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LEGAL RESPONSES TO GENDER-BASED VIOLENCE: A COMPARATIVE ANALYSIS OF NIGERIA AND THE UNITED KINGDOM

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Abstract

Gender-based violence (GBV) is simultaneously a criminal justice issue, a public health crisis, and a profound human rights violation. This paper offers a comparative analysis of Nigeria and the United Kingdom (focusing on England and Wales), examining how law constructs, prevents, prosecutes, and remedies GBV. It integrates doctrinal analysis of statutes and appellate case law with feminist legal theory and human rights jurisprudence, and situates legal frameworks within statistical evidence on prevalence and justice outcomes. The central argument is that 'law on the books' does not automatically translate into safety or equality: effective GBV regulation depends on state capacity, institutional design, evidential practices, survivor-centred procedure, and accountability mechanisms that align with due diligence obligations under international law. Nigeria's VAPP Act offers an ambitious framework but is constrained by federalism-driven uneven domestication, resource shortages, and inconsistent judicial and police practice. The UK has a more consolidated architecture—consent-based sexual offences law, the coercive control offence, and the Domestic Abuse Act 2021—supported by comparatively robust data systems and oversight; yet it still faces attrition, contested evidential cultures, and systemic barriers for marginalized survivors. The conclusion proposes reforms aimed at harmonized legal coverage, evidence-led and trauma-informed practice, stronger protection-order enforcement, consistent sentencing rationales, and transparent data for both jurisdictions.

Keywords: Gender-Based Violence, Human Rights, Criminal Justice, Nigeria, United Kingdom

1. Introduction

Gender based violence (GBV) is violence committed against a person because of his or her sex or gender.[2] It entails coercing another individual to do something contrary to his or her will through violence, coercion, threats, deception, cultural expectations, or economic means. GBV includes intimate partner violence, sexual violence, coercive control, stalking and harassment, forced marriage and harmful practices.[3] Both Nigeria and the UK formally condemn GBV, yet persistently high prevalence indicates a gap between normative commitments and lived reality. Nigeria's contemporary legal response is anchored by the VAPP Act, while the UK response is shaped by a consent-based sexual offences framework,[4] the coercive control offence,[5] and the Domestic Abuse Act 2021[6].

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[2] UNHCR, 'What is Gender Based Violence.' https://help.unhcr.org/turkiye/services-in-turkiye/information-and-resources-on-protection-from-violence/what-is-gender-based-violence/ retrieved on April 25, 2026.

[3] UN Women, 'FAQs: Types of violence against women and girls.' https://www.unwomen.org/en/articles/faqs/faqs-types-of-violence-against-women-and-girls&ved=2ahUKEwizvorv4oiUAxV5VkEAHSeqAQcQFnoECCIQAQ&usg=AOvVaw2sedmD-ZbVIfEaulfLtk2Q retrieved on April 25, 2026.

[4] Sexual Offences Act 2003 (UK).

This research investigates how the law responds to GBV across the 'full pathway': prevention, reporting, investigation, prosecution, sentencing and protection—through a comparative lens. The comparison is valuable because the jurisdictions are structurally distinct. Nigeria's federal and plural legal order disperses criminal justice authority between federal and state institutions and interacts with customary and religious norms. By contrast, England and Wales operate a more centralized criminal justice system with stronger national guideline architecture and extensive administrative datasets. The paper argues that these structural differences affect: the coherence of GBV definitions and offences; access to protection orders and survivor support; evidential and prosecutorial decisions; and the capacity to monitor performance through data.

The study is also explicitly theoretical. Feminist legal scholarship has long argued that traditional criminal law individualizes violence and overlooks structural gender power, while human rights law frames GBV as discrimination and demands state due diligence.[7] These perspectives provide evaluative criteria for domestic law reform and implementation.

