

**International Protection
and
Gender-Related Persecution**

Presentation
by
Judith Ramirez
Chairperson, Toronto Working Group on Women Refugee Claimants
Immigration and Refugee Board

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In Memory of Lisa Gilad

Introduction

I am very pleased to take part in this session on "Gender Issues in Refugee Affairs". For the past eight years I have been a Member of the Immigration and Refugee Board of Canada (IRB) which is mandated by Parliament to determine Convention refugee status for those arriving at Canada's borders. For those of you who may not be familiar with the IRB, let me say that it is the largest administrative tribunal in Canada and its Convention Refugee Determination Division (CRDD) has approximately 170 decision-makers, or Members, throughout the country. The majority of hearings are non-adversarial and take place before two Members. It is only necessary for one Member of the panel to decide in the claimant's favor in order for the claim to succeed. On average, we receive approximately 25,000 refugee claims a year and our rate of acceptance hovers around 71%. The number of women refugee claimants has consistently averaged roughly one third of the total and the acceptance rate has not varied significantly from the overall average.

In operation since 1989, the IRB applies the definition of who is a Convention refugee found in the 1951 United Nations Convention Relating to the Status of Refugees and now incorporated into Canadian law. This definition states that any person who has a well-founded fear of persecution for reasons of race, religion, nationality, political opinion, or membership in a particular social group, who is outside her country of nationality and is unable or unwilling because of that fear to avail herself of the protection of that country is a Convention refugee.

Since 1990, when the first Working Group on Women Refugee Claimants was established in Toronto, the IRB has consistently explored issues surrounding gender-related persecution. We were well aware that the vast majority of refugee claimants who reach the shores of industrialized countries are men, even though 80% of refugees worldwide are women. In our view, this fact alone argues for ensuring that Canada's determination system should be equipped to recognize forms of persecution suffered primarily if not exclusively by women. Otherwise, we risked perpetuating a system which doubly disadvantages women refugees. They have less mobility and fewer resources to reach countries like Canada and once they arrive, in disproportionately low numbers, their experiences or persecution and lack of state protection are often not recognized.

The history of the IRB's early efforts to grapple with the procedural, substantive and training implications of gender-related persecution has been dealt with extensively by Flora Liebich, past chairperson of our Working Group, and myself in "Gender Issues and Refugee Determination".¹ Suffice it to say here that the IRB took up the challenge of moving towards gender-inclusiveness in a climate of growing recognition that women often fear persecution for different reasons than men do, and that even when their fear is for the same reasons (race, religion, nationality, etc.), women often experience persecution differently.

¹ published as "A History of Institutional Change: The Immigration and Refugee Board (Toronto) Working Group on Women Refugee Claimants" in Refugee Women: Defining Identity and Place, Fernwood Press, 1996

In the last decade the international community has begun to re-interpret the meaning of persecution which developed historically in response to the experience of male refugees.² In 1985 the Executive Committee of the United Nations High Commissioner for Refugee (UNHCR) recognized that women who face harsh or inhumane treatment for transgressing the social mores of their societies may be considered a “particular social group” within the UN definition of a Convention refugee.³ The UNHCR also issued “Guidelines on the Protection of Refugee Women”⁴ and in 1993 the Executive Committee adopted Resolution 73 which encourages states to interpret sexual violence as a form of persecution. As well, the UN Commission on Human Rights adopted a resolution in 1993 expressing its concern and acknowledging that women are susceptible to particular sorts of human rights abuses. And finally, the United Nations Fourth World Conference on Women, held in Beijing, China, last September, agreed that discrimination on the basis of gender can be grounds for granting refugee status.

The Gender Guidelines

In 1993 IRB Chairperson, Nurjehan Mawani, issued Guidelines on Women Refugee Claimants Fearing Gender-Related Persecution.⁵ The purpose of the Guidelines

² No definition of persecution is provided in the 1951 Convention, nor in the Immigration Act. In Canada, the IRB is bound by the relevant jurisprudence of higher courts. It is also guided by the UNHCR Handbook on Procedures and Criteria for Determining Refugee Status and the international human rights instruments.

