



**STRENGTHENING EU SUPPORT
TO GENDER EQUALITY
THROUGH EXTERNAL ACTION:
RECOMMENDATIONS FOR THE THIRD
EU GENDER ACTION PLAN**

February, 2020

**— KVINNA
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Photo caption: Members of Kvinna till Kvinna's partner organisations in North Macedonia together with Kvinna till Kvinna's Swedish goodwill ambassador Fanna Ndow Norrby.

February 2020

ACRONYMS

COM	Communication
CSOs	Civil Society Organisations
DG NEAR	Directorate General for Neighbourhood and Enlargement Negotiations
EC	European Commission
EEAS	European External Action Service
EU	European Union
EUD	European Union Delegation
GAP II	Gender Action Plan II
GM	Gender Marker
IPA II	Instrument for Pre-Accession
NDICI	Neighbourhood, Development and International Cooperation Instrument
MTR	Mid-term Review
OECD/DAC	Organisation for Economic Co-operation and Development / Development Assistance Committee
OPSYS	Operational Information Systems
SDGs	Sustainable Development Goals
SWD	Staff Working Document

Introduction

In 2015, the EU adopted the **Gender Action Plan II** (Gender Equality and Women's Empowerment: Transforming the Lives of Girls and Women through EU External Relations 2016-2020). The GAP II built on lessons learnt from and achievements of GAP I while expanding its scope of intervention and introducing some novelties. Firstly, it relied not just on the European Commission services but also the European External Action Service and the EU Member States for its implementation. Secondly, it covered activities not only in developing countries but also in the enlargement, neighbourhood, fragile, conflict-affected and post-conflict countries. Thirdly, it focused on shifting the way in which the EU works with gender equality within the institutions by introducing the "institutional culture shift" objectives. Finally, it set the ambitious target of having 85% of new actions scoring either OECD/DAC GM1 (gender as significant objective) or GM2 (gender as principal objective) by 2020.

The new GAP II aimed to bring about a **transformation in the way in which the EU supports gender equality in third countries**. It was built on the need to bridge institutional divides and bring various EU institutions and Member States together to work jointly towards common goals. The GAP II ensured a coherent policy approach, similar commitments and same targets in diverse partner countries including accession, developing, fragile or conflict-affected or post-conflict countries. Finally, it signaled that the "business as usual" approach to gender equality would no longer be accepted and that the EU would significantly shift and improve its working practices by introducing, among others, the consistent use of gender evidence to inform EU policy-making, programming and spending. This revised approach would allow EU institutions to meet the ambitious commitments and make a difference for women and girls in partner countries beyond rhetoric.

The **Kvinna till Kvinna Foundation** has been following the GAP II and its implementation since 2016. Its **partner organisations** in several regions reached out to EU Delegations to seek information on EU's engagement on gender equality in their country, offered their expertise and understanding of issues affecting local women and girls and preventing their full enjoyment of rights, contributed to its implementation as implementing partners through dedicated funding (both service contracts and grants). To collect facts and learnings about the implementation of GAP II, in 2018, the Kosova Women's Network carried out an evaluation of the implementation of GAP II in the Western Balkans, with support by Kvinna till Kvinna Foundation, and in 2019 the Kvinna till Kvinna Foundation commissioned an independent evaluation of the implementation of GAP II in Jordan, Iraq and Lebanon.

This paper aims to gather reflections and learnings on the GAP II and to put forward recommendations to feed into the upcoming consultations for the next EU Gender Action Plan for external relations. We strongly recommend **the EU to capitalise on the success stories of GAP II, reaffirm its commitments and fix some of its weaknesses** to be able to project its support into the next decade. The EU should live up to its ambition to be a principled, effective and reliable actor on gender equality in partner countries and a credible voice for women and girls on the global arena.

¹ [Mind the GAP - an Independent Evaluation of the Implementation of the GAP II in Western Balkan Countries](#)

Recommendations for DG for International Cooperation and Development, DG NEAR, EEAS and Member States

GAP III should:

Visibility, Transparency and Inclusivity

- 1) Be published as an **EU official communication** to signal the importance of the policy
- 2) Be accompanied by a **Visibility and Communication Strategy**, both inside and outside the EU
- 3) Be designed through a **transparent and inclusive process** including key stakeholders (EU institutions, EU Member States and civil society both in Europe and in partner countries)

