



Kosovo Women's Network

Serving, Protecting and Promoting the Rights of Women and Girls

POLICY BRIEF

FOLLOWING THROUGH ON EU COMMITMENTS TO GENDER EQUALITY

Lessons Learned from GAP II to Inform GAP III

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INTRODUCTION

Gender equality is a fundamental value of the European Union (EU).² In 2015, the European Commission (EC) adopted “Gender Equality and Women’s Empowerment: Transforming the Lives of Girls and Women through EU External Relations 2016-2020”, also known as the “Gender Action Plan II” (GAP II).³ This plan was developed based on lessons learned from the first EU gender action plan. It introduced several important measures related to “institutional cultural shift”, towards an improved EU approach in furthering gender equality in all EU external actions worldwide. It called for context-relevant actions to further gender equality, informed by gender analysis. Importantly, it also introduced mandatory annual reporting for the EU on GAP II progress.

As GAP II’s fourth year draws to a close, discussions begin surrounding GAP III, proposals arise for a potential comprehensive Gender Action Plan for the EU and the EU Multiannual Financial Framework for the next seven years is finalized, the time is ripe to take stock of lessons learned from GAP II that can inform these processes. This brief draws from the experiences of the Kosovo

¹ The Kosovo Women’s Network (KWN) is a network of 158 diverse women’s rights organisations in Kosovo, which seeks to protect and promote the rights of women and girls in Kosovo in accordance with its [Strategy](#). The EU Office in Kosovo has contracted KWN to support the implementation of GAP II, including annual reporting since 2016. KWN also has collaborated with the Kvinna till Kvinna Foundation and women’s rights groups in the region to independently monitor progress towards implementing GAP II in WB countries, publishing a report entitled [Mind the GAP](#) (2018). This brief draws from knowledge gained and lessons learned from these experiences. Additionally, this brief has been endorsed by the following women’s rights groups WB: Center of Women’s Rights (Zenica, Bosnia and Herzegovina); Foundation United Women Banja Luka; Helsinki Citizens’ Assembly Banja Luka; Reactor Research in Action (North Macedonia); and Women’s Rights Centre (Montenegro).

² Article 1 of the Treaty of Lisbon, Amending the Treaty on European Union and the Treaty Establishing the European Community, 2007, at: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2007:306:FULL:EN:PDF>.

³ European Commission, SWD(2015) 182 final, 2015, at: https://ec.europa.eu/europeaid/sites/devco/files/staff-working-document-gender-2016-2020-20150922_en.pdf.

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Women's Network (KWN) and its partners in the Western Balkan (WB) region in discussing key areas in which lessons have been learned from GAP II; it then puts forth recommendations to address these issues.

LESSONS LEARNED FROM GAP II

Weak Legal Basis

As a Staff Working Document, GAP II's weak legal basis arguably has undermined its implementation. Since it is not legally binding, responsible parties have not taken it as seriously as they would if it were incorporated within EU regulations.⁴ For example, the Common Implementing Regulation "laying down common rules and procedure for the implementation of the Union's instruments for financing external action" does not include sufficient requirements for gender impact assessment or gender mainstreaming.⁵ Therefore, despite requests in GAP II, gender has not been mainstreamed in programming as part of a standardized and institutionalized approach. In WB countries, the fact that the midterm review of the Instrument for Pre-Accession (IPA) II did not contain any gender analysis or gender perspective was telling; GAP II seemingly was considered irrelevant to the external financing of the EU in the WB.⁶

Insufficiently Inclusive Drafting Process

Lessons learned from GAP II suggest that practitioners involved in its implementation and the encoding of EU programs perhaps were insufficiently engaged in drafting GAP II. Thus, GAP II involved some challenges that perhaps could have been avoided. For example, the language used in GAP II did not align with the language used by the EC in programming, such as "impact", "outcome" and "output" in logical frameworks. This made it difficult for programmers to align programs with GAP objectives.⁷

Women's rights organisations (WCOS) are well-placed to support the implementation of GAP by raising awareness about its existence and supporting EU delegations (EUDs)⁸ and Member States (MSs) in its implementation. WCOSs have extensive knowledge and experience that can support gender analysis, gender mainstreaming of programs, reaching diverse women and men during program implementation and gender sensitive evaluations. However, conversations with several WCOSs worldwide suggested that they lacked awareness about GAP II's existence. Nor were they consulted sufficiently in its design. This represents a lost opportunity for supporting implementation.