³ Conclusion No. 39 (XXXVI) Refugee Women and International Protection, Executive Committee 36th Session, 1985

⁴ “Guidelines on the Protection of Refugee Women”, prepared by the Office of the United Nations High Commissioner for Refugees, Geneva, Switzerland, July 1991

⁵ Guidelines Issued by the Chairperson Pursuant to Section 65(3) of the Immigration Act, Women Refugee Claimants Fearing Gender-Related Persecution, Immigration and Refugee Board, Ottawa, Canada, March 9, 1993

is to provide substantive legal and procedural guidance in analyzing gender-related issues in refugee claims made by women. The legislative authority to issue guidelines was given to the IRB Chairperson when changes to the Immigration Act were enacted in February 1993. Canada was the first refugee-receiving country to establish formal guidelines for the adjudication of refugee claims made by women.

Internationally, the Canadian Guidelines have served as a model for other countries, notably the United States which issued its "Asylum Gender-Based Guidelines" in 1995. Immigration and Naturalization Service Commissioner Doris Meissner recognized Canada's leadership role, as well as that of the United Nations, in identifying discrimination suffered by women which is "unique to their gender".⁶ As well, at a UNHCR "Symposium on Gender-Based Persecution" held in Geneva this past February, a number of other countries expressed their intention to issue gender guidelines, including Australia, Denmark and Switzerland.

The Canadian Gender Guidelines outline common forms of persecution directed primarily against women:

- persecution on the basis of kinship, where a political opinion is imputed to them due to the political views or activities of family members;
- severe discrimination based on the fact that they are women;
- persecution for transgressing religious precepts, social mores, and legal or cultural norms; and
- exposure to violence by the authorities or private actors, including domestic violence, from which the state is unable or unwilling to protect them.

⁶ "INS Distributes New Asylum Gender-Based Guidelines", Press Release, U.S. Department of Justice, INS, Washington, D.C., May 26, 1995

The Framework of Analysis that accompanies the Guidelines is an important tool in analyzing the link between gender, the feared persecution, and one or more of the grounds in the definition of a Convention refugee.

To illustrate the effect of the Guidelines on refugee claims in the past three years, let me cite a number of early decisions:

* A Vancouver panel found that two Mayan sisters from Guatemala were refugees. The teen-age girls were threatened with rape by soldiers because their father was involved with the guerrilla movement. As young women, they were particularly vulnerable in their society and they were not protected by the state authorities. (CRDD U92-00883/00884 23/03/93)

* A battered wife from Bulgaria was determined to be a refugee when a Toronto panel concluded that state authorities had failed to protect her because her husband was employed by the security services. She complained to the police on several occasions and was told that no action would be taken against her husband because he had not violated public order. (CRDD T92-09592 14/9/93)

* A panel considered the case of a young Pakistani woman who was active in the student wing of the Pakistan People's Party. She had been physically and sexually assaulted by a man she recognized as belonging to a rival student political group. As a result of the attack, she became pregnant. Fearing that her father might have her killed to protect the family honour, she fled to Canada where she gave birth to her child. The panel decided the claimant to have a well-founded fear of persecution because of her membership in a particular social group of raped, single females with a child born out of wedlock. The panel looked at the evidence showing that the penal laws in Pakistan weigh more heavily on women than on men. For a woman to prove sexual assault, she must obtain the confession of the perpetrator or the testimony of four adult male Muslim witnesses of the act. If a

woman fails to prove the sexual assault, she is then charged with adultery. If a woman does not file charges and becomes pregnant, she is also charged with adultery. The panel found that the claimant would face prejudicial treatment before the law, potential physical harm and possible death if she were returned to Pakistan. (CRDD U93-06372 10/12/93)

The IRB's Gender Guidelines are currently being updated to reflect recent developments in the jurisprudence on gender-related persecution. The decisions of the reviewing courts as well as the CRDD's own case-law are the bases of the revision process. Internal consultation on a Draft Update is currently being co-ordinated by the Working Groups on Women Refugee Claimants in all the regions. The IRB Chairperson expects to issue the Updated Guidelines in the coming months.

The Public/Private Dichotomy

The Gender Guidelines explicitly address the public/private distinction which historically has rendered women's experience invisible and prevented the recognition of women's societal rights as human rights deserving of national and international protection. Canadian refugee jurisprudence has long recognized that violations of fundamental rights by non-state actors can found a refugee claim.⁷ The Guidelines apply this notion to severe discrimination on grounds of gender or acts of violence, "...either by public authorities or at the hands of private citizens from whose actions the state is unwilling or unable to adequately protect the concerned persons."⁸

⁷ Rajudeen v. M.E.I. (1984), 55 N.R. 129 (F.C.A.). This case involved a Tamil whom the Sri Lankan police failed to protect from Sinhalese thugs.