2. Methodology and Comparative Approach

The paper adopts a mixed doctrinal–socio-legal methodology. First, it provides doctrinal analysis of legislative texts and leading appellate decisions in each jurisdiction. Second, it synthesizes empirical evidence on GBV prevalence and criminal justice 'attrition'—the progressive fall-off from reports to charges to convictions—to evaluate whether legal reforms are associated with improved outcomes. Third, it uses feminist legal theory and human rights due diligence as interpretive lenses to assess whether legal responses address structural inequality and state responsibility.

Comparative work risks false equivalence: offence definitions, reporting cultures, and data quality differ. Rather than asserting numerical equivalence, the analysis compares functional mechanisms—how each system defines GBV, gathers evidence, uses protection orders, and structures discretion. It also takes seriously the 'implementation gap': law may be formally progressive yet ineffective if institutions lack resources or if legal actors reproduce stereotypes.

3. Conceptual and Theoretical Framework

Feminist legal theory highlights that violence is not merely interpersonal; it is embedded in gendered power relations. MacKinnon argues that law historically mirrored male dominance and treated women's injury as private or naturalised[8]. Smart adds that law's claim to neutrality can reproduce hierarchy by defining harms through male experience.[9] Fineman's vulnerability theory reframes equality around universal human vulnerability and a responsive state duty to build resilience-supporting institutions.[10]

These theories illuminate doctrinal debates. For example, a narrow, incident-focused approach to domestic abuse can miss coercive control, the patterning of domination that makes 'choice' illusory. Stark's work on coercive control conceptualizes domestic abuse as liberty crime—

[5] Serious Crime Act 2015 (UK) s 76 (controlling or coercive behaviour).
[6] Domestic Abuse Act 2021 (UK).
[7] T Deane, 'Gender-Based Violence in International Human Rights Law – The Efficacy of the United Nations Human Rights Legal Framework and CEDAW in Addressing the Issue.' https://revistaselectronicas.ujaen.es/index.php/TAHRJ/article/view/8662/8888 retrieved on April 25, 2026.
[8] C. A. MacKinnon, *Toward a Feminist Theory of the State* (Harvard UP 1989) 1.
[9] C Smart, *Feminism and the Power of Law* (Routledge 1989) 1.
[10] M. A. Fineman, 'The Vulnerable Subject: Anchoring Equality in the Human Condition' (2008) *20 Yale Journal of Law & Feminism, 1*.

entrapment through micro-regulation, isolation and threats—rather than discrete assaults[11]. UK law's explicit coercive control offence can be read as a partial legal translation of this theory, while Nigeria's VAPP Act criminalizes a broad range of harms but does not build an equally developed doctrinal account of pattern-based coercion into policing and proof.

Intersectionality matters, Crenshaw shows that gender violence is experienced differently at the intersections of race, class, migration and disability, and legal responses can fail if they assume a unitary 'woman victim'.[12] Comparative analysis must therefore consider how each jurisdiction's institutions deal with diversity—e.g., language access, immigration vulnerability, poverty, and stigma.

Finally, human rights scholarship increasingly frames GBV as discrimination requiring due diligence. Chinkin emphasizes CEDAW's role in developing a state-responsibility model for violence and in linking GBV to substantive equality.[13] This provides a normative benchmark for evaluating domestic frameworks.

4. International Human Rights Standards and Due Diligence

Convention on the Elimination of All Forms of Discrimination against Women obliges states to eliminate discrimination and has been interpreted to require robust action against GBV[14]. The CEDAW Committee's General Recommendation No 35 consolidates the due diligence standard: states must prevent, investigate, punish and provide remedies for GBV by state and non-state actors. The Istanbul Convention goes further in detailing integrated policy duties—prevention, protection, prosecution and coordinated policies—and has become a European benchmark.[15]

Human rights jurisprudence has reinforced due diligence. In *Opuz v Turkey*,[16] the European Court of Human Rights (ECtHR) held that systemic failure to protect a woman from domestic violence could violate rights to life and to be free from inhuman or degrading treatment and amount to discrimination. Later cases such as *Eremia v Moldova* and *Talpis v Italy*[17] developed the logic: ineffective protection orders, dismissive policing, and inadequate prosecution can engage state responsibility,[18]

