

Shadow of Justice: Review on women's struggle against gender-based violence in Ghana and South Africa

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Abstract

Ghana and South Africa, though distinct in trajectories, share a common commitment to advancing gender equality and women's empowerment. This review explores women's struggle against gender-based violence, contextualizing them within each country's distinct historical, sociocultural, and legal contexts. A meta-analysis and feminist approach, integrated with historical narratives, legal frameworks, and sociocultural analyses are employed to provide a nuanced understanding of women's struggle in both countries. Struggles by women's rights movements against gender-based violence in Ghana reveal a rich tapestry of activism, marked by the resilience of numerous individuals and groups. From the pre-independence struggles to contemporary advocacy, Ghana's trajectory showcases the transformative power of collective action against gender-based violence. However, challenges rooted in socio-economic and political systems, cultural norms, and institutional barriers persist. In South Africa, the apartheid legacy significantly shaped the nature of women's rights struggles. The intersectionality of race and gender forms a complex backdrop against which activism has flourished. Landmark legal reforms have catalyzed progress, yet gaps persist, particularly in the realm of implementation. Obstacles faced by both nations include gaps in enforcement, the influence of patriarchal norms, and the need for inclusive policy measures. The review underscores the importance of context-specific approaches in addressing the multifaceted challenges faced by women in the pursuit of justice while offering valuable insights and directions for policymakers, activists, and scholars working toward gender equality in both countries.

Keywords: *Shadow of justice: Gender-based violence, Women's rights struggle: Feminism: Ghana: South Africa*

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Introduction

Gender-based violence is a pressing global issue that inflicts profound physical, emotional, and psychological harm upon victims. This pervasive problem is particularly acute in countries like Ghana and South Africa, where historical and societal factors have contributed to its prevalence (Allen 2018; Amoakohene 2004). In both nations, women's rights movements have played a pivotal role in challenging gender inequalities and advocating for reforms to protect women from violence. These movements, rooted in the struggles for independence and civil rights, continue to be instrumental in shaping policies and raising awareness about gender-based violence (Oboro-Offerie and Abrefa Busia 2022; Gouws and Coetzee 2019; Amoah-Boampong 2018). Historically, Ghana and South Africa have witnessed women's rights movements that have catalyzed change in their respective societies. In Ghana, the fight for women's rights gained momentum during the colonial era and was further energized by the struggle for independence (Adelakun 2021). Women played crucial roles in the political, social, and economic development of the nation, demanding equal rights and representation (Antwi 2018). Similarly, South Africa's women's rights movement has a rich history intertwined with the anti-apartheid struggle (Buqa 2022). Women were at the forefront of resistance against racial and gender-based injustices, exemplified by iconic figures like Albertina Sisulu and Winnie Mandela. Statistics on gender-based violence in Ghana and South Africa paint a distressing picture of the extent of the problem. In Ghana, recent reports indicate that nearly one in three women has experienced some form of violence in their lifetime (Ghana Statistical Service 2017). Similarly, South Africa grapples with alarmingly high rates of gender-based violence, with an estimated one in five women experiencing intimate partner violence (Statistics South Africa 2020). These statistics highlight the urgent need for comprehensive strategies to address the physical and psychological well-being of women affected by gender-based violence in both nations. From a feminist perspective, understanding gender-based violence requires an analysis that goes beyond isolated incidents, delving into the underlying power structures and patriarchal norms that perpetuate it. Feminist theories and concepts, such as intersectionality, emphasize how various forms of oppression intersect to exacerbate experiences of violence (Crenshaw 1991). Additionally, feminist perspectives challenge cultural norms and legal frameworks that condone violence against women, advocating for comprehensive approaches that address systemic inequalities (Bunch 1990). This paper explores the multifaceted nature of gender-based violence (GBV) through a feminist lens, ultimately advocating for strategies that not only address immediate manifestations of GBV, but also dismantle the deep-seated inequalities that sustain it in Ghana and South Africa. Though both nations face notable challenges related to violence against women, their cultural, legal, and socio-economic contexts differ considerably. In examining these differences and similarities, the review provides nuanced insights into how various factors influence the prevalence and response to violence against women. This comparative approach highlights effective strategies and policies that one country may adopt from the other, fostering cross-learning and potentially improving the overall effectiveness of interventions aimed at reducing violence and supporting survivors.

Additionally, this review contributes to understanding how international frameworks and local realities intersect in addressing violence against women. Both Ghana and South Africa are signatories to international protocols like the Convention for Elimination of All Forms of Discrimination Against Women (CEDAW), yet their implementation and impact vary. In comparing the two countries, the review assesses the role of advocacy, governance, and community-based initiatives in combating violence. This can inform policymakers, activists, and international bodies about best practices and areas needing improvement, thereby enhancing efforts to combat gender-based violence not only in Ghana and South Africa but also in other countries facing similar challenges.

Legislative and policy landscape

The quest for gender equality has been a dynamic journey shaped by the historical intricacies and societal landscapes of individual nations. In the realm of legal frameworks for women's rights, Ghana and South Africa stand as compelling case studies, each echoing a unique narrative in response to its distinct historical struggles. South Africa, emerging from the shadows of apartheid, embarked on a transformative path with the adoption of a progressive constitution in 1996 (South African Human Rights Commission 2018; The South African Government 2018). Meanwhile, Ghana's legal landscape intertwines with its pursuit of independence where women actively participated in pre-independence activism, laying the groundwork for legal provisions that acknowledged and protected their rights in the post-independence era (Adelakun 2021). In examining the legal framework in both countries, this part of the review explores the similarities, strengths, and weaknesses, offering insight into the complex and changing landscape of women's rights.

According to Safro-Kantankah (2022), gender-based violence is a pivotal issue acknowledged by the international community, particularly the United Nations. In both Ghana and South Africa, existing policies exhibit a shared commitment to upholding and advancing women's rights, albeit with distinct nuances. In South Africa, the three gender-based violence laws signed by President Cyril Ramaphosa underscore a dedicated effort to protect women's rights. These legislative measures, such as the Sexual Offences and Related Matters Amendment Act, Criminal and Related Matters Amendment Act, and Domestic Violence Amendment Act, demonstrate a focused response to safeguarding women from various forms of violence (Republic of South Africa 2007a; Republic of South Africa 1998; Republic of South Africa 2007b). In prioritizing victim-centered approaches, these laws not only seek to prosecute offenders but also emphasize support mechanisms for survivors, thereby reinforcing the principles of gender equality and non-discrimination.