⁸ Guidelines, p.8

Thus, domestic and sexual violence (actual or threatened) by private citizen, i.e., male actors such as husbands or boyfriends not susceptible to state control, can found a refugee claim. The critical issue is the availability of state protection. The Guidelines state:

Decision-makers should consider evidence indicating a failure of state protection in that governing institutions and/or their agents in the claimant's country of origin may have condoned the instances of sexual violence if they had been aware of them or did nothing to prevent them.⁹

Since the advent of the Canadian Charter of Rights and Freedoms,¹⁰ jurisprudence on women's rights has challenged the public/private dichotomy in cases involving domestic and sexual violence by a male partner. In The Queen and Lavalle,¹¹ the Supreme Court of Canada took issue with the prevailing societal pattern of accepting domestic violence. The view that the home is a private sphere within which the husband has unfettered sway over his wife was challenged head-on. Madam Justice Wilson said for the Court: "...no man has a right to abuse any woman under any circumstances." According to leading feminist lawyer Mary Eberts, "This is a real breakthrough, not only putting women at the centre of judicial analysis of cases involving women, but also in expressing severe social opprobrium of what had long been tolerated."¹²

Supreme Court of Canada Decision in Ward

⁹ Ibid., p. 8

¹⁰ Canadian Charter of Rights and Freedoms, Part 1 of the Constitution Act, 1982, being Schedule B of the Canada Act 1982 (UK), 1982, c.11

¹¹ R. v. Lavalle (1990), 1 S.C.R. 852 (Madam Justice Wilson). In this case a battered wife was acquitted of murdering her common-law husband on the grounds that she had a reasonable apprehension of bodily harm and was entitled to defend herself.

¹² "Women's Equality Rights in Canadian Law", unpublished speech, Immigration and Refugee Board International Women's Day Celebration, March 8, 1993, Toronto, Canada, p.8

Since the issuing of our Gender Guidelines, the Supreme Court of Canada has handed down its landmark decision in Ward¹³ which, along with other recent decisions of the Federal Court of Canada, elaborates on the interpretation of “membership in a particular social group”. Ward outlines three categories that would constitute a “particular social group”:

- 1) groups defined by an innate or unchangeable characteristic;
- 2) groups whose members voluntarily associate for reasons so fundamental to their human dignity that they should not be forced to forsake the association; and
- 3) groups associated by a former voluntary status, unalterable due to its historical permanence.

The Court noted that the first category would “embrace individuals fearing persecution on such bases as gender, linguistic background, and sexual orientation.” Parenthetically, the second category would cover human rights activists, among others, and the third category which emphasizes “historical intentions” would include “capitalist class” and “independent businessmen” (Ward, p. 731).

Clearly, the Supreme Court has reinforced the notion put forward in our Guidelines that gender can be the basis of a “particular social group” and thus found a Convention refugee claim. Moreover, Ward also recognizes that “underlying the Convention is the international community’s commitment to the assurance of basic human rights without discrimination.” The Court has reinforced the position taken in the

¹³ Canada (Attorney General) v. Ward, [1993] 2 S.C.R. 689 (C.A.)

Guidelines that the harm feared by women "...ought to be assessed by reference to human rights instruments which provide a framework of international standards for recognizing the protection needs of women."¹⁴

In defining "persecution", the Supreme Court in Ward emphasizes the lack of state protection, not whether the state was "complicit" in the persecution. The Court defines "persecution" as a "sustained or systematic violation of basic human rights demonstrative of a failure of state protection" (Ward, p. 739). This approach is in contrast to that taken by many countries in Europe, including Germany, France, Italy, Norway, Sweden and Switzerland who do not generally accept as refugees people targeted by "non-state agents", that is by "groups or organizations that are not controlled by their country's government."¹⁵

Canadian refugee determination is bound by the interpretation of "persecution" in the Ward decision. A recent CRDD case in which I took part illustrates how this approach can work in practice. The case¹⁶ involved a mother-led family from an African country. The mother feared returning to her homeland and losing custody of her two children, a daughter, age 10, and a son, age 7. The evidence before us established that in her country of origin a divorced women automatically loses custody of her children both by custom and under Sharia law. Reports characterize the society as "overwhelmingly restrictive and patriarchal" and one which harshly subordinates women in matters of

