

FACING FRAGILITY: THE RESISTANCE OF WOMEN HUMAN RIGHTS DEFENDERS IN GENDER-BASED VIOLENCE ADVOCACY IN BALI

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ABSTRACT

Women human rights defenders (WHRDs) often find themselves in vulnerable situations, particularly due to their physicality, sexuality, and gender identity. In patriarchal settings like Bali, where gender inequality remains deeply rooted in cultural norms, such vulnerabilities are further exacerbated. These dynamics significantly affect the broader practice of human rights advocacy and illustrate the inherent risks involved—especially for women defenders working on cases of gender-based violence (GBV). This article explores how resistance emerges among WHRDs in the city of Denpasar, Bali, particularly in the context of advocating for GBV survivors. This resistance is often shaped by the repeated exposure to physical, mental, and sexual vulnerability during the advocacy process. The study also examines how intersecting discourses and patriarchal structures contribute to the formation of this resistance, as well as the resilience that follows. Using qualitative methods, including in-depth interviews and participant observation, this research identifies key forms of resistance practiced by WHRDs handling GBV cases. It finds that such resistance often leads to resilient actions that may positively influence the direction of GBV case handling in the region.

Keywords: *human right defenders, advocacy, women, fragility, Bali*

INTRODUCTION

Gender-based violence (GBV) refers to violence that stems from unequal power relations between genders, which are socially and culturally constructed. These imbalances contribute to systemic discrimination and the marginalization of certain gender identities, particularly women and gender minorities (Munasaroh, 2022). Data from Statistics Indonesia (Badan Pusat Statistik), as published in Official Statistical Report No. 37/05/Th.XXVII (May 6, 2024), indicate a notable decline in Indonesia's Gender Inequality Index (GII) over the period from 2018 to 2023. By 2023, the GII had reached 0.447, reflecting a 0.012-point reduction from the previous year, signaling gradual progress in

gender equity at the national level (BPS, 2024). While the decreasing trend in the Gender Inequality Index (GII) suggests progress toward gender equality and enhanced protection for subordinated groups, especially women, the reality on the ground reflects a contradictory pattern, as reported cases of gender-based violence (GBV) in Indonesia have continued to rise.

An increase in gender-based violence (GBV) cases in Indonesia was reported in the 2024 Annual Report (*Catatan Tahunan* or CATAHU) released by the National Commission on Violence Against Women (Komnas Perempuan) on March 8, 2024. The report states that Komnas Perempuan received 4,372 reports of GBV in 2023, marking a slight increase of three cases compared to 2022, which recorded 4,371 cases. According to CATAHU, the forms of GBV most commonly reported by women included psychological violence (41.55%), physical violence (24.71%), sexual violence (24.69%), and economic violence (9.05%). In addition to the reports submitted directly to Komnas Perempuan, GBV data were also collected from service providers offering support to women survivors of violence, managed either by the state or community-based initiatives. These service providers recorded 6,305 GBV cases in 2023, which is more than twice the number of cases officially received by Komnas Perempuan (komnasperempuan.go.id, 2024).

The discrepancy between the number of GBV cases reported to Komnas Perempuan and those recorded by service providers highlights the critical role of community-based support institutions for GBV survivors. Service providers—particularly advocacy-based institutions—play a significant role in assisting survivors of gender-based violence. One such form of advocacy service is Legal Aid Institutes (Lembaga Bantuan Hukum or LBH), which collaborate with law enforcement agencies and psychological services to address GBV cases experienced by survivors. These legal aid organizations, which specialize in supporting GBV victims, are now established in various regions across Indonesia and are actively engaged in receiving and responding to community reports of GBV.

Legal Aid Institutes (LBHs) are also present in Bali, particularly in Denpasar, to address cases of gender-based violence (GBV). These LBHs provide advocacy services for individuals who have experienced GBV and operate in collaboration with Regional Technical Implementation Units (*Unit Pelaksana Tugas Daerah* or UPTDs), which are government-established entities at both provincial and district levels. LBHs also work in synergy with professionals from legal and psychological backgrounds to offer comprehensive support in GBV cases. Within these institutions, human rights defenders

are often directly exposed to GBV cases. In the course of providing advocacy and support for GBV survivors, these defenders frequently find themselves in vulnerable situations—both psychologically and physically—particularly when the alleged perpetrators react negatively to their intervention. These individuals are recognized as human rights defenders due to their sustained advocacy efforts on behalf of GBV survivors, which constitutes a form of human rights protection.