Similarly, Ghana's Domestic Violence Law (Act 732) and the establishment of the Domestic Violence and Victim Support Unit aligns with the broader objective of promoting women's rights (Coleman, 2021). The legal framework provides a foundation for addressing domestic violence, which disproportionately affects women. Additionally, the Domestic Violence and Victim Support Unit's role in prevention, support, and protection further contributes to the advancement of women's rights by creating a responsive system within the Ghana Police Service (Safro-Kantankah 2022; Coalition for Women's Economic Empowerment and Equality 2020). Ultimately, the policies in Ghana and South Africa serve as vital instruments in the pursuit of gender equality and the protection of women's rights. The effectiveness of these measures hinges on continuous efforts to address implementation challenges and foster a comprehensive, inclusive, and sustained approach to advancing women's rights in diverse societal contexts.

While both Ghana and South Africa have demonstrated dedication to addressing gender-based violence, there exist perceptible gaps in their respective approaches. Despite the laudable signing of these impactful laws by the President of South Africa, implementation challenges persist. Supporting the notion of persistent challenges of implementation, the South African Human Rights Commission (2018:13) highlights significant gaps in enforcing these legal measures. These gaps contribute to the concerning lack of accountability for those responsible for gender-based violence emphasizing the need for enhanced mechanisms to ensure thorough and effective execution of the existing legislative and policy frameworks. This implies that the effectiveness of these measures may be compromised without robust enforcement mechanisms and adequate resources for victim support and awareness. Similarly, in Ghana, although strides have been made with the enactment of Act 732, there are notable gaps in the implementation and accessibility of support services. Ballantine, Fenny, Asante and Duvvury (2017) assert that despite the dedicated efforts, the execution of initiatives falls short, leading to a gradual pace of progress on the ground. Their characterization of Ghana as having a “yawning gap” between legislation and practice emphasizes the substantial challenges hindering the effective translation of legal and policy frameworks into tangible outcomes. Therefore, the acknowledged gaps in both South Africa and Ghana underscore a need for comprehensive sustained efforts. The practical realization of these measures faces challenges, leaving a

concerning void between legislation and effective execution. For both countries, this may hinder their ability to comprehensively address the multifaceted aspects of gender-based violence.

Feminist perspective on the limitations and gaps existing in laws

In the context of the feminist critique of legal frameworks addressing gender-based violence in South Africa, it's crucial to note that apartheid laws not only promoted racial segregation but also contributed to gender-based violence against black women, while white women received more legal protection (Armstrong 1994). For instance, black men were killed for raping white women (Feimster 2009). This discriminatory legal structure reinforced power imbalances, leaving black women vulnerable to violence (Davis 1983). White men, benefiting from the unequal legal system, were often shielded from accountability, perpetuating a culture of impunity (McGuire 2010). This historical perspective underscores the need for a feminist critique to address how legal frameworks historically failed to protect women, particularly black women, and contributed to the perpetuation of gender-based violence. Allen (2018) echoes that despite the post-apartheid South African government's implementation of progressive laws and initiatives aimed at safeguarding, empowering, and elevating the status of women vis-à-vis men, there has been a disheartening lack of reduction in the prevalence of various forms of gender-based violence. This persistence is attributed to the entrenched influence of a robust patriarchal culture that remains deeply rooted in South African society. Additionally, there is a prevalent tendency to predominantly attribute gender-based violence to the historical context of apartheid, as observed in the analysis by Allen (2018). Feminist perspectives in Ghana argue that despite the government's legislative efforts to combat gender-based abuses and implement sanctions for offenders, the actual impact has been limited. This viewpoint, articulated by Amoakohene (2004), highlights the enduring influence of male dominance across various spheres of life, perpetuating the vulnerability of women. The essence of this argument lies in the assertion that legal measures, while in place, face challenges in addressing deeply ingrained societal structures contributing to the ongoing mistreatment of women. Amoakohene's analysis prompts a broader consideration of not just legal frameworks but also the intricate cultural and systemic factors that sustain gender-based abuses in Ghana, emphasizing the necessity for a comprehensive approach to effect meaningful change.

Economic and political context

In the journey towards societal progress, the stumbling blocks of economic and political challenges cast a looming shadow, hindering the realization of women's rights and intensifying gender-based violence in both Ghana and South Africa. These challenges are not just abstract complexities, they are tangible barriers that stifle the agency of women, impeding their ability to break free from abusive situations. The intertwining dynamics of economic disparities and political intricacies create a toxic brew that disproportionately affects women, limiting their full participation in the social and political spheres. According to the United Nations (2023), educating women holds the key to empowering entire generations. However, amidst a concerning rise in gender-based violence, there is a noticeable absence of adequate support for victims. Women and girls, disproportionately affected by a confluence of challenges including, socio-economic difficulties (Statistics South Africa 2020; Ghana Statistical Service 2017), and the lingering impacts of the COVID-19 pandemic (Ndlovu et al. 2022), face hindrances in progressing toward the Sustainable Development Goals. It is evident that this is not just about statistics or policies, it is about the passionate call for a world where women can thrive without fear, where their rights are not just acknowledged but fiercely protected. In Ghana and South Africa, the battle against GBV is inseparable from the broader fight for women's rights and addressing economic and political barriers are the rallying cry for a future where every woman can live free from the shackles of violence and discrimination.

In both Ghana and South Africa, though significant strides have been made politically to establish legislation aimed at safeguarding women's rights and combating gender-based violence, the journey towards comprehensive protection remains an ongoing and dynamic process. According to Gordon et al.

(2022), politically driven efforts have led to the enactment of laws that specifically address women's rights, providing a legal framework to prosecute offenders and protect victims. These legislative measures often encompass stringent penalties for perpetrators, mechanisms for restraining orders, and avenues for support and rehabilitation for survivors. However, the effectiveness of legislative strides can be influenced by factors such as ensuring that laws are consistently enforced, that resources are allocated adequately to support victims and implement preventive measures, and that societal attitudes evolve to fully embrace the principles embedded in these legal frameworks (Blofield et al. 2021). The disruption of income sources has imposed significant financial and psychological burdens on primary breadwinners, predominantly men, creating a precarious situation with potential ripple effects. This circumstance, as highlighted by the United Nations Ghana (2020), not only strains financial stability but also introduces an alarming element of psychological stress. It's crucial to contextualize this within Ghana and South Africa, especially considering the impact of the COVID-19 pandemic. In both countries, the pandemic has taken a toll on economies, exacerbating financial hardships and contributing to heightened tensions within households (Papagiannopoulou 2022). Additionally, the economic strain caused by job losses, reduced opportunities, and financial insecurity could act as a catalyst for increased domestic tension, further escalating the risk of gender-based violence.