¹⁴ Guidelines, p.8

¹⁵ "Persecution Complex", Refugees (Asylum in Europe Issue), UNHCR, March 1995, p.17

¹⁶ T93-12198, Ramirez, McCaffrey, May 10, 1994

marriage and parenting.¹⁷ Because it is a patrilineal society, "...children belong to the clan of their father and for this reason a divorced woman would not be given the custody of her children, either male or female."¹⁸

The panel found that this approach could lead to serious discrimination against women such as the claimant who automatically lose their custody rights on divorce under Sharia law on account of their gender. At issue are the fundamental human right of equal standing before the law and internationally protected equal rights in marriage.

Article 7 of the Universal Declaration of Human Rights (UDHR) states:

All are equal before the law and are entitled without any discrimination to equal protection of the law.

And Article 16 of the UDHR states:

Men and women of full age, without any limitation due to race, nationality or religion, have the right to found a family. They are entitled to equal rights in marriage, during marriage and at its dissolution (our emphasis).

The mother also feared that she would be powerless to prevent her daughter from being subjected to female genital mutilation (FGM), a practice affecting 98% of women and girls in her homeland. At the refugee hearing, the mother described the terror of her own experience of genital mutilation and her determination to spare her daughter the same fate. My colleague and I concluded that "the psychological trauma which the claimant would suffer upon losing custody and access to her two remaining children would constitute 'serious harm' in the Convention refugee sense".

¹⁷ Country Reports on Human Rights Practices for 1993, United States Department of State, February 1993, p. 263

¹⁸ Response to Information Request, Number: SOM 17433.E, 18 May 1994, The Documentation, Information and Research Branch, Immigration and Refugee Board, Ottawa, Canada

Regarding the young male claimant, the panel, in accordance with the Convention On the Rights of the Child, considered whether his “best interests” would be considered in the matter of custody and concluded that they would not. He was determined to have a well-founded fear of persecution in his homeland.

Female Genital Mutilation as a Form of Gender-Related Persecution

In considering the claim of the ten-year old female child, the panel looked at Article 3 of the UDHR which states that “Everyone has the right to life, liberty and the security of person” and concluded that “the minor claimant’s right to personal security would be grossly infringed if she were forced to undergo female genital mutilation...”

Article 19 of the Convention on the Rights of a Child calls on governments to “protect the child from all forms of physical and mental violence injury or abuse...” Article 24 recognizes the “...right of the child to the enjoyment of the highest attainable standards of health...” and calls on governments to “...take all effective and appropriate measures...to (abolish) traditional practices prejudicial to the health of children.” Finally, Article 37 explicitly protects children from acts of cruelty, torture and any other form of “inhuman or degrading treatment”.

Documentary evidence from the Inter-African Committee on Traditional Practices Affecting the Health of Women and Children (IAC) established that in the claimant’s country of origin FGM was outlawed in 1947 but that the overwhelming majority of women continue to undergo mutilation. Based on the evidence the panel concluded that

“the authorities will not protect the minor female claimant from the physical and emotional ravages of FGM given the evidence of its widespread practice in that country”.

You will be interested to know that, with this decision in 1994, Canada became the first country to recognize female genital mutilation as a form of gender-related persecution. Several years earlier the French Commission for Appeals of Refugees denied the claim of Aminata Diop, a twenty-two year old woman from Mali, for credibility reasons, but recognized that genital mutilation could be a form of persecution under the Geneva Convention. Recently the Federal Court of Canada (Trial Division) recognized FGM as a “cruel and barbaric practice”¹⁹ and held that the claimant had “a valid fear of persecution” in her homeland because the state would fail to protect her from mutilation. And finally, last week the United States Board of Immigration Appeals granted political asylum to nineteen-year old Fauziya Kasinga, who fled Togo several years ago to avoid genital mutilation. This is a landmark ruling from the highest administrative tribunal in the United States immigration system. It sets a binding precedent for immigration judges throughout the country.