Vulnerable situations in the handling of GBV cases are particularly experienced by women human rights defenders (WHRDs). Savitri and Sitanggang (2021) note that WHRDs are frequently subjected to verbal threats, psychological and physical attacks, and other serious forms of violence. Their position as women makes them even more vulnerable than their male counterparts. This heightened vulnerability stems from their embodiment, sexuality, and gender identity, which are often targeted. Attacks on the body, sexuality, and personal identity of WHRDs reflect an exploitation of gender-biased stereotypes, further exacerbating the risks they face in their advocacy work (Savitri & Sitanggang, 2021). Exploitation and stereotypes against women are more prevalent in societies that still adhere to patriarchal cultures.

Bali is one of the regions with a deeply entrenched patriarchal culture. This patriarchal culture, which contributes to gender inequality, impacts the overall practice of human rights advocacy and creates an environment where advocacy efforts often carry risks, even for women human rights defenders (WHRDs). As a result, WHRDs frequently find themselves in vulnerable situations—physically, mentally, and sexually—while handling gender-based violence (GBV) cases. Within the context of Bali, the intersectional discourse between women and local traditions plays a significant role in shaping the vulnerable situations faced by WHRDs working within Legal Aid Institutes (LBHs) and government institutions. These vulnerabilities contribute to the emergence of resistance within women human rights defenders dealing with GBV cases, particularly in Denpasar. This article will explore how resistance manifests among WHRDs working on GBV cases in Denpasar. It is hypothesized that such resistance arises due to the frequent exposure of WHRDs to physical, mental, and sexual vulnerability during the advocacy process. Additionally, the article will examine how intersectional discourse and patriarchal culture shape this resistance and the resilience that follows.

METHODS

This study employs a qualitative research approach. A qualitative approach is a

research method that emphasizes the researcher's ability to interpret and understand the respondents' experiences in order to gain a holistic understanding of the social realities encountered by the respondents (Mohajan, 2018, p.23-24). Common data collection methods used in qualitative research include questionnaires, in-depth interviews, literature reviews, and others. These methods are employed to assist researchers in seeking explanations for social phenomena or programs occurring within a community, with a focus on contextual understanding (Polkinghorne, 2005, p.138).

Bali, with a focus on the city of Denpasar, was chosen as the research locus. This is because Denpasar has several active advocacy service institutions involved in handling cases, and consequently, it has a larger number of human rights defenders (HRDs) who are more accessible. The research was conducted by selecting informants, including advocates and paralegals, from the following service providers: (1) LBH APIK Bali, (2) LBH Bali Women Crisis Center, (3) LBH Bali YLBHI, (4) Hopehelps Udayana University, and (5) UPTD PPA Denpasar City. The informants for this study were women human rights defenders from these LBHs and related government institutions who had previously handled GBV cases in Denpasar. Following this, the informants were interviewed in-depth regarding the vulnerable situations they faced and the resistance strategies they employed to address those vulnerabilities.

In addition to in-depth interviews, the study also employed an observational method for data collection. The use of observation as a data collection technique is often instrumental in investigating the non-verbal behaviors of informants during the research process. According to Sugiyono (2018), observation is a data collection technique that possesses distinctive characteristics when compared to other research methods. Observations were not limited to individuals, but also encompassed other objects and elements within the environment during the course of the study (Sugiyono, 2018). In this study, the observational technique will be employed to collect non-verbal data that may help address the research questions.

The data obtained through in-depth interviews and observation will serve as primary data. This primary data will be complemented by secondary data, which will be gathered through literature review and document study methods. The sources used for the literature review will include articles from journals, books, and reputable websites. In the document study process, relevant documents, whether written, visual, artistic works, or electronic, will be selected. Finally, after the data is collected, a qualitative data analysis process will be conducted.