There is unequivocally no justification for gender-based violence, particularly when it results in fatalities and severe bodily harm. The horrifying reality that women are forced to skip work due to being brutally assaulted not only inflicts immediate harm but also perpetuates a detrimental ripple effect. The Coalition for Women's Economic Empowerment and Equality (2020) emphasizes how gender-based violence acts as a formidable barrier to women's economic opportunity and growth. Beyond being a consequence, gender-based violence can also impede women's empowerment by hindering their participation in the workforce. Acts like domestic or intimate partner violence and sexual assault can restrict women's mobility, preventing them from commuting to and from work or engaging in necessary job functions. The repercussions of gender-based violence extend to psychological and physical impacts, influencing not only the victims but also workplace productivity, potentially leading to unjust dismissals (World Health Organization 2021; Pillinger 2019).

While employment or entrepreneurship can provide avenues for women to achieve financial independence and escape abusive situations, it is crucial to acknowledge that some economic empowerment programs may inadvertently contribute to the increase in gender-based violence. Sabri and Granger (2018) emphasize that women who are victims of gender-based violence often experience a substantial loss of earning capacity, a consequence that echoes far beyond the individual level. When women are incapacitated or, tragically, lose their lives due to such violence, the ramifications extend to those who depend on them, such as their families, and children. The economic toll is undeniable, further underscoring the urgency of eradicating gender-based violence to safeguard not only individual lives but also the economic stability and well-being of society at large. The pervasiveness of gender-based violence, resulting in women skipping work due to severe physical harm or even death, egregiously infringes upon their fundamental rights. Primarily, the right to life and bodily integrity are blatantly violated, as women face the risk of losing their lives or enduring severe injuries. Moreover, the right to work is undermined, as women are compelled to skip work due to the physical and emotional aftermath of violence, disrupting their professional lives and financial independence (Showalter 2016). This dire situation further encroaches upon the right to economic participation, as women suffer a loss of earning capacity and economic productivity. In addition, the ripple effect extends to the right to education and the well-being of their dependents, as children and families are profoundly affected by the consequences of gender-based violence (WHO 2015; UNICEF 2020). By allowing such violence to persist, both Ghana and South Africa compromise the basic human rights of women, perpetuating a cycle of injustice that requires urgent and comprehensive intervention to ensure the protection and empowerment of women in all facets of their lives.

Feminist analysis of economic and political actors perpetuating violence against women

A feminist analysis of the economic and political factors perpetuating violence against women unveils a complex web of structural inequalities that systematically disadvantage women in both countries. Economically, women contend with wage disparities and restricted access to resources, heightening their vulnerability to violence (Musetsho Isaac and Dobrin 2021; ILO 2020). The workplace, characterized by unequal power dynamics, becomes a breeding ground for harassment and exploitation (Arthur-Holmes and Abrefa 2021; Pillinger 2019). Additionally, economic dependence on male partners or family members acts as a barrier, limiting women from seeking help or leaving abusive relationships, underscoring the pivotal role financial autonomy plays in fostering agency (Walby 2011). On the political front, patriarchal power structures contribute to the perpetuation of violence against women (Htun and Weldon 2018). Male-dominated political landscapes often result in inadequate legal frameworks and insufficient enforcement of measures to protect women's rights (Allen 2018). The absence of gender representation in political systems overlooks the unique challenges faced by women, impeding the formulation of comprehensive policies to address and prevent gender-based violence (Adjei et al. 2022 Kanjere 2019). The intersectionality of economic and political factors exacerbates the issue, particularly affecting marginalized women, such as those from minority communities, who experience heightened vulnerabilities due to systemic discrimination and lack of representation (Okrah 2018; Geisler 2000). Moreover, Dery (2020) highlights a feminist analysis revealing that men, fearing the loss of cultural privileges and meanings associated with dominant notions of masculinity, may resist feminist discourses. Economic factors further emerge, as Feminist Africa notes the impact of COVID-19 containment measures on mental health and the prevalence of gender-based violence during emergencies due to inadequate planning around increased unpaid care and domestic overload (Ndlovu et al. 2022). Even before the pandemic, governments in both countries struggled to provide essential services to address gender-based violence effectively. Ouedraogo and Stenzel (2021) shed light on the potential increase in abusive behavior during sharp economic downturns, citing job loss and material hardship as contributing factors. This aligns with Matjasko, Niolon, Valle's (2013) assertion that poverty and a lack of affordable housing options can intensify the difficulty of escaping violent relationships for abused women. In failing to address these economic and political barriers, women are left disenfranchised and subjected to abuse, infringing upon their rights and freedom. This emphasizes the need to dismantle barriers and create an equitable society free from gender-based violence.

Cultural and social context

According to SaferSpaces (2022), the stark reality is that societies, including South Africa and Ghana, are far from being exempt from gender-based violence. This assertion contradicts the ideals of a just and equitable society, revealing the harsh truth that gender-based violence is pervasive even in contexts where one would hope for safety and fairness. According to the United Nations (2020), the patriarchal system deeply embedded in Ghanaian society contributes to this issue, because within this patriarchal framework, beliefs in male superiority manifest in harmful ways, ranging from entitlement to control over women's bodies to strict enforcement of gender roles and hierarchies, where any deviation is met with punishment. This perpetuates a system where women are assigned lower social value and power, and masculinity becomes synonymous with the control of women. This deeply ingrained inequality not only hampers women's ability to safeguard their bodies and meet basic needs but also allows perpetrators to act with impunity. Alangea et al. (2018) state that, there exists a deeply ingrained hierarchical gender structure in both Ghana and South Africa, wherein men hold the highest positions. The authors emphasize that this societal framework demands the wives' adherence to prevent potential violence within households. Disturbing this hierarchy, as suggested by the authors, may lead to repercussions such as spousal abuse. This insight underscores the critical intersection between cultural norms, power dynamics, and the prevalence of gender-based violence. It sheds light on the challenges faced by women who might face violence if they challenge the established gender order within their homes. This cultural dimension emphasizes the urgency of addressing societal norms as part of a comprehensive strategy to curb gender-based violence in these contexts. As elucidated by Alangea et al. (2018), the prevailing community norms

in both Ghana and South Africa perpetuate male dominance and tolerate violence against women, reinforcing cultural ideologies that relegate women to subordinate positions. Sikweyiya et al. (2020) contend that these structures of domination and exploitation, rooted in patriarchy, amplify women's vulnerability to violence. The acceptance of violence within the cultural fabric legitimizes such harmful practices, creating an environment where women are more susceptible to abuse. As asserted by Buqa (2022), the use of male-dominant language within households, coupled with deeply rooted African cultural practices such as paying bride prices in both Ghana and South Africa, subtly perpetuates a troubling cycle of abuse against women. Zinyemba and Hlongwana's (2022) insights reveal that the cultural dynamics surrounding lobola, including the expectation of spousal submission and the perception of conjugal rights, create a climate that silences women. This silence forces them to accept violence within marriages, viewing it as normal and beyond questioning due to the association with lobola payments. Rooted in the patriarchal system, these cultural norms contribute to the diminishing value of respect between men and women, identified as foundational factors fueling Gender-Based Violence.

