services aimed at increasing the capacity of the victim-survivor to protect one's right against discrimination, abuse or violence.
- d.** Increased participation of the barangay, through its VAW Desk, in providing direct services, strengthening its referral system and advocacy work toward the elimination of GBV in their community.
- e.** Improved coordination and monitoring system through regular feed-backing among service providers and use of intake, referral and monitoring forms.

To institutionalize the referral system and the roles and responsibilities of the service providers, the CBAMG formulated and filed before its local sanggunian a policy entitled, AN ORDINANCE INSTITUTIONALIZING THE ANTI GENDER-BASED VIOLENCE REFERRAL SYSTEM, CREATING MECHANISMS FOR IMPLEMENTATION AND PLANTILLA POSITION OF SOCIAL WELFARE OFFICER II, APPROPRIATING FUNDS THEREFOR AND PROVIDING PENALTIES FOR VIOLATION THEREOF, which is currently referred to the committee level for deliberation and hearing. Simultaneously, the CBAMG members have taken steps in their respective offices and organization to implement their learnings, such as re-echoing of the learning sessions, segregation of data among women, men and LGBTQIA+ persons.





## Anti-Gender Based Violence Referral System of the Municipality of Mobo



The Anti-Gender Based Violence Referral System Flowchart of the Municipality of Mobo

## *Domestic adoption proceedings are now administrative: Petitions pending in judicial courts may be withdrawn*

On January 28, 2022, Republic Act (R.A.) No. 11642 or the “Domestic Administrative Adoption and Alternative Child Care Act” took effect. The law transferred all government functions relating to alternative child care and adoption to the National Authority for Child Care (NACC), a one-stop quasi-judicial agency attached to the Department of Social Welfare and Development (DSWD). The law vested original and exclusive jurisdiction over “all matters pertaining to alternative child care” to the NACC, including declaring a child legally available for adoption and domestic administrative adoption.

Considering that adoption is now a purely administrative proceeding, the law provides that all judicial petitions for domestic adoption pending in courts may be immediately withdrawn so that the parties to the same may avail of the benefits of the new process under R.A. No. 11642. Thus, on April 19, 2022, the Supreme Court issued A.M No. 02-6-02-SC outlining the following guidelines on the implications of R.A. No. 11642 on the Rule on Adoption:

- Courts may no longer accept petitions for domestic adoption starting January 28, 2022, the date of effectivity of R.A. 11642, since jurisdiction over the same is already lodged with the NACC. Adoption proceedings are now administrative.
- Judicial petitions for domestic adoption already pending in court may be withdrawn at the option of the petitioner, regardless of the stage of the proceedings. Otherwise, the courts shall continue to hear and decide such petitions.
- The courts shall give petitioners time to manifest their intent to withdraw. Failure to notify the court within the set period is considered a waiver of the option to withdraw their petitions.
- The court shall sanction petitioners, and their respective counsels, who avail of the benefits of R.A. 11642 without first withdrawing their pending petitions before the courts.
- Domestic adoption provisions in the Rule on Adoption are now rendered ineffective, except insofar as petitions for adoption not withdrawn are concerned.
- Rescission of judicial adoptions shall now likewise be under the jurisdiction of the NACC.

Prior to R.A. 11642, the domestic adoption procedure was divided into two phases: the administrative phase and the judicial phase. The administrative phase involved adoption forums, counseling by a licensed social worker, submission of formal requirements to the DSWD or to an accredited child placing agency, a home study conducted before matching or family selection, and the pre-adoption placement in which the prospective parent or parents are given physical custody of the child for a trial period of six (6) months. Meanwhile, the judicial process includes the undertaking of case study, supervised trial custody, court hearings, and publication of and opposition to the adoption decree. However, such process entails the participation of the social worker and the same requirements as in the administrative process.

It is expected therefore that the new law and guidelines will streamline the domestic adoption process, lessen its cost, and shorten the period to complete the adoption, all while protecting the best interests of the child.

## ***Paralegal Feature: Elisa Maceda***

**E**lisa Maceda is a graduate of SALIGAN's Stop Violence Against Women Paralegal Formation Program in 2018. Prior to joining the program, Ate Elsie, as she is fondly called, volunteered for the Montalban Action Group in Montalban, Rizal. She also trained as a community organizer with the Community Organizers Multiversity (COM). She looked into the issues confronting the members of their community, monitored the livelihood assistance given to recipients in their locality and became the team leader in the Bottom-Up Budgeting Approach of their local government unit.

Her participation in the paralegal formation program equipped her with the legal knowledge and paralegal skills in handling cases of violence against women (VAW) in their locality. It also boosted her confidence in sharing her knowledge on laws that protect and uphold women and children's rights. She assisted their barangay in the handling of VAW and child abuse cases and counselled women and children suffering from domestic violence. She also provided assistance to the victims by accompanying them in reporting

the cases in the barangay or police station and referral to local physicians for medical examination and the lawyers for legal advice. At some point, she would provide temporary shelter to VAW victims especially when the latter don't feel safe under the same roof with their partners. She, together with her fellow paralegal graduates, also conducted several learning sessions in Taytay, Rizal and Calamba, Laguna to discuss the Anti-Violence Against Women and their Children (Anti-VAWC) Act and the Anti-Child Abuse Law.




*Ms. Elisa Maceda, paralegal*


When the pandemic hit the country, Elsie continued to serve her community by providing frontline services through the Malabon Action Group. She signed up for the program on Strengthening Community Response against Human Rights Violations during the Pandemic and provided guidance to their community in ensuring that no abuses will be committed in implementing the rules and policies at the height of the health crisis. And when a strong typhoon hit their village in 2020, she was in the frontline providing immediate assistance such as coordinating for the provision of food, clothing and temporary shelter to the affected families.


Currently, she is part of the Women Advocacy Team of SALIGAN where, together with her fellow paralegal graduates, they are pushing for the amendment of the Anti-VAWC Act that will answer the gaps in the implementation of the law. She is also the Secretary of the Montalban Action Group and the local community organizer of the eight phases of the relocation site in Kasiglahan village where she continues to assist her community in finding opportunities for livelihood programs and in the handling and referral of VAW and child abuse cases. When there are opportunities, she participates in discussions on women, children and housing rights. It may be a thankless job without remuneration but knowing that she has the capacity to uplift the situation of her community in her own little ways is what pushes her to carry on.



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