RESULTS AND DISCUSSION

Gender-Based Violence Cases in Denpasar

Gender-based violence (GBV) cases in Denpasar are closely linked to the social and cultural context of Balinese society, which largely still adheres to patriarchal values. Patriarchy itself is rooted in the dominance of men across various dimensions, ranging from intimate relationships to the acquisition of political and economic power. The existence of patriarchal culture, whether in Denpasar or elsewhere, tends to be misogynistic and oppressive toward women (Wright, 2023). This misogynistic and oppressive nature serves as the root cause of gender-based violence.

Gender-based violence (GBV) is a form of violence that occurs due to the imbalance of power relations between genders. This often manifests when women are in subordinate positions or are placed below men in social hierarchy (Munasaroh, 2022). The position of women being placed beneath men results in various forms of suffering for women themselves. This suffering manifests as physical, psychological, and sexual harm, including threats, coercion, and arbitrary denial of rights in both public and private spheres. The severe consequences of GBV have drawn global attention, emphasizing the need for serious action. This is particularly important because GBV is rooted in gender inequality, which is one of the issues to be addressed in the Sustainable Development Goals (SDGs).

The SDGs (Sustainable Development Goals) are a set of development objectives formulated at the United Nations General Assembly in 2015. The assembly was attended by 193 heads of state and took place in Rio de Janeiro, Brazil. The SDGs consist of 17 goals and 169 integrated targets, designed to balance the four pillars of sustainable development: the economic pillar, the social pillar, the environmental pillar, and the governance pillar (Alisjahbana & Murniningtyas, 2018). The social pillar addresses, among other things, gender equality and the empowerment of women, which includes liberating women from various forms of oppression, violence, and injustice across different sectors.

Women's vulnerability to violence is also evident in Indonesia. According to the Annual Report (CATAHU) by the National Commission on Violence Against Women (Komnas Perempuan), there were 289,111 reported cases of violence against women in 2023. Of these, 3,303 cases were identified as gender-based violence (GBV). The reported GBV cases were predominantly characterized by violence against women in the personal/domestic sphere, with 289,741 cases (98.5%), followed by 4,182 cases (1.4%) in the public sphere, and 188 cases (0.1%) in the state sphere (Komnas Perempuan RI,

2024). The number of cases reflects the vulnerable situation of women facing violence at the national level. The majority of the reported violence occurs in the personal and domestic spheres. This underscores the importance of a more personalized approach to addressing GBV cases, particularly those affecting women. This personalized approach involves understanding the context of GBV in different regions of Indonesia.

Bali, as one of the regions in Indonesia, is also not exempt from instances of gender-based violence (GBV). According to data collected from LBH Bali, the following is a breakdown of the GBV cases reported in various regencies/cities across Bali based on complaints received by LBH Bali in 2023-2024:

Regencies/city	2023	2024
Denpasar	17	17
Badung	2	2
Bangli	1	-
Buleleng	-	3
Gianyar	-	3
Jembrana	-	1
Karangasem	1	-
Klungkung	-	-
Tabanan	1	1
Total	22	27

Based on the data compiled by LBH Bali, there has been a notable increase in the number of gender-based violence (GBV) complaints received by the organization from 2023 to 2024. In particular, Denpasar City consistently reports the highest number of GBV complaints compared to other regencies in Bali. This trend highlights the urgency of addressing GBV in urban areas, where both the prevalence of cases and the complexity of handling them are significant. Given this, the focus of this study will be on the GBV situation in Denpasar, with particular emphasis on the resistance strategies employed by female human rights defenders who work on GBV cases. These defenders often face unique challenges and vulnerabilities due to the intersection of their gender and their advocacy work. Thus, the study aims to explore how these women navigate their roles in the face of physical, psychological, and sometimes sexual threats, and how their resilience contributes to the broader efforts of tackling GBV in the region.

Denpasar, as the location for this study, hosts several LBH (legal aid organizations) and government institutions dedicated to advocating for gender-based violence (GBV) cases. These organizations include (1) Hopehelps UNUD, (2) LBH APIK Bali, (3) LBH Bali Women Crisis Center, (4) YLBHI-LBH Bali, and (5) UPTD PPA Denpasar City. Each of these institutions plays a pivotal role in providing legal and psychological support to victims of GBV and contributes to the broader effort to combat such violence across Bali. The female human rights defenders (HRDs) working within these LBHs and government bodies serve as key informants for this research. These women have actively handled GBV cases in Denpasar and have thus experienced firsthand the vulnerabilities associated with such advocacy work. The vulnerable situations they face are not limited to their work in Denpasar but also extend to other regencies within Bali. This exposure to risk, both physical and psychological, is a central theme of this study, which aims to explore the strategies of resistance employed by female HRDs in the face of the threats they encounter while advocating for GBV victims.