This intricate problem is influenced by a complex interplay of factors, encompassing individual traits, family dynamics, and socio-economic contexts, all contributing to constructs that systematically devalue women and children. Particularly noteworthy are cultural norms that amplify men as sole economic providers, intensifying gender-based abuse by framing women as dependents of economic benefits even within intimate relationships (Buqa 2022). Clearly, In Ghana and South Africa, cultural practices and how people speak at home sometimes make women seem less important. This happens because traditional beliefs highlight men as the main providers, making women financially dependent on their partners. In both countries, entrenched cultural norms and societal attitudes impact the status and rights of women, manifesting in various facets of life. Traditional gender roles relegating women to domestic spheres and men as primary breadwinners perpetuate unequal power dynamics within households (Antwi 2018).

In addition, customary practices often favor male inheritance, limiting women's access to property and economic resources despite legal provisions (GSS 2017). Culture and traditions, such as bride price customs where the groom's family presents either materials, money, cows or both to the bride's family and polygamy, perpetuate the commodification of women and hinder their agency in marital relationships (Baloyi 2022; Amoakohene 2004). These norms also contribute to disparities in education, with societal preferences sometimes favoring boys' education over girls', impacting literacy rates among women (GSS 2015). Additionally, cultural tolerance and stigma surrounding gender-based violence inhibit reporting and support for victims, posing significant challenges in addressing this issue (GSS 2015; Amoakohene 2004).

This situation infringes on women's rights by limiting their independence and making it harder for them to be treated fairly and equally. These ingrained customs create a multifaceted web of legal, political, and economic constraints, impeding the advancement of women's rights. Traditional attitudes relegating women to subordinate roles or stereotyped positions contribute to widespread practices of violence, vividly evident in instances like domestic abuse and female circumcision, as highlighted by Khutsoane (2019). Adedokun (2002) emphasizes the enduring impact of tradition in conditioning women and children to accept the harsh realities of gender inequality, perpetuating a culture that tacitly endorses violence. Dome and Amoah (2022) assert that men's abusive tendencies, rooted in cultural norms such as the male-centric lifestyle and commodification of women through practices like bride price, perpetuate a view of women as property, justifying actions like non-consensual sex. From a legal standpoint, Adedokun (2002) underscores that constitutional provisions in Ghana explicitly prohibit customary practices that dehumanize or harm individuals, aiming to eradicate practices that compromise the overall quality of life and impede the realization of women's rights. This shows that there is an urgent call to dismantle the roots of gender-based violence deeply embedded in cultural and societal norms, fostering an environment where respect and equality prevail.

Feminist perspective on patriarchal systems

In the ongoing pursuit of gender equality and social justice, the feminist perspective stands as a resolute force challenging deeply ingrained patriarchal systems. Rooted in the recognition that historical and societal norms have perpetuated systemic inequalities, feminists advocate for a transformative shift that dismantles structures reinforcing gender-based oppression. In the profound analysis by du Plessis (2019), feminist scholars assert that entrenched traditions and religious beliefs serve to legitimize men's use of violence against women. This perspective contends that when women are dehumanized in the eyes of men, it often manifests in violent actions toward them, extending even to the troubling empowerment of men to sexually assault their wives. In both countries, rape is a particularly common form of violence, leading to legislative amendments to address its prevalence. This critical stance on the intersection of tradition, religion, and violence is especially relevant when examining the socio-cultural dynamics in both countries. Tenkorang et al. (2013) further elucidate the close link between feminist models and cultural explanations of domestic violence, emphasizing the influence of traditions, customs, and norms within African cultures. This connection is particularly evident in the normalization and legitimization of wife beating and other forms of violence across many African societies, including Ghana. The socio-cultural variables at play, such as the justification of violence by wives and controlling behaviors exhibited by husbands, become influential factors in perpetuating domestic and marital violence. This not only underscores the urgent need for addressing cultural norms that perpetuate violence but also aligns with the overarching feminist goal of safeguarding women's rights within these cultural contexts.

Yesufu (2022) echoes feminist perspectives by framing domestic violence as an outcome of living in patriarchal societies deeply rooted in male dominance, encapsulated within long-standing social-cultural values. Building on this view, Tenkorang et al. (2013) assert that feminist explanations of domestic and marital violence pivot around patriarchal structures, male dominance, and control. In essence, violence against women is portrayed as a manifestation of unequal power relations structurally embedded in a patriarchal system. In the South African context, alongside the feminist critique emphasizing the patriarchal roots of gender-based violence, cultural feminism emerges as a parallel discourse that applauds the positive attributes associated with the feminine character. This theory, as articulated by Bingham et al. (2009), extols the virtues traditionally associated with women, recognizing and valuing characteristics deemed inherently feminine. However, this seemingly positive acknowledgment comes with a burdensome consequence, reinforcing stereotypical gender roles, notably the expectation that women bear the primary responsibility for childcare. Throughout South Africa, the visible image of women carrying babies swaddled in blankets on their backs reflects the societal adherence to these gendered norms.

Patriarchy, as the dominant structure governing family dynamics, establishes the authority of men and fathers. This entrenched rule leads to the imposition of male-oriented norms, relegating women to second-class citizenship (Coker-Appiah 2020). In this patriarchal system, women are systematically trained to internalize beliefs of inferiority and incapacity (Baloyi 2022), fostering pervasive feelings of inadequacy regarding their appearance, intelligence, and worth. Bingham et al (2009) highlight that these deeply ingrained sentiments hinder women from pursuing lives of freedom and fulfillment. This intricate interplay of cultural feminism and patriarchal norms in South Africa underscores the complex terrain that feminists navigate in their quest to challenge and dismantle patriarchal systems. While cultural feminism acknowledges positive attributes, its inadvertent reinforcement of traditional gender roles contributes to the perpetuation of systemic inequalities. This not only aligns with the feminist perspective on challenging patriarchal systems but also highlights the urgent need to unravel and redefine societal norms that impede women's rights, fostering a more equitable and liberating future.