Consultation and Involvement of Civil Society Organisations

- 4) Build a **meaningful partnership** with international and local civil society organisations, including specifically **women's and girls' rights organisations**, for the design, implementation, monitoring and evaluation of GAP III
- 5) Introduce a **stand-alone objective on involving women's rights and girls' rights organisations** in identifying priorities, validating gender analysis and contributing to GAP III as implementing partners
- 6) Establish a **GAP III reference group in partner countries** with representatives of women's and girls' rights organisations to be consulted bi-annually by the EU Delegations for GAP III planning and implementation
- 7) **Recognise the detrimental impact of shrinking civic space** on women's and girls' rights organisations and activists in partner countries and use GAP III to build and defend their operating space

Institutional Culture Shift and Thematic Priorities

- 8) Strengthen the Institutional Culture Change Objectives by establishing **more ambitious minimum standards for GAP III** and introduce a system of **rewards and sanctions** to encourage implementation
- 9) **Require gender analysis, gender budgeting and gender impact assessments** to be at the core of all EU programming, spending and policy-making for external action
- 10) Ensure **continuity of GAP II thematic priorities/objectives** into GAP III to build on the results already achieved and to avoid disruption due to lack of alignment between policy and programming cycles

Coordination and Cross-fertilisation with other Thematic and Geographic Policies

- 11) Ensure GAP III will continue to apply to **development, accession, neighbourhood, fragile, conflict and post-conflict countries**
- 12) Ensure **GAP III informs and is complemented by other EU thematic and geographic policies**, in particular the Accession and Neighbourhood Policy, the EU Strategic Approach to Women, Peace and Security, the EU Human Rights and Democracy Action Plan and the EU Engagement with Civil Society in External Relations
- 13) Include context relevant GAP objectives **in EU Partnership Priorities** with partner countries, in specific **Country Strategies** and in the **Single Support Frameworks**

Alignment of EU policy, programming and funding cycles

- 14) **Align EU policy, programming and funding cycles** to the extent possible to ensure GAP III informs programming and spending decisions over its implementation period

Human and Financial Resources

- 15) Set up and resource adequately a **Gender Facility at DG NEAR and EEAS** (similar to the one in DG for International Cooperation and Development) to provide support to staff, coordinate GAP III across the institutions and ensure coordination with other thematic and geographic policies led by DG NEAR and EEAS
- 16) Appoint **full-time Gender Experts** both in Brussels and in EU Delegations and provide them with adequate support, mandate and resources
- 17) Include **specific GAP III responsibilities in job descriptions** of all relevant staff including Directors, Heads of Units, Heads of Delegations, political and programming staff
- 18) **Earmark funding for the implementation of GAP III in the next generation** of EU external funding instruments 2021-2027, in particular in the NDICI and IPA III
- 19) Keep the target of **85% GM1** of all EU actions and introduce a target of **20% for GM2**

Monitoring and Accountability

- 20) Improve the **clarity and readability of the annual reports** and the possibility to extract useful and complete information and data on EU's support to gender equality in partner countries
- 21) Introduce **clear baselines, targets and indicators** at the right level of intervention in the monitoring framework to monitor both progress in implementation and results of EU actions
- 22) **Publish contributions of EU institutions, Delegations and Member States to annual reports** as a key transparency and accountability measure
- 23) Introduce a **simple online reporting tool** to reduce burden on reporting officers
- 24) Include **basic questions on the GAP III in OPSYS²** to allow for automatically generated data / information on programming to feed into the GAP III reports
- 25) Investigate whether the GM is used in a correct way and draw learnings
- 26) Track **how much of the EU funding for gender equality is channeled to:**
 - a. National Gender Equality Mechanisms
 - b. UN entities and other international organisations
 - c. international and local CSOs
 - d. women right's organisations specifically

² See specific recommendations developed by Kosova Women's Network on this topic.

Lessons learnt from GAP II

Visibility, transparency and inclusivity

The GAP II was adopted as a SWD and suffered from limited visibility and political clout. The nature of internal SWD, generally used to accompany EU official Communications (COM), provided the policy with limited political clout both inside and outside the EU, despite the endorsement by EU Member States in the Council Conclusions of 26 October 2015. Although the SWD included clear language on the mandatory nature of the policy, it was not perceived as such. The lack of a communication and visibility strategy for GAP II both within the EU and in partner countries (where the policy is only available in English) also contributed to its limited visibility vis-à-vis EU citizens and stakeholders in partner countries.

The awareness of GAP II and its specific commitments by EU Delegations and Member States embassies also varied considerably in partner countries, according to the two evaluations conducted by the Kvinna till Kvinna Foundation. Furthermore, CSOs in partner countries reported to have had limited awareness of EU commitments under the GAP II, even when they were implementing partners. Visibility and transparency of EU's engagement on gender equality through external action is key to ensure the success of the policy and uptake by responsible staff in EU institutions, EU Delegations and Member States. Transparency should also inform the process of designing the GAP III and communication around its timeline, stakeholders involved and timing for consultations with civil society.