Vulnerable Situations in the Handling of Gender-Based Violence (GBV): Fragility

Women human rights defenders (HRDs) often find themselves in vulnerable situations. According to Savitri and Sitanggang (2021), female HRDs are frequently subjected to verbal threats, psychological and physical attacks, and serious forms of violence. Moreover, their position as women makes them more vulnerable than their male counterparts. This increased vulnerability arises from the intersection of their gender with their roles as defenders of human rights, which exposes them to heightened risks to their physical integrity, sexuality, and personal identity as women. Attacks on the bodies, sexuality, and personal identities of female HRDs represent a form of exploitation rooted in gender-biased stereotypes, which often exacerbate the challenges they face in their advocacy work (Savitri & Sitanggang, 2021). In relation to this study, the work of Savitri & Sitanggang (2021) provides a clear depiction of the vulnerable situations faced by individuals working in advocacy services, particularly those focused on human rights defense. This is especially relevant for women human rights defenders, who are often engaged in the challenging and dangerous task of addressing gender-based violence (GBV), a form of violence that is widely recognized as a violation of human rights. Their experiences highlight the complex intersection of gender, vulnerability, and human rights advocacy, where the risks of physical, psychological, and sexual violence are exacerbated by the very nature of their work.

The depiction of vulnerable situations faced by female human rights defenders,

particularly in relation to crimes against humanity, is also outlined in the Amnesty International report titled *The Entire System Against Us: Criminalization of Women Justice Operators and Human Rights Defenders in Guatemala* (2024). Amnesty International, a movement with 10 million members, aims to promote human rights and advocate for change through campaigns that emphasize the dignity of every individual. In its case study on Guatemala, Amnesty International highlights the legal actions taken to intimidate and criminalize those involved in human rights defense, particularly when addressing corruption or cases involving public officials who are immune from legal accountability. These findings underline the significant risks faced by human rights defenders, especially women, who challenge systems of impunity and corruption.

Intimidation and criminalization in this case also extend to female advocates who serve as legal counsel and human rights defenders in Guatemala (Amnesty International, 2024). Intimidation and criminalization represent vulnerable situations that female human rights defenders must face. These women, when engaging in advocacy actions, often lack adequate protection from misogynistic attacks that can occur in public spaces such as courtrooms or in digital spaces like social media. This vulnerability is closely tied to their gender as women and their roles as mothers or protectors of their families. The vulnerability resulting from intimidation and criminalization has had a series of psychosocial impacts that affect the lives of female human rights defenders in various aspects (Amnesty International, 2024).

The description provided in the Amnesty International report offers a broader understanding of the vulnerable situations that female human rights defenders may face. These vulnerabilities are primarily related to their gender roles and the misogynistic behaviors that result in power imbalances between genders. Such challenges cannot be separated from the deeply entrenched patriarchal culture that still influences various aspects of society. The patriarchal culture, which underpins gender inequality, impacts the execution of human rights defense in any form, illustrating that advocacy actions often come with significant risks, particularly for female human rights defenders themselves.

The advocacy actions, which are often risky even for female human rights defenders themselves, are also highlighted in a joint statement by IUCN (International Union for Conservation of Nature), WWF (World Wide Fund for Nature), and the Ministry of Foreign Affairs of the Netherlands titled *Women Environmental Human Rights Defenders: Facing Gender-Based Violence in Defense of Land, Natural Resources and Human Rights* (2021). Vulnerable situations are frequently encountered by human rights

defenders from marginalized groups, such as women, indigenous communities, and others. These vulnerabilities include discrimination and violence that are socially normalized. Additionally, gender, race, ethnicity, social class, sexual orientation, and age identity all influence the social structures and cultural norms that are permissive of violence against these human rights defenders (IUCN, 2021). The IUCN statement provides insight for this research on how the intersectional identities inherent in human rights defenders can be a factor in the normalization of violence against them.