No Attention to Men, Boys or Root Causes

Gender analysis has shown that in most all sectors and areas women tend to be unequal compared to men. Even so, for a plan towards equality among women and men, GAP II paid astonishingly little attention to men, boys, gender relations and targeting root causes of gender inequalities. Additionally, experience suggests that framing gender equality solely with respect to women can lead to misunderstandings regarding what gender equality entails. In worse case

⁴ For example, see KWN, *Mind the GAP*.

⁵ The Common Implementing Regulation (EU) No. 236/2014 of the European Parliament and of The Council of 11 March 2014 "laying down common rules and procedure for the implementation of the Union's instruments for financing external action".

⁶ For further information, see: KWN, "[A Gendered Reading of the 'External Evaluation of the Instrument for the Pre-Accession Assistance'](#)", 2017.

⁷ For further information on this, see the indicators section [below](#).

⁸ KWN acknowledges that Kosovo has an EU Office, rather than an EUD. However, the term "EUD" is used to refer to both for simplicity.

scenarios, this can contribute to resistance from men, undermining efforts to further gender equality.

Unaligned Programming and Budget Cycles

The GAP II timeframe did not align with EU programming cycles, particularly in EU accession countries. Programming and budgeting are carried out several years prior to implementation. Therefore, when GAP II ends, several programs planned to contribute to its implementation will have just begun or not yet begun. Therefore, the impact will not be measurable in relation to GAP II.

Further, in most WB countries, the EU intends that beneficiary governments have ownership over IPA programming. Governments are responsible for requesting IPA funds in accordance with existing sector strategies and towards implementing required reforms towards EU Accession. This presents a fundamental challenge for EUDs in the region to implement GAP II. While they can apply political pressure, as foreseen by GAP II, they rely on beneficiary countries to agree to gender mainstreamed and gender equality specific programs. In some instances, EUD officials seemed hesitant to encourage governments to address gender inequalities and to incorporate GAP II thematic objectives in programming.⁹ This suggests that some EUD officials still treat furthering gender equality as an “optional” fundamental right, rather than as an essential requirement that governments must adhere to if they want to receive EU financing.

Related, some EUD representatives noted that increasing funding for women and girls would depend on the beneficiary government’s priorities and not on the EUD.¹⁰ The GAP II weakly stated: “Change (increase or decrease) in dedicated funding to improving results for girls and women after reviews and 2017 MTR (or equivalent)”.¹¹ Worryingly, this phrasing even *allows* for a decrease in funds. The imprecise phrasing of this indicator meant that GAP II did not clearly encourage increasing funding towards gender equality, though several studies have clearly established the need for such funding.¹² Moreover, the midterm review (MTR) failed to properly assess existing funding as foreseen in this indicator, as gender analysis for informing funding needs. Thus, GAP II did not include binding measures for funding towards gender equality. Perhaps unsurprisingly, as of 2018, with few exceptions, EUDs and MSs in the WB tended to indicate that they had not changed funding significantly since the adoption of GAP II.¹³ A tendency was observed to gender mainstream existing programs, rather than initiate new programs to address gender inequalities identified through gender analysis.

