MIND THE GAP

AN INDEPENDENT EVALUATION OF THE
IMPLEMENTATION OF THE EU GENDER ACTION
PLAN II IN WESTERN BALKAN COUNTRIES

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Kosovo Women's Network
Serving, Protecting and Promoting the Rights of Women and Girls

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Contents

ACKNOWLEDGEMENTS

ACRONYMS AND ABBREVIATIONS

AD	Action Documents
CRIS	Common External Relations Information System
CSOs	Civil society organisations
DAC	Development Assistance Committee
DG NEAR	Directorate General for Neighbourhood and Enlargement Negotiations
EAMR	External Action Management Reports
EC	European Commission
ECHO	Directorate-General for European Civil Protection and Humanitarian Aid Operations
EEAS	European External Action Service
EIDHR	European Instrument for Democracy and Human Rights
EU	European Union
EUD	EU Delegation
EUO	EU Office
EURF	EU Results Framework
GAP	Gender Action Plan
GFP	Gender Focal Person/Point
HQ	Headquarters
IPA	Instrument for Pre-Accession
KWN	Kosovo Women's Network
MS	Member State
MTR	Midterm Review
N/A	Not Applicable or Available
NGEMs	National Gender Equality Mechanisms
OECD	Organisation for Economic Co-operation and Development
SDG	Sustainable Development Goal
SWD	Staff Working Document (referring to GAP II)
UN	United Nations
WB	Western Balkans
WCSOs	Women's rights civil society organizations

EXECUTIVE SUMMARY

In 2015, the European Commission (EC) and the European External Action Service adopted the second Gender Action Plan, "GAP II". It aims to further gender equality in all European Union (EU) external activities and relations. In August 2017, the EC published its first annual report on GAP II implementation in 2016. The report lacked sufficient information about GAP II implementation in Western Balkan (WB) countries, making it difficult for EU actors to identify country- and region-specific challenges in implementing GAP II. Women's rights civil society organizations (WCSOs) also lacked information that could enable them to support EU actors in implementing GAP II.

Therefore, in fall 2017, the Kvinna till Kvinna Foundation, the Kosovo Women's Network (KWN), and partner WCSOs decided to evaluate the implementation of GAP II in WB countries. This evaluation examined the extent to which the EU has implemented GAP II in each country, identifying best practices, challenges and opportunities for furthering GAP II implementation in 2018-2020. The evaluation focused on EU Delegations' (EUDs) implementation of GAP II's strategic priority for "Institutional Culture Shift". It did not examine all GAP II pillars. This summary outlines key findings and recommendations. Recommendations at the end of the paper identify the specific stakeholders responsible.

GAP II OBJECTIVE 1. INCREASE COHERENCE AND COORDINATION AMONG EU INSTITUTIONS AND WITH MEMBER STATES (MSS)

• EUDs seldom have raised gender equality issues with governments during political dialogues, largely because EU officials do not consider gender equality a priority. However, raising issues related to gender equality within political dialogues in all sectors is part of, rather than separate from, the "fundamentals first" agenda.

Recommendations
• Ensure Heads of Delegations and officials in political sections know their responsibilities under GAP II, including that gender equality should be part of the fundamentals first agenda and regularly raised in policy and political dialogues.

OBJECTIVE 2. DEDICATED LEADERSHIP ON GENDER EQUALITY AND GIRLS' AND WOMEN'S EMPOWERMENT ESTABLISHED IN EU INSTITUTIONS AND MSS

• The percentage of women heads of EUDs has increased, but women remain underrepresented.

• EUDs have not appointed gender champions.

• The extent to which managers have addressed gender equality seems to have depended more on individual will than on institutionalized practice.

• GAP II indicators have been selected in most WB countries, though this process involved insufficient consultation with WCSOs.

Recommendations
• Appoint more women as EU Heads of Missions when openings exist.

• Appoint gender champions including at least one man gender champion per country.

• Institutionalize the approach to furthering gender equality, ensuring managers regularly raise issues related to gender equality.

• Consult WCSOs in the future selection of GAP II indicators.

OBJECTIVE 3. SUFFICIENT RESOURCES ALLOCATED BY EU INSTITUTIONS AND MSS TO DELIVER ON EU GENDER POLICY COMMITMENTS

• Regrettably, funding for improving results for girls and women was not evaluated during the 2017 Midterm Review.