Nigeria is not under ECtHR jurisdiction, but due diligence norms influence global standards and regional interpretation. Nigeria is party to the Maputo Protocol[19], which recognizes women's rights to dignity, integrity and protection from violence. The key question is domestication and operationalization: international obligations must be translated into enforceable domestic law, institutions and budgets. In the UK, Istanbul Convention ratification in 2022 intensified scrutiny

[11] E Stark, *Coercive Control: The Entrapment of Women in Personal Life* (OUP 2007), 1.
[12] K Crenshaw, 'Mapping the Margins: Intersectionality, Identity Politics, and Violence against Women of Color' (1991) *43 Stanford Law Review 1241.*
[13] C Chinkin, 'CEDAW: Its Contribution to the Elimination of Violence against Women' (2012) 8 *European Human Rights Law Review* 1.
[14]Convention on the Elimination of All Forms of Discrimination against Women (adopted 18 December 1979, entered into force 3 September 1981) 1249 UNTS 13 (CEDAW).
[15] Council of Europe Convention on preventing and combating violence against women and domestic violence (opened for signature 11 May 2011, entered into force 1 August 2014) CETS.
[16](2009) 50 EHRR 28 (ECtHR).
[17] no. 41237/14, ECHR 2017.
[18]App no 3564/11 (ECtHR, 28 May 2013).
[19] Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (adopted 11 July 2003, entered into force 25 November 2005) (Maputo Protocol).

of law, policy and service provision, especially on prevention and victim support.[20] However, ratification does not itself fix attrition. Compliance depends on sustained funding and institutional practice.

5. Nigeria: Constitutional, Statutory and Jurisprudential Responses

5.1 Constitutional and Criminal-Law Baseline

The Nigerian Constitution protects dignity and non-discrimination.[21] Yet, for much of Nigeria's postcolonial history, GBV regulation occurred indirectly through general offences in the Criminal Code and Penal Code[22],

The traditional rape definition and evidential expectations shaped outcomes. Supreme Court and Court of Appeal decisions repeatedly addressed corroboration and credibility. In *Iko v State*,[23] the Supreme Court examined corroboration and highlighted the need for careful evaluation of evidence in sexual offence prosecutions. In *Upahar v State*,[24] the Court reaffirmed core proof requirements and the role of medical and circumstantial evidence.

A key doctrinal development is the modern rejection of rigid corroboration rules. In *Posu v State*, the Supreme Court emphasized that corroboration is not a legal necessity where the complainant's evidence is credible and cogent[25]. This is important for GBV because over-reliance on corroboration systematically disadvantages survivors where assaults occur in private.

Nonetheless, doctrinal progress coexists with practical barriers: delayed reporting, limited forensic capacity, stigma and intimidation can undermine the evidential record. The gap between doctrinal permissibility and institutional capability is a recurring theme.

5.2 The VAPP Act 2015: Innovations and Limits

The VAPP Act represents Nigeria's most comprehensive statutory attempt to regulate GBV[26]. It expands categories of prohibited violence, recognizes psychological and economic abuse, prohibits harmful practices (including female genital mutilation (FGM)), and provides for protection orders and compensation. It can be read as partially aligning Nigeria's domestic framework with due diligence expectations under CEDAW GR35 by extending the state's remedial toolbox beyond imprisonment to protective and compensatory remedies[27].

However, federalism shapes reach. Federal legislation applies directly primarily within the Federal Capital Territory unless states adopt analogous statutes. This produces a 'postcode lottery' in access to remedies, definitions and procedural pathways. For survivors, legal geography becomes destiny: reporting and protection may be stronger in states with domesticated VAPP-style laws, specialized units and functioning shelters.

[20] No 210 (Istanbul Convention).
[21] Constitution of the Federal Republic of Nigeria 1999 (as amended) ss 34, 42.
[22] Criminal Code Act, Cap C38 Laws of the Federation of Nigeria 2004 (selected provisions on assault and rape).
[23](2001) 14 NWLR (Pt 732) 221 (SC).
[24](2003) 6 NWLR (Pt 816) 230 (SC).