Similarly, patriarchy manifests in various facets of Ghanaian society, influencing cultural norms, access to resources, and power dynamics. Women face systemic discrimination and limited opportunities due to patriarchal norms that uphold male authority (Sikweyiya et al.2020). In traditional leadership systems of many Ghanaian communities, chiefly positions are predominantly held by men, excluding women from

decision-making roles (Diko 2023). This exclusion perpetuates gender disparities in governance and reinforces male authority. Again, gender-based violence remains a significant concern in Ghana, reflecting the deeply ingrained patriarchal norms. More worrying are barriers which hinder women from accessing resources such as land and credit, restricting their economic independence (United Nations 2020; Agarwal 2018). For instance, under customary laws, women may have limited inheritance rights compared to men, reinforcing gender-based economic inequalities. Feminist perspectives emphasize the importance of legal reforms and economic policies that address these disparities, ensuring equal access to resources and opportunities (Dery 2020). Again, despite progress in education access, gender gaps persist, especially in rural areas (Ghana Statistical Service 2015; Ghana Statistical Service 2017). Societal expectations often prioritize boys' education over girls', perpetuating unequal opportunities (Antwi 2018). Moreover, traditional media often reinforce gender stereotypes, portraying women in limited roles, while men are depicted in positions of power and authority. Efforts to challenge patriarchal systems in Ghana are gaining momentum through the work of feminist organizations and activists. For instance, the Women in Law and Development in Africa (WiLDAF) and the Ghana Feminist Forum actively engage in advocacy, awareness campaigns, and policy interventions to address gender inequalities. These initiatives aim to transform societal attitudes, challenge discriminatory laws, and foster a more inclusive and equitable environment for women in Ghana.

Failures of the justice system

In both Ghana and South Africa, the pursuit of justice for victims of gender-based violence reveals a distressing narrative of systemic shortcomings. Despite the noble principles enshrined in the South African legal system, as outlined in the 1996 Constitution, the actualization of these rights faces a stark challenge in the form of a pronounced gap between legal frameworks and their enforcement (The Cape Agus 2023; The Star 2023). This disconnection manifests in many ways, ranging from biased policing to overworked courts (Dome and Amoah 2022). The police, often the initial point of contact for women seeking refuge from violence, unfortunately, contribute to the disillusionment faced by survivors. Accounts of a failing system, infected by stereotypes, biased law enforcement, and lengthy court proceedings, echo through the narratives of those who dare to report (Commonwealth 2020). Disturbingly, the legal journey for survivors transforms them into vulnerable witnesses, frequently intimidated by their abusers and discredited by the defense, even if the case reaches the courtroom. The consequences of non-conviction exacerbate the vulnerability of victims to recurring violence, creating a vicious cycle of re-victimization. Trapped in a culture of impunity, fear, and shame, a significant majority of gender-based violence incidents go unreported, unveiling a pervasive crisis that demands urgent attention and comprehensive reforms (Commonwealth 2020).

The escalating number of women abuse cases and the distressing mortality rate paint a disconcerting picture, leaving an unsettling impression that women are not adequately protected. More (2014) underscores the ineffectiveness of the legislative framework designed to combat domestic violence, signaling a systemic failure that perpetuates the serious issue of violence against women with severe consequences for their health and well-being. More (2014) analyzes the justice system's role in assisting abused women, highlighting Violence Act of 119's inadequacy and its failure to provide adequate protection orders. Compounding this issue is the reluctance of women to report sexual abuse by intimate partners, driven by the belief that such reports won't be taken seriously. The disheartening reality is exacerbated by instances where the police downplay the seriousness of these reports, creating an environment that fosters perpetrators to get away with wrongdoing.

In Ghana, while the country has ratified international conventions and developed legal frameworks to protect women from discrimination and violence, challenges persist at the grassroots level, including inadequate resources, lack of awareness, and societal norms that undermine the efficacy of these laws. Additionally, customary laws often intersect with statutory laws, leading to inconsistencies and sometimes conflicting protections for women, particularly in areas such as inheritance, land rights, and marital issues.

This duality of legal systems creates ambiguity and unequal treatment, leaving women vulnerable to discriminatory practices and limiting their access to justice.

Critique of legal response to gender-based violence

The existing legal frameworks in both countries underscore a concerning gap in the justice system, particularly in addressing gender-based violence against women. The Media Foundation for West Africa's (2021) insights into Ghana reveals that despite the enactment of policies and regulations, there remains a glaring inadequacy in comprehensive protection for citizens. This deficiency is notably pronounced in the targeted abuse against women, as highlighted by Dowuoana-Hammond et al. (2022), who emphasize the enduring harmful customary practices and gender inequality that persist beyond the reach of existing, largely unenforced laws. Turning to South Africa, although the Constitution articulates robust rights for women, the disconnect between legislative intent and practical implementation is evident. Yesufu's (2022) observation points to the increasing prevalence of gender-based violence, prompting a heightened focus on law enforcement. This shift in attention implies a recognition that, despite commendable legal strides, the justice system has struggled to effectively curb gender-based crimes.

Considering the above-mentioned, it is crucial to delve deeper into the specific challenges women face in seeking justice. Instances of traumatizing threats and physical harm, as outlined by Dowuoana-Hammond et al. (2022), exemplify the urgent need for a justice system that not only criminalizes such acts but also ensures swift and decisive punishment for perpetrators. The failure to address sustained harmful customary practices underscores a systemic flaw that requires more than nominal legal reforms. In South Africa, the dissonance between constitutional guarantees and the reality of gender-based violence demands a critical examination of enforcement mechanisms. The increase in reported cases, as highlighted by Yesufu (2022), signals a failure in deterring potential offenders and protecting victims adequately. Strengthening the justice system involves addressing not only the legal framework but also systemic issues, such as cultural norms and societal attitudes, which perpetuate an environment conducive to gender-based violence. Additionally, Diko (2023) argues that the brutal murders of young girls in South Africa represent a profound threat to the country's constitution and democracy. These heinous acts not only compromise the principles of justice, human rights, and the rule of law but also undermine the fundamental tenets of a democratic society. In essence, such egregious crimes contribute to a manifestation of systemic failures in the justice system. This means that the impact of these brutal murders extends beyond the immediate loss of life, transcending into a broader infringement of women's rights. The failure to adequately address and prevent these crimes reflects a deep-rooted issue in safeguarding the well-being and security of women in South Africa. The violation of their right to life, as enshrined in the Constitution, emphasizes the urgent need for comprehensive reforms in the justice system.