Gender-Sensitive Procedures in the Hearing Room

The IRB recognized early on that women claimants may face socio-cultural and other impediments to giving testimony in a quasi-judicial setting. Women from cultures where the preservation of virginity or marital dignity is of paramount importance may be very reluctant to disclose that they have been sexually assaulted. They fear that their disclosure may bring disgrace or dishonor to their family or community.

¹⁹ IMM-215-95, July 25, 1995 (FCTD)

The Gender Guidelines address this issue directly. In cases of sexual assault or domestic violence, it encourages the use of innovative approaches to hearing a woman's evidence. For example, testimony may be given outside the hearing room, by affidavit or videotape. In addition, in order to make it easier for a woman to testify about sexual assault, a female interpreter, female Members and a female Refugee Claim Officer (RCO), whose function it is to assist the panel, are often provided.

One of the key functions of the Working Groups on Women Refugee Claimants is to identify training needs and develop specific training products, often in consultation with the Regional Professional Development Committees. Last year, I co-ordinated a training module on "*Questioning on Sensitive Issues*" which focused on claims involving sexual assault. We began by exposing common myths about sexual assault:

- that rape is motivated by sexual desire
(no, in fact, it is purely an act of aggression)
- that only certain kinds of women get raped
(factual data show exactly the opposite - no woman, whatever her age, appearance or conduct is safe from it)
- that women often make false allegations of rape
(on the contrary, women are extremely reluctant to make such allegations because of the humiliating experience of merely recounting them or, in many countries, because of the ostracism that would ensue)

We then examined the pattern of symptoms know as Rape Trauma Syndrome: persistent fear, loss of self-confidence and self-esteem, self-blame, difficulty in concentration, a pervasive feeling of loss of control, and memory loss or distortion. In a hearing, these symptoms may be evident in the demeanor of the claimant in ways that can

affect her credibility. For example, she may be silent for long periods, block associations, stutter, and show signs of physical distress.

In break-out groups consisting of Members, RCOs and Legal Advisors we discussed case scenarios with questioning techniques designed to put the claimant at ease so that she is able to give all the evidence necessary to make a determination. I will cite two of the case scenarios to illustrate our approach.

CASE 1: You suspect sexual assault but the claimant has only mentioned that she was interrogated and insulted during detention. You could elicit evidence by setting a general context that depersonalizes the issue for the claimant, for example,

“We know that often women in your country have very bad experiences with the authorities while in detention and that those may be very hard to relate without re-living these experiences. Is there anything that happened to you in detention that you would want to tell me about?”

or

You could choose an even more indirect way to elicit the evidence. If you know that the country or the community the claimant is from would reject her if she had been raped you could ask,

“If others in your village (or community, or family, as applicable,) found out what happened to you in detention how would they treat you and your family?”

CASE 2: If the claimant has indicated that she was sexually assaulted but is not providing details, you could ask about the circumstances surrounding the incident. Credibility about these facts will establish credibility about the incident without ever questioning about that specifically. In fact, it is much more useful evidence than the details of the assault which are unnecessary and too painful to relate. The idea is to require the claimant to provide specific information which will be a test of credibility by its consistency and depth but without focusing on the assault itself. For example,

“We need to know a little more about the assault to understand what happened to you. Can you tell us where you were when the incident took place?”

Do you remember what you were doing just before?

Was anyone with you when it happened? If so, did anything happen to that person?

Did you tell anyone about the incident? etc...

If the claimant remains reluctant to testify, it is useful to allow the claimant to regain her composure either by shifting to unthreatening questions, or giving verbal reassurances or granting a recess, or, in extreme cases, adjourning for psychiatric evaluation.

The module on "*Questioning on Sensitive Issues*" was very successful in Toronto and has since been used as a basis for training in other IRB regions, including Vancouver and Montreal. We are currently developing a national training module on domestic violence as it relates to the refugee determination process.