[25] *Posu v State* (2011) 2 NWLR (Pt 1234) 393 (SC).
[26] Violence Against Persons (Prohibition) Act 2015 (Nigeria) (VAPP Act).
[27] CEDAW Committee, General Recommendation No 35 on gender-based violence against women, updating General Recommendation No 19 (14 July 2017) UN Doc CEDAW/C/GC/35.

Implementation also depends on criminal procedure, policing and prosecutorial priorities. Even where offences exist, under-charging, plea bargaining without survivor consultation, and slow trials can neutralize legal intent.

5.3 Nigerian GBV Case Law: Sexual Violence, Consent, Proof and Sentencing

Nigerian appellate decisions reveal both progress and constraints. *Ogunbayo v State*[28] and *Posu v State*[29] are frequently cited for evidential evaluation in rape prosecutions and for rejecting mechanical corroboration requirements. *Okoh v Nigerian Army*[30] illustrates how appellate courts can affirm serious consequences for sexual violence even in specialized/military justice contexts and underscores that prior sexual history cannot supply blanket consent to later acts. The decision also reflects a broader move—though uneven—toward recognizing autonomy and consent as ongoing, not presumed.

Isa v Kano State[31] provides a further contemporary reference point, citing *Posu's case* and emphasizing proper reasoning on evidence in sexual offence adjudication.

Sentencing remains a contested terrain. Scholarship argues that courts sometimes impose sentences that appear low relative to statutory maxima and the harms of sexual violence. Empirical critique in Nigerian legal scholarship highlights perceived 'under-punishment' and inconsistency[32]. Without national sentencing guidelines, sentencing outcomes depend heavily on local judicial culture and the availability of non-custodial options for lesser offences. For serious GBV, the normative question is whether sentencing consistently reflects denunciation, deterrence and survivor harm.

Domestic abuse also surfaces in civil and family litigation as 'cruelty' and grounds for relief. Court of Appeal decisions such as *Ugbotor v Ugbotor*[33] and *Adebayo v Adebayo*[34] illustrate judicial willingness to treat violence as legally significant in marital disputes.

Yet civil recognition does not automatically create criminal accountability. Survivors may pursue divorce or separation as a safety strategy where criminal justice is perceived as ineffective. This echoes socio-legal findings that survivors often use legal pluralism strategically—moving between customary resolution, police reporting, and civil claims depending on risk and resource constraints.

5.4 Nigeria: Statistical Evidence and the 'Implementation Gap'

Data constraints are central. Nigeria lacks routinely published national datasets that link GBV reporting, charging and conviction outcomes across the federation. Nevertheless, prevalence surveys provide critical context. The Nigeria DHS 2018 reports substantial levels of spousal violence and wide state-level variation.[35]

The implication is that criminal justice outputs (arrests, charges, convictions) represent only a small visible portion of a larger prevalence baseline. Under-reporting is driven by stigma,

[28](2007) 8 NWLR (Pt 1035) 157 (SC).
[29] (2011) 2 NWLR (Pt. 1234) 393.
[30] *Okoh v Nigerian Army* (2013) 1 NWLR (Pt 1334) 16 (SC).
[31] (SC.35/2013) [2016] NGSC 61 (28 January 2016) (NigeriaLII).
[32] A.M. Tijah, 'Sentencing Rape Offenders in Nigeria' (2021) UNIZIK Journal of Public and Private Law (selected discussion on proportionality).
[33] 2006) LPELR-7612(CA) or (2006)
[34] *Adebayo v Adebayo* (2015) LPELR-25762(CA) (matrimonial cruelty; domestic violence allegations).
[35] DHS Program, 'Nigeria DHS 2018—Statistical Report (selected state-level variation on spousal violence).' https://www.dhsprogram.com/pubs/pdf/fr359/fr359.pdf retrieved on April 25, 2026.

economic dependence, fear of retaliation and distrust of police. These dynamics reduce deterrence and create impunity. They also complicate evaluation: increases in reported cases may reflect improved reporting rather than increased violence.