Similarly, while Ghana has laws criminalizing various forms of gender-based violence, including the Domestic Violence Act of 2007, implementation at the grassroots level often faces challenges. This is evident in limited resources allocated to support victims, lack of trained personnel to handle cases sensitively, and systemic issues leading to delays or dismissals in legal proceedings. As a result, many survivors of gender-based violence encounter barriers in accessing justice and support, undermining the intended protections offered by the legal framework. Again, cultural and societal attitudes tend to hinder effective response to gender-based violence. Traditional beliefs and societal norms sometimes influence how cases are handled, leading to victim-blaming, reluctance to report incidents, or community pressure against pursuing legal action. This creates an environment where survivors might feel discouraged from seeking help or justice. This paper argues that cultural sensitivity is necessary in addressing gender-based violence, but it should not impede the full application of the law to protect survivors and hold perpetrators accountable. Efforts to combat gender-based violence in Ghana require not just legal reforms but also comprehensive strategies that challenge ingrained cultural perceptions and promote a more supportive and empowering environment for survivors.

Difficulties in reporting and prosecuting cases

Masson (2022) underscores the challenges within South African police stations regarding gender-based violence cases. Victims face difficulties as a result of a high withdrawal rate, limited expertise in using rape kits, and prolonged DNA analysis processes. Additionally, factors like poverty and geographic distance exacerbate hurdles for victims to access justice, thereby contributing to a system that inadequately addresses gender-based violence in South Africa. The United Nations Office on Drug and Crime (UNODC) (2021) highlights the double victimization of individuals reporting violent cases, particularly in the context of South Africa. Despite high reporting rates, the justice system fails to deliver justice and services sought by victims, eroding trust and confidence. This systemic failure not only leads to underreporting but also perpetuates an alarming increase in violent crimes against women, emphasizing the urgent need for comprehensive reforms.

The prevalence of culture of intimidation, fear of reprisal, and traditional norms/customs often discourage South African women from speaking out against abuse due to concerns about being ostracized or facing community backlash. This fear of judgment and societal scrutiny often prevent survivors from reporting incidents or pursuing legal action, perpetuating a culture of silence around gender-based violence. A study by the UN and Human Rights Watch has highlighted how societal attitudes and victim-blaming mentalities contribute to these challenges, deterring women from seeking recourse through legal channels (United Nations and Human Rights Watch 2023). Most survivors, especially from poor households, have had to contend with challenges including resource constraints, long delays in court proceedings, insufficient support services, and at times, insensitive treatment by law enforcement and judicial officials.

With respect to Ghana, Kabun and Kabun (2023) provide insights into the challenges faced by survivors. Delays within the justice system, especially in domestic violence cases, contribute to frustration and hinder the adjudication process. Furthermore, survivors face discouragement due to the unprofessional conduct of officials, including trivializing cases and inducements by abusers. This unfavorable reception at police stations acts as a deterrent, hindering women from seeking justice for domestic violence in Ghana (Kaburi and Kaburi 2023).

In specific instances of GBV in Ghana, particularly when the perpetrator is a relative or holds societal prominence, legal proceedings are often circumvented (Adelakun 2021). Instead, such cases tend to be treated as family matters, seeking resolution through alternative dispute resolution methods. The decision to pursue prosecution relies heavily on the complainant's ability to engage the involved police officers or department, introducing the risk of improper investigation or prosecution if the complainant is unable or unwilling to do so. This approach has been observed in reported cases where perpetrators manipulated complaints, leading to the abandonment of the initial grievance. The procedural complexities involved in filing complaints, obtaining medical reports, apprehending perpetrators, and advancing cases to court pose significant barriers, discouraging survivors from seeking justice. Instances of bribery have also been reported, with reluctant police allegedly demanding payment before taking action. These challenges underscore concerns about the effectiveness, fairness, and sensitivity of the legal system in Ghana in addressing GBV cases, (Adelakun 2021), potentially leaving survivors further marginalized.

Feminist critique of the justice system

Fu (2015) underscores the limiting strategies for addressing violence against women that heavily rely on the state and the criminal justice system, asserting that such approaches often perpetuate violence against women of color. This perpetuation not only fails to safeguard the rights of women but actively infringes upon them, particularly for women of color who find themselves double marginalized. Feminist analysis emphasizes the necessity of broadening the understanding of gender-based violence beyond the scope of men's violence against women. The advocacy for more gender-sensitive legal procedures, initially aimed at combatting male violence, should evolve into a comprehensive movement striving to eradicate all forms of violence as articulated by Fu, recognizing that the current system contributes to the infringement of

women's rights. Albetyn (2004) adds that feminists recognize the gendered power dynamics within the legal system, acknowledging its potential to either harm or improve women's lives. However, the prevailing biases in the legal framework often lead to the infringement of women's rights, as these systems may perpetuate harmful gender stereotypes and hinder the pursuit of justice for women. Gruber (2009) sheds light on the evolving identification of feminism with crime control and the prosecution of men who commit offenses against women. However, Gruber points out the challenge of these critiques existing at a high level of abstraction, often entangled in classic feminist dilemmas. This includes the tension between treating women as autonomous agents while acknowledging the broader constraints of societal subordination, emphasizing how such dilemmas perpetuate a system that infringes on women's rights. Matadi and Calvino (2022) deepen the critique by highlighting the historical use of law as a tool for the subordination of women. Despite the seemingly neutral facade of the law, the reality exposes a bias in favor of men, affirming their socially and economically dominant position across various spheres of society. This feminist analysis unveils inherent inadequacies and biases within the justice system, urging a transformative shift towards a more inclusive and equitable legal framework that truly respects and upholds the rights of women.

Call to action: Feminist perspective

Feminism stands as a global movement committed to securing the liberation of women from various manifestations of oppression. Its overarching goal is to cultivate unity among women across diverse backgrounds and nationalities (Bayu 2019). This movement seeks not only to address the diverse challenges women face but also to foster a sense of solidarity that transcends geographical boundaries, recognizing that the struggle for women's freedom is a shared endeavor that extends across all walks of life and nations. In the dynamic tapestry of combating violence against women in the African contexts of Ghana and South Africa, the lens of intersectionality emerges as a powerful tool, refracting the diverse experiences and identities that shape the narrative of gender-based violence. Rooted in the tenets of black feminism, intersectionality transcends the limitations of mainstream approaches, urging us to dismantle the one-size-fits-all paradigm and delve into the intricate intersections of race, gender, class, and more (Buiten and Naidoo 2020). As societies navigate the complexities of these African landscapes, it becomes evident that understanding violence against women requires moving beyond surface-level analyses.