Confusing Intervention Logic

Being able to measure change is important for monitoring, evaluation and justification of resources related to the EU GAP II. Generally, the EU tends to use the standardized Logical Framework Approach for most of its programming in measuring change. This involves presenting indicators at each level of an intervention logic to measure the achievement of the impact (long-term change), outcomes (midterm changes) and outputs (short-term changes). Several issues existed with the GAP II intervention logic:

⁹ KWN interviews for *Mind the GAP*.

¹⁰ KWN, *Mind the GAP*, 2018.

¹¹ Indicator 3.1.1.

¹² For example, see Miller, J., Arutyunova, A., Clark, C., & Association for Women's rights In Development (AWID), *New actors, new money, new conversations: A mapping of recent initiatives for women and girls*, AWID, 2013; Batliwala, S., Rosenhek, S., & Miller, J., *Women moving mountains: Collective impact of the Dutch MDG3 Fund*, AWID, 2013; Arutyunova, A., & Clark, C., *Watering the leaves, starving the roots: The Status of Financing for Women's Rights Organizing and Gender Equality*, AWID, 2013; [Wave Country Report 2017](#); and Kvinna till Kvinna's [Women's Rights in the Western Balkans](#).

¹³ Interviews with 27 funders from EUDs or MSs in 2019 for forthcoming research by WCSOs in the region on funding trends.

- GAP II indicators are presented in a single list. Therefore, it is unclear to which level of an intervention logic they refer. Some seem in reference to impact (e.g., the percentage of girls and women who have experienced partner-violence), whereas others refer to outputs (e.g., the number of gender champions appointed, or persons trained). The presentation of all indicators in a mixed list, rather than at each level of the intervention logic, made GAP II indicators confusing and difficult for practitioners to incorporate in the logical frameworks of their programs; they struggled to identify at which levels of intervention logics GAP II indicators should be placed.
- GAP II does not have baselines or targets. EUDs only have been required to report annually on *which* objectives and indicators that they have selected. They have not been required to report on baselines, targets or the extent to which targets have been achieved. Therefore, the EU cannot measure progress in implementing GAP II. This weakens accountability for implementing it. It also represents a lost opportunity for showing changes, which could have supported advocacy for GAP III and for resources to support it.
- The sheer number of indicators in GAP II related to institutional cultural shift may undermine interest and willingness to participate in reporting. Several indicators arguably do not show changes. For example, the appointment of “gender champions” is a nice activity, but it does not necessarily involve changes towards gender equality. Arguably it should be an activity and not an indicator.
- Some GAP II indicators are poorly phrased. For example, several indicators do not require sex-disaggregated data (see Annex 1).
- GAP II recognizes that “Human Rights Defenders, women’s organisations and women leaders play critical roles too, often putting themselves at risk”. Objective 18 states: “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 law”. However, the indicators for this objective focus solely on legal protections and the number of “women Human Right Defenders who have received EU Support”. The indicator does not clearly state which kind of support: political, financial and/or other. Nor do any indicators reflect EU financial and political support to WCSOs, focusing only on individual leaders. As a result, GAP II does not clearly encourage or require monitoring and reporting on direct support provided to WCSOs as key instigators of change towards gender equality. Thus, the EU does not maintain accurate data and cannot report on its support to furthering gender equality, women’s rights and/or WCSOs, respectively.

Challenges to Accurate Reporting

Introducing mandatory reporting was very important for encouraging improved responsibility for implementing GAP II. While not all EUDs and MSs treated this responsibility in the same way, it clearly contributed to improved accountability for some. However, the fact that the reporting system for GAP II was complicated and confusing had a counter-effect in that EUDs and MSs tended to consider the exercise frustrating rather than useful. Opportunities existed to simplify the process by introducing easier technological solutions, such as by using a simple online survey and institutionalizing regular reporting. This would have reduced error due to memory loss between annual reporting exercises. It also would have made more efficient use of time, as gender focal points would save dozens of hours spent checking and merging data, which could have been done by a computer.