• Current data management systems preclude accurate monitoring of funding to women and girls, gender equality, and WCSOs, respectively.

• The EU has not allocated adequate human resources to implementing GAP II.

• Job descriptions have not been updated to require gender equality tasks as responsibilities for all.

• Human resources had limited but insufficient training on gender mainstreaming in IPA programming.

Recommendations
• Review GAP II indicators and data sources for improved accuracy, including ensuring that all require sex-disaggregated data.

• Establish GAP II indicators on "dedicated funding" for women and girls and WCSOs, respectively.

• Improve electronic data management systems, requiring reporting on dedicated funding for women and girls, gender equality, and WCSOs, respectively in OPSYS. Publish results annually, monitoring trends.

• Allocate adequate, dedicated human resources for implementing GAP II.

• Ensure that all EUD staff at all levels complete obligatory training on gender equality, including practical skills training on gender mainstreaming.

• Urgently update job descriptions at all levels to include gender equality responsibilities relevant to those positions.

OBJECTIVE 4. ROBUST GENDER EVIDENCE USED TO INFORM ALL EU EXTERNAL SPENDING, PROGRAMMING AND POLICY MAKING

• Gender analyses were conducted in all countries. However, few programs have used sector-specific gender analyses to inform their designs.

• EUDs have taken some positive measures to better mainstream gender in IPA programming.

• However, since beneficiary countries draft Action Documents (ADs) and should take ownership over them, EUD officials often hesitated to interfere with existing government strategies and planned actions, including encouraging governments to address gender inequalities within documents. The fact that governments, not EUDs, "own" these documents and base them on existing government strategies presents a fundamental challenge for ensuring gender equality is mainstreamed in ADs.

• EUDs have not consulted sufficiently or systematically with National Gender Equality Mechanisms (NGEMs), CSOs and WCSOs to inform IPA programs.

• Across all WB countries, WCSOs stated that they had little if any information about the EU Accession process, let alone specific ADs.

Recommendations
• Although final ownership over programming lies with beneficiary countries, EUDs can and should apply more political pressure related to furthering gender equality, sending a clear message to governments that gender equality is a priority for the EU and should be for governments as well.

• Establish a standardized process of gender quality assurance with gender experts reviewing all ADs.

• Ensure gender analyses are conducted to inform all sector ADs, as foreseen by GAP II.

• In the creation of new government strategies, laws, EU gender analyses, ADs and generally, ensure both the government and EUD regularly consults NGEMs and WCSOs. Such consultations also could support EUDs in

gathering input to better inform political dialogues from a gender perspective.

OBJECTIVE 5. RESULTS FOR WOMEN AND GIRLS MEASURED AND RESOURCES ALLOCATED TO SYSTEMATICALLY TRACK PROGRESS

• The EU Results Framework (EURF) has not been aligned with GAP II, and several GAP II indicators are problematic because they do not require sex-disaggregated data.

• Several challenges exist with using the OECD Gender Marker as an indicator: it may provide misleading information related to actual resources allocated for women and girls; officials tend to lack sufficient knowledge about it, contributing to subjectivity and inaccurate marking; and intervention logics within IPA programming templates limit the introduction of overall or specific objectives related to gender equality, towards receiving a G1 or G2 mark.

Recommendations
• Ensure that planned revisions to the EURF involve including GAP II indicators for regular reporting.

• Closely review and revise GAP II indicators to ensure that they explicitly require sex-disaggregated data.

OBJECTIVE 6. PARTNERSHIPS FOSTERED BETWEEN EU AND STAKEHOLDERS TO BUILD NATIONAL CAPACITY FOR GENDER EQUALITY

• EUDs have taken very few initiatives to foster partnerships between the EU and stakeholders to build national capacities for gender equality. Related, EUDs have provided little to no additional funding for research on gender equality, furthering capacities of NGEMs, and/or improved media reporting on gender equality, respectively.

• Coordination mechanisms on gender equality exist, but are weak and often ad-hoc.

Recommendations
• Improve data availability by allocating more resources to research and statistics related to gender equality.

• Strongly encourage and support local NGEMs in organizing systematic gender coordination meetings that involve both local and international stakeholders, including WCSOs.

• Allocate financial resources for furthering NGEMs' capacities to engage in countries' EU accession processes. Strongly encourage countries to include NGEMs in planning, implementing, monitoring and evaluating sector programs.

• Finance improved media awareness and reporting on themes related to gender equality.