Consultation with and involvement of civil society organisations

Consultation with and involvement of civil society organisations in partner countries has not been a clear priority for GAP II. Only one Action (4.3) called on the EU Delegations to consult with civil society organisations working on girls' and women's rights (as well as Gender Equality Mechanisms) to inform country-level programming. The findings of the two evaluations carried out by the Kvinna till Kvinna Foundation and partner organisations indicate that women right's organisations and other civil society organisations were generally neither consulted for nor informed about the choice of thematic objectives by the EU Delegation and only in two cases were contracted / consulted for the gender analysis.³

Furthermore, it is hard to quantify civil society's involvement in the implementation of GAP II as there is no available data on the funding allocated under the GAP II to actors, including civil society organisations. Kvinna till Kvinna Foundation's evaluations found that even where civil society organisations were receiving grants from the EU in partner countries on gender equality issues they were often not aware of their role as implementing partners of GAP II.⁴ The new GAP III should foresee much stronger partnership with civil society organisations and women's organisations specifically who with their proximity to women and girls in partner countries, understanding of their needs and ability to identify key priorities, are essential to the successful implementation of the policy.

³ In the Western Balkans, two partners of the Kvinna till Kvinna Foundation were awarded service contracts to carry out the gender analyses for the EU Delegation / Office and to support gender mainstreaming of the EU and national government's programmes and policies.

⁴ This was reported by Kvinna till Kvinna partners in Jordan in the course of the evaluation carried out in 2019

Women rights' organisations and Activists in GAP II – Defending and Enabling Civic Space

Women's rights organisations and activists are personally and professionally affected by multiple forms of shrinking space in a profoundly gendered way. Restrictive legislation on CSOs funding, heavy administrative procedures, public defamation and slander, travel bans, threats to women activists and their families on-line and off-line are among the most common tactics to silence and discourage activism on women's and girls' rights in many countries.⁵ **Objective 18 of GAP II was specifically introduced to defend and build the civic space for women's organisations, other CSOs and individual activists working for gender equality.** While this objective is key and should be maintained in the next GAP, the current formulation and proposed activities lack a clear reference to the importance of an active role of women's rights organisations and activists in this area, as opposed to mere recipients of EU support (be it political or financial).

EU Delegations should foresee **a direct and regular dialogue with the women's organisations in question to identify the challenges** they face and discuss priority actions by EU which could be supported under the GAP. In order to ensure that the EU delivers the right type of support to women's rights organisations and activists, the EU delegations should:

- Map out women's rights organisations and their expertise / areas of work
- Analyse specific obstacles (be it legislative, administrative, political, security) facing women's rights organisations and activists restricting their operating space
- Listen to the requests and needs of women's rights organisations and activists to ensure they can operate freely
- Ensure they directly contribute to the implementation of the GAP not just as implementing partners but also as key experts
- Simplify process of applying for EU grants and make more substantial use of sub-granting procedures to ensure small-size organisations can access EU funding

Institutional Culture Shift and Thematic Priorities

The introduction of the **Institutional Culture Shift objectives and related minimum standards**⁶ constituted one of the great novelties of the GAP II. The justification of an action marked GM 0, the consistent use of gender analysis and of sex disaggregated data to inform policy and programming, the timely use of gender expertise available and the selection of thematic objectives to report on were considered prerequisites for the EU's implementation of its gender equality priorities yet their uptake by EU institutions, Delegations and Member States has been sketchy. Actions marked GM 0 have not always been justified, the gender analysis at the correct level of intervention has often been elusive and it has not always contributed to the selection of objectives by the EUDs. However, while implementation of these objectives has been uneven, the reasoning behind their adoption remains valid and should be kept in GAP III to ensure the EU builds on the good effort that some Institutions / Delegations / Member States put into achieving them.

⁵ See Kvinna till Kvinna report [Suffocating the movement: shrinking space for women's rights](#) (2018)

⁶ In particular, the minimum standards mandated by 2016: the use of OECD/DAC Gender Marker 0 always be justified; the gender analysis for all priority sectors carried out; sex-disaggregated data used in project and programme cycle and programming; gender expertise is available and used in a timely manner in the programme cycle and programming; thematic objectives selected (by EU Institutions and Delegations) to be reported on.