Concerningly, the current reporting system also results in skewed, inaccurate reporting. For example, EUDs only report on programs that seek to contribute to gender equality; they do not

report on all programs, which is a major flaw.¹⁴ If data is reported *only* on programs already contributing to gender equality, and not on *all* EU-funded programs, then reporting provides an inaccurate picture of the actual percentage of *all* programs that have been designed in accordance with GAP II. Notably, failing to ensure that all EU programs undergo gender analysis also hinders accurate reporting on the OECD gender marker, which requires gender analysis to determine the appropriate marker.

Limited Albeit Improved Staff Knowledge

In 2018, several EUD officials suggested that gender mainstreaming is of no value, but rather a “box-ticking exercise”. Such statements suggested that they had not had enough capacity development regarding what gender mainstreaming involves or its benefits. Practical skills seemed to be lacking in mainstreaming gender at all phases of IPA programming: design, implementation, monitoring and evaluation. The fact that the EC still in 2019 had not revised job descriptions to reflect obligations for all staff to further gender equality also meant that staff did not necessarily see this as part of their responsibilities.

A best practice was identified in Kosovo where the EU Ambassador made basic gender training obligatory for all staff members. Staff members reported that this enhanced their knowledge and capacities. This was coupled with tailored coaching in mainstreaming gender in programs. The extent to which gender has been mainstreamed in programs has clearly improved between 2015 and 2019 following capacity development interventions. Another best practice was introducing required review of programs by gender equality experts from local WCSOs, which both ensured their engagement as per GAP II and contributed to reflecting accurate gender analysis within programs.¹⁵

RECOMMENDATIONS

Make Commitments Legally Binding

- Several principles and best practices outlined in GAP II should be institutionalized by making them legally binding within EU law. Consider introducing in the forthcoming Common Implementing Regulation (CIR) for implementing EU instruments for financing external action¹⁶ basic requirements towards furthering gender equality through all external financial instruments. This could be done in a manner similar to the current CIR requirement for appropriate environmental screening for impacts.¹⁷ This would address recommendations from the European Parliament Committee on Women’s Rights and Gender Equality Report on EU funds for gender equality, which calls for “gender-specific indicators to be applied in the project selection, monitoring and evaluation phases of all actions that receive funding from the EU budget” and “mandatory gender impact assessment as part of general ex-ante conditionality, and for the collection of gender-disaggregated data on beneficiaries and participants”.¹⁸ Additionally and more specifically the new CIR could require:

¹⁴ For example, indicators refer to the number of programs that use gender analysis to inform design [which would be a more accurate indicator if phrased as a percentage, rather than a number, considering that “all” programs should be informed by gender analysis according to Objective 4]; percentage of programs that use findings from consultations with NGEMs and WCSOs, and percentage of results disaggregated by sex where relevant, among others.

¹⁵ Further details available from the Kosovo Women’s Network.

¹⁶ To replace Regulation (EU) No. 236/2014 of the European Parliament and of The Council of 11 March 2014 “laying down common rules and procedure for the implementation of the Union’s instruments for financing external action”, following the adoption of the new seven-year Multiannual Financial Framework.

¹⁷ Ibid, Article 2, section 6.

¹⁸ 2016/2144(INI), 2017, at: http://www.europarl.europa.eu/doceo/document/A-8-2017-0033_EN.html?redirect.

- Mandatory gender impact assessment, as part of a general ex-ante conditionality to inform programming, in accordance with European Institute for Gender Equality (EIGE) guidance,¹⁹ and the OECD DAC criteria requirements.²⁰
- Gender impact assessment as part of all evaluations, such as within the present CIR section on “Monitoring and evaluation of actions”.
- Gender responsive budgeting, including related to programs and EU consolidated systems for tracking, monitoring and evaluating overall expenditures related to gender equality.²¹
- Adopt GAP III as a policy document, including a strategy and action plan with a budget. It should take into consideration lessons learned from GAP II.
- Adopt an accompanying Staff Working Document that can support continued capacity development and changes of attitude within the EU, towards enhancing the implementation of other policies towards gender equality.