From a due diligence perspective, the implementation gap is itself a rights issue. Where states fail to provide accessible reporting mechanisms, prompt investigation, and effective protection orders, formal legal rights become hollow.

6. United Kingdom: Statutory Architecture, Case Law and Institutional Design

6.1 From 'Private Trouble' to Public Wrong: Evolution of GBV Law

The UK's GBV legal development involves both statutory reform and appellate evolution. The abolition of the marital rape exemption in *R v R*[36] is a watershed, recognizing that marriage does not entail irrevocable consent and aligning criminal law with equality and autonomy.

The Sexual Offences Act 2003 further modernized the law, embedding a consent framework focused on freedom and capacity. Consent jurisprudence has been shaped by appellate interpretations, including the treatment of intoxication and reasonable belief (e.g. *R v Bree*).[37]

Domestic abuse reform increasingly emphasizes patterns. The coercive control offence in s 76 Serious Crime Act 2015 reflects this pattern-based understanding. Prosecutorial guidance elaborates evidential approaches—capturing patterns through texts, financial control evidence, social isolation indicators, and third-party testimony[38].

6.2 Domestic Abuse Act 2021: Consolidation and Oversight

The Domestic Abuse Act 2021 provides a statutory definition of domestic abuse including physical, sexual, emotional, economic and controlling/coercive behaviour.[39] It also strengthens protective orders and creates oversight through the Domestic Abuse Commissioner. In comparative terms, this institutionalization of oversight is significant: it embeds accountability beyond individual prosecutions.

The UK also uses civil and family-law mechanisms extensively. Protective orders, family court fact-finding, and child arrangements are all sites where domestic abuse is legally constructed and contested. Re H-N and Others is pivotal in clarifying how courts should analyse allegations, warning against a 'checklist' approach and emphasizing context and patterns.[40]

6.3 UK Case Law: Coercive Control, Self-Defence and Contextual Mitigation

Criminal jurisprudence has increasingly recognized the relevance of abuse histories to culpability. The 'battered woman' line of cases—Ahluwalia, Thornton (No 2) and Humphreys—illustrates the evolution of provocation/diminished responsibility analysis in contexts of sustained domestic abuse,[41]

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[36] *R v R* [1991] UKHL 12, [1992] 1 AC 599 (HL).

[37] *R v Bree* [2007] EWCA Crim 256.

[38] Crown Prosecution Service, 'Controlling or Coercive Behaviour in an Intimate or Family Relationship' https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.cps.gov.uk/prosecution-guidance/controlling-or-coercive-behaviour-intimate-or-family-relationship&ved=2ahUKEwjPnMDioYmUAxXCS0EAHSMwBhcQFnoECBgQAQ&usg=AOvVaw00jt0CUJdgJB7FP1V8tnND retrieved April 25, 2026.

[39] Legislation.gov.uk, 'Domestic Abuse Act, 2021.' https://www.legislation.gov.uk/ukpga/2021/17/section/1 retrieved on April 25, 2026.

[40] *R v Humphreys* [1995] 4 All ER 1008 (CA).

[41] *R v Ahluwalia* [1992] 4 All ER 889 (CA).

R v Challen is a modern landmark: the Court of Appeal recognized coercive control evidence as relevant to diminished responsibility and re-evaluated how prolonged abuse can shape psychological state and agency.[42] Such cases demonstrate a judicial willingness to incorporate feminist insights about entrapment and fear into doctrines historically shaped by male patterns of violence.