Society must recognize that gender-based violence, in all its forms, is a violation of human rights and a symptom of deeply entrenched patriarchal norms. It's not enough to merely acknowledge its existence; stakeholders must actively work to dismantle the systems that perpetuate it. This requires comprehensive strategies that address the root causes of violence, challenge traditional gender roles, and empower women to assert their autonomy. Women from marginalized communities face compounded barriers and are disproportionately affected by violence. Any effective response must center the experiences and voices of these women, ensuring that they are not left behind or overlooked. Therefore, the intersectionality of gender-based violence with other forms of oppression, such as racism, classism, and ableism. This review unveils a unique tapestry where the voices of Ghanaian and South African women weave into a narrative that not only acknowledges their struggles but embraces the interconnectedness of their experiences. Intersectionality, as elucidated by Crenshaw (2019), emerges as a pivotal framework for comprehending and combatting violence against women, unraveling the intricate tapestry of interconnected social identities and systems of oppression that contribute to the violation of their rights. Crenshaw underscores that diverse forms of inequality coalesce, intensifying each other. She particularly highlights the often-overlooked experiences of black women confronting rape and sexual discrimination within the legal system, where their struggles remain inadequately acknowledged.

However, a critical perspective on this concept posits that neglecting the distinct and compounded challenges faced by women most impacted by gender-based violence, often residing in impoverishment and marginalization (Department of Women, Youth and Persons with Disabilities 2020), limits our understanding of their experiences. The quote acknowledges that these social inequalities are not isolated;

rather, they intersect and can concurrently shape a woman's experience. Crenshaw's call to discern how the system produces these inequalities aligns with the understanding that violence against women is not a singular issue but a result of intersecting oppressions. Introducing the concept of "structural intersectionality," Crenshaw illustrates how oppression rooted in race, gender, class, and national origin, emanating from both the state and interpersonal relationships, places immigrant women of color in South Africa and Ghana at the greatest risk of violence (Runyan 2018). This underscores the urgency to unravel the complexities of intersectionality to comprehensively address the various dimensions of violence against women in these diverse African contexts. In the pursuit of dismantling patriarchy, Runyan (1991) echoes Crenshaw's insights, emphasizing the necessity of dislocating men from masculinity and women from femininity, particularly within the unique socio-cultural landscapes of South Africa and Ghana. Recognizing gender as socially produced and interconnected with other forms of oppression enables a more comprehensive understanding of how violence against women is deeply rooted in overlapping social inequalities in these African nations.

Emerging lessons: Ghana and South Africa cases

In both Ghana and South Africa, women have grappled with persistent challenges in their pursuit of gender equality, encountering barriers such as unequal access to education, limited economic opportunities, and the pervasive scourge of gender-based violence. Despite both nations experiencing high levels of gender-based violence, reflecting broader societal issues, there has been a surge in activism and awareness campaigns against violence. However, the prevalence of these issues underscores the ongoing struggles for the safety and well-being of women in both countries. The acknowledgment that violence against women is a global human rights violation (Poix et al. 2022) resonates with the shared struggles faced by women in Ghana and South Africa. Traditional and patriarchal norms, characterized by male dominance and control, present pervasive challenges to women's rights in both nations. The expectation for women to be submissive is deeply ingrained, shaping their experiences from a young age. In Ghana, gender-based violence (GBV) manifests in various forms including rape, domestic violence, female genital mutilation, forced marriages, intimate partner violence, widow-shaming, and forced prostitution (Adelakun 2021). These manifestations highlight the multifaceted challenges women face, emphasizing the need for comprehensive solutions to address the diverse forms of GBV. Similarly, in South Africa, GBV takes alarming forms, with rape, femicide, domestic violence, sexual violence, physical violence, and emotional violence being prominently recorded (The Star 2023; The Cape Argus 2023; Feimster 2009). The stark reality of these challenges underscores the severity of the issues, emphasizing the myriad threats to women's safety.

Despite the common struggles, South Africa has made significant strides in women's political representation, boasting a relatively high percentage of women in parliament (STATS SA 2017; Parliament of South Africa 2023). In Ghana, women's participation in politics remains disappointingly low, reflecting a global trend, with less than 27 percent of women in parliament worldwide (Odame 2010; Awusi 2023). Varying political will and commitment to gender equality impact the advancement of women's rights in both countries. Regarding economic opportunities, South African women have made notable strides in the workforce (Parry 2021), but gender wage gaps persist (Mosomi 2019). In Ghana, economic opportunities for women are expanding, yet challenges such as limited access to credit and entrepreneurship barriers hinder progress (Mensah 2022). Abede and Jepkiyen (2016) underscore the imperative to end violence against women, positioning it as a priority for the overall development, peace, and security of countries. This highlights the profound societal impact and interconnectedness of eradicating gender-based violence. Their emphasis on it being everyone's business, as articulated by UN Women (2022), reinforces the collective responsibility to foster a safe and equitable society.

In the South African context, Du Plessis (2019) illuminates the significance of confronting systemic issues that perpetuate gender inequalities. The lens of Ubuntu feminism offers a holistic approach, aligning with

the need for comprehensive strategies to dismantle deeply ingrained norms and structures that contribute to gender-based violence. Safro-kantankah's (2022) revolutionary approach in Ghana, focusing on reporting domestic abuses and imposing penalties, aligns seamlessly with recommendations for a deterrent effect. This proactive stance not only addresses the immediate issues but also contributes to changing societal perceptions and expectations regarding gender-based violence. UN Women's (2022) stress on recognizing various forms of violence and combating toxic masculinity aligns with the need for nuanced interventions. In raising awareness about the multifaceted nature of violence and challenging toxic masculinity, societal attitudes can shift, creating an environment less tolerant of gender-based violence.

International Planned Parenthood Federation's (2021) advocacy for listening to survivors, challenging norms and increasing visibility, speaks to the importance of amplifying the voices of those affected. This approach not only validates survivors' experiences but also contributes to dismantling the culture of silence surrounding gender-based violence in both South Africa and Ghana. The Young African Leaders Initiative's (2015) promotion of education, women's economic empowerment, and public awareness aligns with the multifaceted approach needed to address the root causes of gender-based violence. Education equips individuals to challenge norms, economic empowerment enhances women's autonomy, and public awareness fosters a culture intolerant of gender-based violence. Ndedi's (2020) emphasis on raising awareness, training first responders, and reinforcing women's autonomy resonates with the need for a comprehensive support system. Ensuring that those at the forefront of responding to gender-based violence are equipped with the necessary skills and understanding reinforces a coordinated and effective approach to combat gender-based violence in both Ghana and South Africa.

Conclusion

Ghana and South Africa, though distinct in trajectories, share a common commitment to advancing gender equality and women's empowerment. This review explored women's struggle against gender-based violence, contextualizing them within each country's historical, sociocultural, and legal contexts. The feminist perspective offered a critical lens for understanding and addressing the pervasive issue of patriarchal systems and gender-based violence in both Ghana and South Africa. Rooted in the recognition of historical and societal norms that perpetuate systemic inequalities, feminism advocates for transformative change to dismantle structures reinforcing gender-based oppression. Through analysis of the cultural, legal, and societal dynamics, feminist scholars highlight the intersections of tradition, religion, and violence, emphasizing the urgent need to challenge and redefine norms that impede women's rights.