The normalization of violence against female human rights defenders is closely related to the vulnerable situations they face. In connection with this research, the researcher conducted interviews with nine key informants from LBH and government institutions in Denpasar regarding the vulnerable situations they experience. These nine informants include four advocates, three paralegals, and two Legal Aid Volunteers (PBH-Pengabdian Bantuan Hukum). Advocates are individuals who have undergone a series of training and certification to become legal professionals, paralegals are those with a legal educational background but have not yet completed certification to become advocates, while Legal Aid Volunteers (PBH) may come from diverse academic backgrounds and are involved in advocacy processes including accompaniment, campaigns, and research.

Interviews with key informants in this study revealed the vulnerable situations faced by female human rights defenders in Denpasar. The vulnerable situations encountered by these defenders are often influenced by the sensitive nature of the cases they handle. It is common for female human rights defenders to face these vulnerable circumstances. They frequently experience oppression from various actors, both state and non-state. The vulnerable situations faced by human rights defenders can lead them to become victims of severe human rights violations themselves, such as enforced disappearances, arbitrary arrest and detention, torture, and extrajudicial killings. These attacks, which form part of the vulnerable situations, can occur in physical, psychological, verbal, sexual, and even digital dimensions (Cakra Wikara Indonesia, 2022). One group of human rights defenders that faces higher vulnerability compared to others includes women and individuals with minority sexual orientations (Cakra Wikara Indonesia, 2022).

In the context of this research, the vulnerable situations experienced by female human rights defenders among the interviewees are diverse. These vulnerable situations are related to the gender of the interviewees, who are women, as well as their identity as Balinese women. This is in line with the findings from Cahyani (2007) which asserts that female human rights defenders involved in advocacy activities often face vulnerable

situations related to their identity as women, which can intersect with customary practices. In the specific context of Bali, particularly Denpasar, the vulnerable situations encountered by the interviewees in this research are closely linked to patriarchal culture and the power imbalances between victims and perpetrators, particularly in cases of gender-based violence (GBV) that the interviewees handle. For instance, when the perpetrator belongs to a community that is traditionally and culturally respected, a significant power imbalance often arises. Interviewees handling cases with such significant power disparities between the victim and the perpetrator tend to face a series of intimidations, terror, and even threats from the perpetrator's legal representatives or from the perpetrators themselves. Moreover, the interviewees are also vulnerable to having their credibility questioned and being offered bribes. These challenges represent vulnerable situations resulting from external factors (perpetrators, their legal representatives, the perpetrator's family, other advocates, and the media). In addition to the vulnerabilities stemming from external pressures, there are also internal vulnerabilities that arise from within the interviewees themselves.

Vulnerable situations arising from internal factors within the interviewees themselves, for instance, include the potential for second-hand trauma experienced by individuals providing advocacy services. This is particularly evident when advocacy service providers are repeatedly confronted with the need to listen to victims' stories in detail, exposure to personal experiences of sexual violence, overwhelming casework burdens, and the lack of cooperation from law enforcement in handling and resolving cases. Such internal vulnerabilities can negatively impact the overall handling of cases. The vulnerable situations faced by female human rights defenders dealing with gender-based violence (GBV) in Denpasar are also deeply intertwined with their identities as women. Some interviewees have experienced body shaming, threats, intimidation, and a lack of support due to their involvement in defending female victims. These vulnerabilities related to their identity as women have implications for the case handling process, where female human rights defenders are often dismissed and undermined, even by male human rights defenders.

Resistance of Female Human Rights Defenders in Denpasar: Fostering Resilience

The vulnerable situations faced by female human rights defenders in Denpasar have implications for the resistance that inevitably emerges within them. One form of resistance demonstrated by the informants in this study is the courage to confront intimidatory language. Such language can come from perpetrators, their lawyers, or even

law enforcement agencies still handling cases of sexual violence without a victim-centered perspective. This often leads to victim-blaming. Another form of resistance observed among the informants is the seeking of legal assistance. Despite a prevalent mistrust in the legal system, as expressed by the informants, several of them still sought legal protection when confronted with threatening situations while handling gender-based violence cases.