Ensure an Inclusive Drafting Process

- Ensure practitioners, including program officers from EUDs and gender focal points, and diverse WCSOs knowledgeable of GAP II (including those working at the national level), are engaged in drafting GAP III, towards enhancing its applicability and implementability.

Attend to Men, Boys and Gender Relations

- Include more attention to men, boys and gender relations, while ensuring that inequalities facing women are prioritized. Areas to consider may include introducing early education curricula that transforms gender norms and relations; improving conditions for paternity leave towards more balanced roles in the private sphere, as foreseen in the new Work-Life Balance Directive; and tackling power relations, such as through correctional programs. Utilize context specific gender analyses to identify relevant programs.

Ensure Continuity and Political Prioritization

- Ensure some continuity between GAP II and GAP III objectives and indicators so that long-term impact on key gender inequalities can be monitored and evaluated. These should be aligned with the EU Results Framework and the Sustainable Development Goals.
- Strongly encourage EUDs to establish baselines and targets as part of the 2019 annual GAP II reporting in early 2020. These could be used in planning GAP III, enabling continuity. Setting targets also could enable greater accountability in reporting progress over time.
- Deliver a stronger message to EUDs with GAP III that gender equality is not optional or extra, but a fundamental value of the EU and, as such, furthering gender equality is a requirement for most EU programming. In addition to placing these requirements in the coming Common Implementing Regulation of the Union’s external financial instruments, continue supporting attitude changes and knowledge advancement among EU staff regarding the importance of furthering gender equality through programming, as well as practical techniques for doing so.

¹⁹ See: <https://eige.europa.eu/gender-mainstreaming/toolkits/gender-impact-assessment/what-gender-impact-assessment>.

²⁰ For further information regarding OECD/DAC requirements related to the gender marker, see: <https://www.oecd.org/dac/gender-development/dac-gender-equality-marker.htm>.

²¹ For example, this could be included in a paragraph after the current CIR, Article 14. EIGE guidance can be followed: <https://eige.europa.eu/publications/gender-budgeting-mainstreaming-gender-eu-budget-and-macroeconomic-policy-framework>.

Strengthen and Hone GAP III Indicators, Baselines and Targets

- Review closely GAP II indicators to inform GAP III. Establish clear indicators to measure changes at each level of the GAP III intervention logic: impact, outcome and output. Clear indicators at each level are important for measuring short-term, mid-term and long-term changes.
- Consider reducing the number of indicators related to institutional cultural shift, focusing on key, strategic indicators.
- Ensure indicators are disaggregated by sex, where relevant.
- Establish clearer objectives and indicators that earmark “dedicated funding” for furthering gender equality and women’s rights. Earmark funds specifically for WCSOs.
- Improve data collection, maintenance and regular reporting on EU funding allocated and spent on each of the following respective categories within the new EU operational information system (OPSYS) and other systems:
 - Furthering gender equality;
 - Furthering women’s and girls’ rights; and
 - Supporting WCSOs as key actors in furthering gender equality.

Simplify Reporting

- Several opportunities exist to simplify reporting on GAP implementation, detailed in Annex 2. These will contribute to a more user-friendly reporting process and decrease human error.

Institutionalize Gender Equality Review and Continue Developing Staff Capacities

- In Brussels, Human Resources urgently need to update templates for job descriptions and contracts to include relevant responsibilities related to furthering gender equality within positions at all levels. Perhaps draw from the work of the European External Action Service (EEAS) in this regard.
- Establish a standardized process of gender quality assurance with gender experts reviewing all programs from a gender perspective. A clear process of quality review pertaining to gender equality should be established at delegation level, with adequate resources allocated. The experience of MSs, such as the Austrian Development Agency and Swedish International Development Agency could prove informative.
- Consider establishing full-time gender adviser positions in all delegations in both programming and political sections for large delegations and as a shared position for smaller delegations.
- Establish obligatory training for all staff at all levels. Allocate resources for tailored coaching for staff in gender equality related to their work.