Sentencing also matters. Cases like *R v Kirk* illustrate appellate scrutiny of seriousness in domestic assaults.[43] In homicide contexts, the interaction of abuse with partial defences (loss of control) has been litigated in cases such as Clinton, highlighting the complexity of mixing relationship conflict, jealousy and abuse in legal categories.[44]

6.4 UK Data and Institutional Performance

The UK's data infrastructure enables monitoring. ONS estimates that 2.1 million people experienced domestic abuse in the year ending March 2023 (prevalence 4.4%). Partner abuse estimates show gendered distribution (4.0% women; 2.1% men) and enable intersectional analysis by age and other variables[45].

ONS analysis of domestic abuse and the criminal justice system reports trends in CPS prosecutions and outcomes, illustrating attrition and system pressure points. MoJ publications, including Women and the Criminal Justice System, provide gender-disaggregated criminal justice indicators relevant to understanding offender and victim pathways.[46]

However, data also reveals the 'justice gap': high prevalence coexists with relatively low levels of criminal justice resolution. Feminist and victimological scholarship argues that attrition is shaped by evidential cultures, credibility assessments, and victim-blaming narratives, particularly in sexual offences.[47]

7. Evidence, Data and the 'Justice Gap': Statistical Analysis

7.1 Conceptualizing Attrition

Attrition describes the progressive reduction in cases as they move through the system: from incident to report, report to charge, charge to prosecution, and prosecution to conviction.[48] Attrition can be driven by victim withdrawal, evidential insufficiency, policing failures, prosecutorial prioritization, delays, or trial dynamics. A comparative GBV analysis must treat attrition as a legal-institutional phenomenon, not merely individual 'choice'.

Quantitatively, the UK provides higher-resolution indicators. In Nigeria, prevalence surveys provide baseline denominators but system outputs are less consistently recorded nationally. Therefore, the analysis uses UK official statistics as the main quantitative case study while using Nigerian prevalence and selective institutional reports to infer key bottlenecks

[42] *R v Challen* [2019] EWCA Crim 916.

[43] *R v Kirk* [2008] EWCA Crim 434.
[44] *R v Clinton* [2012] EWCA Crim 2 (loss of control; context of relationship abuse).

[45] Office for National Statistics, 'Partner abuse in detail, England and Wales: year ending March 2023' (24 November 2023).
[46] Ministry of Justice, 'Statistics on Women and the Criminal Justice System 2023' (30 January 2025).
[47] Jennifer Temkin and Barbara Krahé, Sexual Assault and the Justice Gap (Hart 2008).
[48] J Chopin, 'Attrition in intimate partner violence cases through the criminal justice system: a scoping review of patterns and predictors.' https://www.tandfonline.com/doi/full/10.1080/01924036.2025.2495944 retrieved on April 25, 2026.

7.2 UK: Prevalence-to-Justice Gap

ONS prevalence estimates indicate the scale of domestic abuse annually.[49] Yet only a minority of victims report to police; third-sector summaries using ONS suggest low reporting rates among women experiencing partner abuse.[50] ONS criminal justice analysis reports CPS prosecutions trends, including decreases in some periods, illustrating how system capacity and policy priorities influence outputs.

The UK literature identifies several drivers of attrition:

(i) Difficulties evidencing coercive control and sexual offences;
(ii) Digital evidence overload;
(iii) Delays and disclosure controversies; and
(iv) The 'credibility premium' demanded of complainants. Scholars argue that reforms must improve evidence-led investigation and reduce re-traumatization.

7.3 Nigeria: Prevalence, Under-Reporting and Data Fragmentation

Nigeria DHS 2018 indicates substantial spousal violence prevalence and sharp state-level variation.[51] Such variation implies that local norms, enforcement capacity and service availability shape both violence and reporting. Data fragmentation also complicates policy: without integrated case tracking, states cannot reliably identify where cases fail—police station, prosecution decision, or court delay.

From a policy standpoint, building a national GBV data architecture is itself a legal reform. It enables accountability for due diligence duties and allows evaluation of VAPP domestication effects.