One of the informants from LBH APIK Bali, for example, was once followed by an unknown car while on the road. At the time, she was handling a gender-based violence (GBV) case that involved a significant power imbalance between the perpetrator and the victim. Her form of resistance was to quickly divert to the nearest police post and report the stalking incident. As a result, she received protection from the police. This case illustrates how resistance efforts by female human rights defenders can ultimately lead to the development of resilience. Resilience, in this context, can be cultivated both individually and with the support of others.

This study identified several forms of resilience exhibited by female human rights defenders in Denpasar. The first form of resilience observed is psychological strengthening. This psychological reinforcement can be derived from within oneself, peer support, and psychological service providers. Psychological strengthening can be achieved through various methods, such as: (1) sharing or venting emotions; (2) taking rest; (3) temporarily stepping back from advocacy activities; (4) avoiding social media; and (5) practicing positive self-affirmation. This resilience is employed to minimize the negative impacts caused by continuous advocacy efforts undertaken by female human rights defenders. Advocacy work, after all, is not always safe and can sometimes be fraught with risks. This is particularly true when handling cases that involve a significant power imbalance between the perpetrator and the victim. Female human rights defenders engaged in case support, as part of the advocacy process, are also at risk of receiving unpleasant treatment that threatens their well-being.

Another form of resilience identified in this study is the participation in training and capacity-building efforts. These training programs aim to enhance the capabilities of advocacy service providers when handling cases that may place them in vulnerable situations. Capacity-building training for advocacy service providers includes both psychological and legal aspects. One of the participants in this study, for example, mentioned having attended training on feminist legal theory. Feminist legal theory is a branch of feminist thought that emphasizes the lived experiences of women as a

foundational basis for advocating women's rights within the legal framework. This theory focuses on addressing women's specific needs, prompting a critical reflection on whether the legal instruments used to handle cases are truly promoting gender equality (Triantonio, 2023).

The implications of gender equality in the legal instruments promoted by feminist legal theory are expected to provide a gender-sensitive perspective for advocacy service providers when handling cases. This training appears to focus on the application of feminist perspectives towards victims by advocacy service providers. In relation to the development of resistance in advocacy service providers, this training instills empowerment values that enable providers to better handle gender-based violence (GBV) cases. For example, by raising awareness that the legal instruments in GBV cases may not fully integrate a gender-equal perspective, advocacy service providers become more attuned to the risks they may face when supporting victims. This awareness leads to the implementation of a series of preventive actions to protect both themselves and the victims they assist.

A series of preventive actions to protect both the advocacy service provider and the victim they assist is crucial. This is especially important in the legal field, which is still predominantly male, making it highly masculine. The interviewees in this study also stated that the legal profession is still dominated by men, and as a result, training on handling cases with a gender equality perspective is absolutely necessary. They mentioned that such training helps build the resistance of advocates at LBH APIK when dealing with cases related to gender issues. One form of resilience that emerges is the awareness of the complexity of cases, enabling advocacy service providers to prepare themselves for the possibility of being in a vulnerable situation, particularly when dealing with cases where there is a significant power imbalance between the victim and the perpetrator.

The women human rights defenders in Denpasar who participated as informants in this study have demonstrated several forms of resistance. This resistance emerged as a response to a series of vulnerable situations. These vulnerable situations arose as a consequence of their involvement in handling gender-based violence (GBV) cases in Denpasar. The forms of resistance represent efforts of resistance and self-defense by advocacy service providers in Denpasar. These acts of resistance then transformed into resilience among the women human rights defenders, potentially influencing the process of handling GBV cases. For example, the study found that informants who exhibited resilience in the face of vulnerable situations were better able to direct the handling of

cases in a more efficient manner, aligning it with the needs of the victims.

CONCLUSION

The vulnerable situations faced by women human rights defenders in Denpasar in this study are linked to the deeply rooted patriarchal culture in Balinese society. These vulnerable situations include a series of intimidations and threats from the perpetrators, not only toward the victims but also towards the victims' legal representatives, who are human rights defenders. Women human rights defenders handling gender-based violence (GBV) cases are considered to be more vulnerable, especially when customary laws and cultural implications are involved. In the Balinese context, these customs and traditions tend to marginalize women human rights defenders, creating additional vulnerabilities. This triggers resistance within these women human rights defenders, and such resistance leads to resilience, which has the potential to positively influence the direction of case handling.

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