Emerging Human Rights Issues

One of the many ways that emerging human rights issues are identified at the IRB is through the Working Groups on Women Refugee Claimants. Last year, the IRB International Women's Day Celebration in Toronto, organized by our Working Group, focused on the rights of refugee children, with specific attention to the female child refugee claimant. Krista Daley, then a Legal Advisor and member of our Working Group, addressed procedural and evidentiary issues such as selecting a Designated Representative for the hearing; the importance of using the right interpreter; and obtaining sufficient credible evidence to make a proper determination. In connection with the latter, Ms. Daley suggested that every attempt should be made to get the required evidence from adult family members, professionals who have dealt with the child here in Canada and/or documentary evidence. She noted that:

The ability of a child to provide information about their claim will be a function of many factors including the age of the child, the mental development of the child, the condition under which they arrived in Canada, the influence of any adults, and

the experiences of the child before arriving in Canada. A child may have been traumatized by events in her home country or be traumatized by the flight to Canada and the displacement from familiar surroundings. Female refugee children may also have specific problems if the role of girls within her own society is a passive stereotyped role. She may find herself incapable of telling information about her claim and the fact that she is being asked to speak about herself may be an unfamiliar position for her to be in. If sexual assault is involved the concerns with respect to adult women are equally applicable and in particular rape trauma syndrome should be taken into account.²⁰

Ms. Daley also addressed the issue of the grounds of the definition and how they can be applied to children and to the female child. She noted that the ground of political opinion may apply to children even though their activism may take different forms than that of adults. She offered the following analysis:

The child's sphere of experience is a small sphere that revolves around the home and the school. A common form of activism for children is to protest with respect to inequities, perceived or otherwise, within the education system. This has been seen extensively within the apartheid system of South Africa where school children were very active in protesting the segregated education system. These protests resulted in extensive crackdowns by the government and the unlawful detention of 1000's of South African children has been well documented. Female children may take on other forms of activism such as the refusal to conform to the school's discriminatory practices. Recently this was seen in Bangladesh where young women are protesting that they have a curfew and young men do not, refusal to conform to the roles assigned to them and to move into files of education normally

²⁰ "The Female Child Refugee Claimant", unpublished speech, Immigration and Refugee Board International Women's Day Celebration, March 1994, Toronto, Canada, p.7 and 8

reserved for men, refusal to conform to dress restrictions in the schools. These acts may be viewed as political acts.²¹

Prof. Cynthia Price-Cohen, Executive Director of Child Rights International Research Institute, provided a comprehensive overview of the United Nations Convention on the Rights of the Child (UNCRC). Her address also elaborated on the fundamental human rights principle of “the best interest of the child” and its practical application in refugee determination, particularly relating to young female claimants. She offered examples dealing with FGM, child prostitution and arranged marriage.

The issue of minor claimants, especially those who are unaccompanied by adults, has been recognized as an emerging human rights issue at the IRB. Separate Working Groups on Minor Claimants have been established to help focus the Board’s response in this critical area. Later this year the IRB Chairperson plans to release procedural guidelines on unaccompanied minors, possibly followed by guidelines on how to apply the Convention refugee definition to minor claimants.

The Civil War Guidelines

On March 7, 1996, the IRB Chairperson issued Guidelines on Civilian Non-Combatants Fearing Persecution in Civil War Situations.²² In the consultation leading up to the Civil War Guidelines, the Working Groups on Women Refugee Claimants responded to several drafts, commenting specifically on gender-related issues. The

²¹ Ibid.,

²² Guidelines Issued by the Chairperson pursuant to Section 65(3) of the Immigration Act, Civilian Non-Combatants Fearing Persecution in Civil War Situations, Immigration and Refugee Board, Ottawa, Canada, March 7, 1996

approach taken in the Civil War Guidelines recognizes that warring factions often target women of the enemy community and subject them to systematic acts of violence such as mass rape. The Guidelines suggest that this is not just an anonymous consequence of war, as it is often seen, but rather, persecution for a Convention ground. The Guidelines canvass how fear of persecution can arise in the context of a generalized civil war and under “group-based harm that is distinguishable from the general dangers of civil war” it includes women and children who may, because of their social or political role or because of their association with others, be targets of deliberate violence and abuse. Together, the Civil War Guidelines and the Gender Guidelines provide a helpful framework for assessing gender-related persecution which may take place in the context of civil war.

The Canadian delegation to the United Nations Fourth World Conference on Women, held last September, promoted an initiative to make rape during armed conflicts a “war crime” subject to international courts, and to recognize the rape of women of a particular race or culture in war as a form of genocide. Both positions were adopted by the 190 countries attending the conference and included in the final documents reflecting the consensus achieved.

Conclusion

I trust that my account of how the IRB has systematically developed a human rights approach to international protection for gender-related persecution will be a useful starting point for your discussion today. I look forward to your questions and comments.

Thank you.