Also, **GAP II thematic priorities⁷ are still relevant today.** However, both EU annual reports and the Kvinna till Kvinna Foundation evaluations show that the flexible system of selection of thematic objectives to report on is not widely understood and is not yielding the expected results. Not all Member States and EUDs select the objectives to report on, leading possibly to an underreporting of actions, and many are not linking the selection of objectives to the mandatory gender analysis. The Kvinna till Kvinna assessments found that, where gender analysis was not directly informing the choice of thematic objectives by EU Delegations, there was a discrepancy between the objectives selected and the priorities perceived by women rights' organisations in the partner country. Finally, the 2018 Annual Report of GAP II shows a very limited up-take of Objectives 8 (trafficking and exploitation) and 20 (women in decision-making on climate and environment)⁸ which is a cause of concern as it suggests that certain themes are not considered priorities anywhere.⁹

Coordination and Cross-fertilization with other EU Thematic and Geographic Policies

Another key novelty of GAP II consisted in the decision to **widen its geographic scope** to accession, neighbourhood, fragile, conflict and post-conflict countries in addition to development countries, thereby ensuring a coherent approach across EU partner countries. GAP II and other EU thematic and geographic policies such as the EU Neighbourhood Policy, the EU Accession/Enlargement negotiations policy and criteria, the Human Rights Country Strategies and the Strategic Approach to Women, Peace and Security are clearly intertwined but evidence suggests they are not consistently complementing each other.

The Western Balkans Strategy¹⁰ (with the annexed Six Flagship Initiatives) adopted in 2018, two years after the GAP II, fails to either refer or include GAP II commitments. On the contrary, the Partnership Priorities developed by the EU and Jordan include a specific reference to EU's support to gender equality through the GAP and this is reflected in the Single Support Framework for Jordan (2014-2020) which allocates 5% of funding through the Civil Society provision for targeted support to the implementation of the GAP II. As the GAP II did not have an allocated budget, limited or no references to its commitments in other country- and region-specific policies and bilateral agreements between the EU and partner countries may translate in the lack of funding for gender equality priorities. For this reason, there should be greater uptake of GAP II commitments in other EU thematic and geographic policies linked to specific funding allocations and in bilateral agreements such as the Partnership Priorities.

Alignment of Policy, Funding and Programming Cycles

EU policy, programming and funding cycles in partner countries are not aligned. This has a considerable impact on the implementation of a 5-year policy as there is at least a two-year interval between a decision on programming and the beginning of its implementation. This means that, as the GAP II draws to a close in 2020, programmes which may have been funded under it would have just started implementation. Results of programmes and projects developed and funded during GAP II will, therefore, only be observed after the official implementation period of GAP II has ended. This creates a visible gap between policy-making and programming / funding cycles which needs to be fixed.

⁷ B: ensuring women's and girl's physical and psychological integrity; C: promoting social and economic rights / empowerment of women and girls; D: strengthening women's and girls' voices and participation.

⁸ See the full list of objectives in Annex 1.

⁹ See figure 6, page 23, 2018 Annual Report on GAP II.

¹⁰ [A Credible Enlargement Perspective for an enhanced EU Engagement in the Western Balkans](#) (2018)

Human and Financial Resources

In-house human resources to support implementation of GAP III should be **commensurate to the level of EU's ambition**. While GAP II included ambitious objectives, the human resources dedicated to achieving them have been scarce. Full-time Gender Experts both in Brussels and EU Delegations are crucial to ensure adequate implementation of the policy and should be adequately empowered. Evaluations by the Kvinna till Kvinna Foundations found that they are often double-hatted, over-stretched and insufficiently supported by their hierarchy. Furthermore, the 2018 Annual Report of GAP II indicates that only 10% of Gender Focal Persons thought that their functions were reflected in their job descriptions. The successor of GAP II should ensure that job descriptions of staff at all levels including Director, Head of Unit and Head of Delegation level, be revised to include clear responsibilities to implement gender equality commitments.

GAP II prescribed a target of 85% of EU actions which consider either gender equality as a principal objective (GM1) or as a significant objective (GM2) to be achieved by 2020. This target focuses on the number of actions marked and not on the amount of funds committed. Although the Gender Marker is an important tool, it is insufficient to capture EU actual allocations and expenditures for gender equality in partner countries. **In fact, it is still impossible to determine how much is committed to gender mainstreaming and how much is committed to specific actions intended to contribute to gender equality in partner countries.** Also, both the EU Annual Reports and the Kvinna till Kvinna evaluations suggest that the GM has not always been used correctly, possibly leading to misrepresentation in the amount of actions marked GM1. Finally, the close to zero percentage of actions marked GM2 in 2018¹¹ show that, for an increase in actions having gender as a principal objective, there needs to be a specific target for actions marked GM2.