8. Comparative Evaluation: Convergence, Divergence and Explanatory Factors

Both jurisdictions converge on core ideas: GBV is wrongful; victims need protection; and criminal justice must respond. Yet they diverge in

(i) legal coverage uniformity,
(ii) Institutional oversight,
(iii) Doctrinal sophistication in recognizing patterns (coercive control), and
(iv) Data transparency.

Nigeria's major structural constraint is federalism combined with resource scarcity. Even where VAPP-style law exists, enforcement may be weak without trained units, shelters, and forensic capacity. The UK's constraint is different: legal coverage is stronger, but institutional cultures and evidential processes still generate attrition, particularly in sexual violence.

[49] Office for National Statistics, 'Domestic abuse prevalence and trends, England and Wales: year ending March 2023' https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/domesticabuseprevalenceandtrendsenglandandwales/yearendingmarch2025&ved=2ahUKEwiIsMWbpImUAxWSXUEAHbfwJywQFnoECB4QAQ&usg=AOvVaw3Yq56kqgSmz2uERx1p864e retrieved on April 25, 2026.
[50] Women's Aid, 'How common is domestic abuse?' (Using CSEW/ONS data; accessed February 2026).
[51] National Population Commission (Nigeria) and ICF, 'Nigeria Demographic and Health Survey 2018.' https://www.sciepub.com/reference/336344 retrieved on April 25, 2026.

Feminist theory helps explain why reforms sometimes fail. If institutions treat GBV as isolated incidents rather than gendered patterns of domination, they may discount evidence that does not fit 'real victim' stereotypes. Human rights due diligence frames this as a state failure: where protection orders are ineffective or investigations are perfunctory, the state tolerates violence.

10. Conclusion and Recommendations

The foregoing research shows that legal responses to GBV require coherence across law, institutions and data. Nigeria's VAPP Act offers a strong statutory foundation but must be paired with harmonized domestication, capacity building and transparent monitoring to satisfy due diligence expectations under CEDAW. The UK's consolidated statutory architecture and richer data improve accountability but does not eliminate the justice gap; attrition and contested evidential cultures remain central challenges.

Across both jurisdictions, feminist legal theory and human rights law converge on a core point: GBV is not a private misfortune but a systemic inequality requiring a responsive state. Reform should be evaluated not only by the existence of offences but by whether survivors can access protection, whether investigations are effective, whether prosecutions are fair, and whether outcomes are consistently proportionate.

Contained below are helpful recommendations for Nigeria UK alike

9. Reform Agenda: Doctrinal, Institutional and Policy Recommendations

9.1 Nigeria

1. Harmonization of legal coverage throughout ingthe country to accelerate domestication and implementation of VAPP-style laws across all states, ensuring consistent definitions, protection orders and remedies.
2. Building survivor-centred justice. This can be achieved through developing specialized GBV units with training on trauma-informed interviewing and evidence-led investigation.
3. Strengthening forensic and medical pathways. It would help greatly to standardize sexual assault referral pathways, chain-of-custody procedures, and medico-legal documentation.
4. Sentencing rationales: develop guideline-like practice directions for serious GBV offences to improve proportionality and consistency; draw on appellate principles in *Posu*, *Ogunbayo* and *Okoh.* cases
5. Data infrastructure. There is the need to establish a national GBV case tracking system linking police reports, prosecution decisions, court outcomes and protection orders to build a database.

9.2 United Kingdom

1. Improvement of evidence-led approaches in domestic abuse and sexual offences. This can be achieved by expanding specialist training and consistent application of CPS guidance on coercive control.
2. Reduction of attrition drivers. It would be helpful to invest in digital forensics capacity to reduce delays; ensure proportionate disclosure practices.
3. Strengthening family-criminal coordination. It would help if there is the application of the pattern/context approach emphasized in *Re H-N* across relevant fact-finding and protective proceedings.[52]

[52] Re H-N and Others (children) (domestic abuse: finding of fact hearings) [2021] EWCA Civ 448.

4. Expansion of survivor support and prevention. This is achievable through aligning service funding with prevalence, focusing on high-risk periods and intersectional vulnerabilities.