In both countries, patriarchal systems manifest in various facets of society, influencing cultural norms, access to resources, and power dynamics. Women face systemic discrimination and limited opportunities due to entrenched norms that uphold male authority. Gender-based violence remains a significant concern, reflecting the deeply ingrained patriarchal norms and systemic failures of the justice system. The legal and policy response to gender-based violence reveals deficiencies between legislative frameworks and their enforcement, highlighting biases, systemic shortcomings, and cultural barriers that hinder access to justice for GBV survivors. Moreover, challenges in reporting and prosecuting cases further exacerbate the issue, perpetuating a culture of silence and impunity. Feminists call society to action, emphasizing the necessity for comprehensive strategies that address the root causes of gender-based violence, challenge traditional gender roles, and empower women to assert their autonomy.

Emerging lessons from both countries underscore the importance of political will, economic empowerment, and societal awareness in combating gender-based violence. Amplifying the voices of survivors, challenging norms, and increasing visibility are crucial steps toward fostering a culture that is intolerant of gender-based violence. In essence, the feminist perspective on patriarchal systems provides a roadmap for dismantling systemic inequalities and fostering a more equitable and inclusive future where all individuals

can live free from violence and oppression. Moving forward, stakeholders in both countries must prioritize the voices and experiences of survivors, challenge harmful norms and stereotypes, and work towards building a more equitable and just society for all. This requires not only legal reforms and policy interventions but also broader societal shifts in attitudes and beliefs surrounding gender and power. Ultimately, the fight against gender-based violence is a shared responsibility that demands collective action and solidarity across all sectors of society.

Policy recommendations

The review exposes the social, economic, cultural, and justice system failures in both Ghana and South Africa, laying the groundwork for recommendations to strengthen women's struggle against GBV. For Ghana, the review demonstrates a pressing need to fortify legal frameworks by enacting and enforcing laws specifically targeting gender-based violence (GBV) and harmful traditional practices. Evidence suggests that robust legal protections and strict enforcement can significantly reduce the incidence of GBV (WHO 2021). This entails amending existing legislation to provide better protection for victims and harsher penalties for perpetrators. Countries like Spain, with its comprehensive Organic Act on Integrated Protection Measures against Gender Violence, have demonstrated the effectiveness of such laws (Bosch-Fiol and Ferrer-Perez 2012). Moreover, educational reforms should be prioritized to promote gender-sensitive schooling. Therefore, initiatives aimed at increasing girls' enrollment and retention rates are crucial (UNESCO 2019). This involves implementing scholarships, establishing mentorship programmes, and addressing cultural barriers to education. Evidence from the “*Girls Who Code*” initiative in the United States demonstrates that targeted programmes can significantly increase female participation in Science, Technology, Engineering and Mathematics -STEM fields (Reshma 2019), suggesting similar approaches could be effective for Ghana.

Economic empowerment programmes must be expanded to offer women access to microfinance, vocational training, and entrepreneurship support. In Ghana, these initiatives should particularly focus on marginalized groups such as rural women and women with disabilities (UNDP 2020). Evidence from microfinance programmes in Bangladesh shows that providing financial resources and training to women can lead to significant improvements in their economic status and overall empowerment (Khandker 1998). Additionally, public awareness campaigns are essential to challenge harmful gender norms and stereotypes. In Ghana, these campaigns should utilize various mediums such as media, community workshops, and educational programmes in schools. The HeForShe campaign, launched by UN Women, has effectively engaged communities worldwide in promoting gender equality (UN Women, 2014) and can serve as a model for similar efforts in Ghana. Again, improving access to support services for GBV survivors is crucial. In Ghana, this includes shelters, counseling, livelihood support, and legal assistance. Strengthening partnerships with civil society organizations and increasing funding for GBV response initiatives are necessary steps. Evidence from the United States demonstrates that comprehensive support services such as those provided by the National Domestic Violence Hotline, significantly improve outcomes for survivors and thus, could be replicated in Ghana (National Domestic Violence Hotline 2019).

In South Africa, the focus should be on strengthening the implementation of existing laws, such as the Domestic Violence Act and the Sexual Offences Act (South African Law Reform Commission 2020). Improved coordination between government agencies, law enforcement, and civil society organizations is essential to ensure effective enforcement. Examples from countries like Sweden show that strong institutional cooperation can lead to better outcomes in addressing GBV (European Institute for Gender Equality 2019). The country should introduce gender-sensitive education programmes in schools to challenge harmful stereotypes and promote gender equality from an early age. Incorporating gender studies into the curriculum and providing training for teachers on gender-responsive teaching methods can help

achieve this. Countries like Rwanda have successfully integrated gender equality into their educational systems, resulting in increased female enrollment and retention rates (Ministry of Education, Rwanda 2018).

Again, the government of South Africa should consider expanding economic empowerment programmes to provide women with access to skills development, credit, and support for women-owned businesses, especially in sectors where women are underrepresented. Successful models like the Grameen Bank's microfinance programmes (Yunus 2007), can serve as templates for developing similar initiatives in South Africa. Moreover, the country should develop programmes to engage men and boys as allies in the fight against GBV and promote positive masculinity. Community-based initiatives, media campaigns, and male-focused support services can help achieve this. Programmes like MenEngage Africa have shown success in changing attitudes and behaviours related to gender violence and masculinity (MenEngage Africa 2021). Similarly, there is a need to strengthen support services for GBV survivors by expanding the network of shelters and crisis centers and providing training for service providers on trauma-informed care. Best practices from countries like Canada, which has a robust network of support services for GBV survivors, can guide these efforts (Canadian Women's Foundation 2020). For both countries, it is suggested that relevant stakeholders, including women's organizations, employers, educational institutions, governments, and international bodies, should play crucial roles in addressing the issues women face. Women's organizations should advocate for legal reforms, support female candidates in politics, and monitor the implementation of gender-sensitive policies (Amnesty International 2021). For instance, in India, "Women Power Connect" has been instrumental in advocating for laws against domestic violence. Their efforts contributed to the enactment of the Protection of Women from Domestic Violence Act in 2005. Moreover, employers should adopt family-friendly workplace policies and conduct regular pay audits to ensure gender parity (ILO 2018). Meanwhile, educational institutions should develop programmes encouraging female participation in traditionally male-dominated fields and provide training for teachers on gender-responsive methods (UNESCO 2019). Governments of both countries must be committed to enforcing labour laws, providing incentives for companies to adopt best practices, and facilitating public awareness campaigns (United Nations 2020; World Bank 2019).

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