ANNEX 1. GAP II INDICATORS NOT DISAGGREGATED BY SEX

This annex was taken directly from Annex 4 of Farnsworth and Banjska for the Kosovo Women's Network, Mind the GAP:

Several GAP II indicators do not request data that is disaggregated by sex, such as the following that relate to the EURF:

- 7.5. N# of individuals directly benefiting from Justice, Rule of Law and Security Sector Reform programmes funded by EU
- 9.6. N# of individuals directly benefiting from EU supported programmes that specifically aim to support civil and post-conflict peace building and/ or conflict prevention
- 10.4. N# of people with advance HIV infection receiving antiretroviral drugs with EU support
- 10.5. N# of 1-year olds immunised with EU support
- 12.5. N# of women of all ages, but especially at reproductive age, and children under 5 benefiting from nutrition related programmes with EU support
- 12.6. N# of food insecure people receiving assistance through social transfers supported by the EU
- 13.7 N# of children enrolled in primary education with EU support
- 13.8 N# of children enrolled in secondary education with EU support
- 13.9 N# of teachers trained with EU support
- 13.10. Ratio of female to male who have benefitted from Vocational Education and Training / Skills development and other active labour market programmes with EU support
- 16.1. Proportion of population using an improved drinking water source
- 16.7. N# of people with access to all season roads with EU support.

Additional GAP II indicators besides those related to the EURF also do not request sex-disaggregated data. Sex-disaggregated data is essential for a Gender Action Plan in order to enable accurate reporting.

ANNEX 2. HOW TO SIMPLIFY REPORTING

This annex contains several specific recommendations as to how the EU can simplify reporting on GAP II.

- Institutionalize reporting related to programming by including key indicators inside OPSYS. This will enhance accountability, decrease human error, improve the quality and accuracy of data, decrease time required for reporting, and reduce administrative burdens related to annual reporting on GAP. Data then can be withdrawn from the system in a more consistent form. More specifically, add to OPSYS the following obligatory questions that relate to GAP II:²²
 - 1) Was a gender analysis conducted to inform the design of the program? Yes/No
 - 2) If no, has it been planned to be conducted at a later date
 - 3) Were Gender Equality Mechanisms consulted in the program design? Yes/No
 - 4) Were women's rights organisations consulted in the program design? Yes/No
 - 5) Were all relevant indicators disaggregated by sex? Yes/No
 - 6) Was the program commented on by a gender expert and subsequently revised as part of quality assurance review? Yes/No
 - 7) Does it have at least one objective towards gender equality? Yes/No
 - 8) Does it have an indicator for that objective? Yes/No
 - 9) Is it a gender marker: 0/1/2 [*Note that the system should then check if "yes" was selected for questions 1, 7, and 8, and if not, an error message should appear.*]
 - 10) If gender marker 0, please provide a justification. [*This should be obligatory.*]
 - 11) Which GAP II objectives does it contribute to? [*Drop down box; select all that apply.*]
 - 12) Which GAP II indicators does it contribute to? [*Drop down box; select all that apply.*]
 - 13) What is the baseline for this objective?
 - 14) What is the target for this objective?
 - 15) Was gender included in the evaluation? Yes/No
 - 16) If yes, what were the recommendations?
- Establish a system for regularly reporting on gender equality issues raised during political dialogues that can be updated regularly rather than annually, towards decreasing memory error.
- Rather than excel sheets, utilize an online survey instrument to collect and analyse data, thereby easing individual reporting, making more efficient use of human resources, and improving the accuracy of the data.

²² Additional recommendations for OPSYS are available upon request from the Kosovo Women's Network, based on a policy brief that they developed to inform the design of OPSYS from a gender perspective. Contact: Info@womensnetwork.org.