In addition, the MTR of the external funding instruments of the EU carried out in 2017 offered some insights on the extent to which EU external funding instruments mainstreamed gender equality but no indication of whether results for women and girls were achieved in partner countries and how they could be improved, as mandated by the GAP II. The MTR evaluation of the **Instrument for Pre-Accession** found that there was a “lack of comprehensive horizontal issues (Roma, gender, child rights, disability aspects, climate action, security issues) in policy papers and programming”.¹² The evaluators recommended that “the integration of horizontal themes should be increased (e.g. for gender: gender analyses, gender disaggregated data for all sectors, gender responsive budgeting, alignment of IPA II with the GAP II)”.¹³

Monitoring and Accountability

Reporting and monitoring of GAP II has been **challenging** according to both EU and Member States staff. Four clusters of issues emerged from the EU annual reports and from the Kvinna till Kvinna Foundation's evaluations. First, the absence of agreed baselines and clear targets for each indicator made it hard to report on progress towards achieving each objective. Second, the qualitative and quantitative indicators were not always set at the right level of the intervention logic (be it at output, outcome or impact level) resulting in the collection of information and data which did not necessarily spoke to the related objective. Third, the incorrect use of the Gender Marker may have resulted in misrepresentation of EU actions. Fourth, reporting officers found the reporting mechanism burdensome (where data had to be manually entered in an excel file), confusing (in particular with regards to the Gender Marker) and time-consuming.

¹¹ According to the 2018 Annual Report, in 2018 for the Southern Neighbourhood 0,3%, for the Eastern Neighbourhood 2,6% and Enlargement countries 0,6% of actions were marked GM2.

¹² Page 37, Evaluation of the Instrument for Pre-Accession (2017).

¹³ Ibid. page 37.

Much can be done to improve the monitoring framework of the GAP and ensure that relevant data is captured and shared annually. GAP III indicators should be closely aligned to SDG indicators and include indicators from the EU Strategic Approach to Women, Peace and Security. Also, to generate data automatically GAP III indicators should be included in OPSYS, the EU platform designed to manage the EU external relations programmes and projects, which allows for aggregation of results and it is also accessible to implementing partners and the general public. A **simplified online tool**, such as a survey with multiple choice answers, should replace the current excel files and allow for a more intuitive, time-saving and user-friendly process. An improved monitoring framework should also be coupled with an annual report more geared towards sharing **clear and understandable data on EU's contribution to gender equality in partner countries**, including summaries of EU actions and spending contributing to GAP objectives in each country. This would in turn strengthen the EU's accountability to both EU citizens and beneficiaries of EU actions, including specifically women and girls in partner countries.

Annex I

GAP II Thematic Priorities and Objectives

A. Thematic Priority: Institutional Culture Shift

1. Increased coherence and coordination amongst EU institutions and with Member States
2. Dedicated leadership on gender equality and women's and girls' empowerment established in EU institutions and Member States
3. Sufficient resources allocated by EU institutions and Member States to deliver on EU gender policy commitments
4. Robust gender evidence used to inform all EU external spending, programming and policy making
5. Results for women and girls measured and resources allocated to systematically track progress
6. Partnership fostered between EU and stakeholders to build national capacity for gender equality

B. Thematic Priority: Physical and psychological Integrity

7. Girls and women free from all forms of violence against them (VAWG) both in the public and private sphere
8. Trafficking of girls and women for all forms of exploitation eliminated
9. Protection for all women and men of all ages from sexual and gender-based violence in crisis situations; through EU supported operations
10. Equal access to quality preventive, curative and rehabilitative physical and mental health care services for women and girls
11. Promoted, protected and fulfilled right of every individual to have full control over and decide freely and responsibly on matters related to their sexuality and sexual and reproductive health, free from discrimination, coercion and violence
12. Healthy nutrition levels for girls and women and throughout their life cycle

C. Thematic Priority: Economic Social and Cultural Rights

13. Equal access for all girls and women to all levels of quality education and vocational education and training (VET) free from discrimination
14. Access to decent work for women of all ages
15. Equal access by women to financial services, productive resources including land, trade and entrepreneurship
16. Equal access and control over water, energy, transport, infrastructure and equitable engagement in their management, enjoyed by girls and women

D. Thematic Priority: Political Rights and Participation

17. Equal rights and ability for women to participate in policy and governance processes at all levels
18. Women's organisations and other CSOs and Human Rights Defenders working for gender equality and women's and girls' empowerment and rights freely able to work and protected by the law
19. Challenged and changed discriminatory social norms and gender stereotypes
20. Equal rights enjoyed by women to participate in and influence decision-making processes on climate and environmental issues