OBJECTIVE 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 LAW

• The current indicators are poor measures of support to WCSOs. One indicator focuses on individual women Human Rights Defenders, but does not consider support to WCSOs.

• Insufficient financial support for WCSOs, particularly human resources, hinders WCSOs' ability to participate in EU Accession processes, including in consultations and advocacy work related to gender equality as foreseen in GAP II.

Recommendations
• Measure and report annually on: financial support provided to WCSOs, and to other CSOs working for gender equality and women's and girls' empowerment and rights, respectively.

• Earmark funds to support WCSOs, including women human rights defenders, particularly related to their support of GAP II implementation and mainstreaming gender in EU accession processes.

INTRODUCTION

In September 2015, the European Commission (EC) and the European External Action Service (EEAS) adopted a Staff Working Document (SWD) titled "Gender Equality and Women's Empowerment: Transforming the Lives of Girls and Women through EU External Relations 2016-2020". Commonly referred to as the second Gender Action Plan, or, more simply, "GAP II", the document aims to further gender equality in all European Union (EU) external activities and relations.[1] Endorsed by the European Council on 26 October 2015, GAP II identifies several "EU actors" who are responsible for its implementation: EC services (including the Directorate General for Neighbourhood and Enlargement Negotiations, "DG NEAR")[2] and EEAS at both headquarters (HQ) and EU Delegation (EUD) levels,[3] as well as EU Member States (MSs).

GAP II contains four strategic priorities. The first strategic priority concerns "Institutional Cultural Shift" as a "precondition to achieve gender equality". Three "thematic priorities" focus on physical and psychological integrity; economic and social rights; and voice and participation, respectively. EU actors must undertake annual, "systematic reporting" on objectives pertaining to "Institutional Culture Shift".[4] According to the European Council, "Delivery against the measures and transparent reporting on progress and setbacks are expected, as an established practice" towards improving the "effectiveness of EU initiatives and their impact on gender equality [and] accountability of EU initiatives to EU institutions and citizens, and ultimately to beneficiaries".[5] Thus, the Council encourages identifying successes and challenges affiliated with GAP II implementation, facilitating learning and supporting adjustments in approach towards furthering GAP II implementation and therefore gender equality.

In August 2017, the EC published the first annual report on the implementation of GAP II in 2016.[6] It reviews progress worldwide. However, the report used Organisation for Economic Co-operation and Development (OECD) regions, which differ from regional areas as defined by the EU. The report did not contain a sufficient level of detail for Western Balkan (WB) countries. Additionally, women's rights civil society organizations (WCSOs) working in the WB did not feel that the report accurately represented their experiences with GAP II. In September, CONCORD published a brief analysis of the EC's annual report, providing additional recommendations.[7] However, it was not specific to the experiences of WB countries either. Insufficient information about GAP II implementation in WB countries makes it difficult for EU actors to identify country- and region- specific challenges in implementing GAP II. Moreover, WCSOs lack information that could enable them to support EU actors in implementing GAP II.

Therefore, the Kvinna till Kvinna Foundation, the Kosovo Women's Network (KWN), and their partner WCSOs in WB countries decided to conduct an independent evaluation of GAP II in the WB. The evaluation sought to examine the extent to which GAP II has been implemented in each country, identifying best practices, challenges and opportunities for furthering its implementation in 2018-2020. The evaluation examined GAP II implementation in 2016, but also collected some current information. The evaluation focused on the GAP II's "Institutional Culture Shift" strategic priority, based on the assumption that, given programming cycles, it would be difficult to examine impact related to the three thematic priorities after GAP II's first year of existence. Also, examining MSs' contribution to GAP II implementation was beyond the scope of this evaluation.[8] The evaluation involved review of relevant documents and interviews conducted in September and October 2017 in seven locations in six WB countries: Pristina, Sarajevo, Banja Luka, Belgrade, Skopje, Tirana, and Podgorica. KWN conducted individual and group semi-structured interviews with 92 key stakeholders from these and other

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[1] At: http://ec.europa.eu/europeaid/sites/devco/files/staff-working-document-gender-2016-2020-20150922_en.pdf
[2] In addition to the six countries examined here, DG NEAR it includes: Turkey, Algeria, Egypt, Lebanon, Palestine, Armenia, Georgia, Libya, Syria, Azerbaijan, Israel, Moldova, Tunisia, Belarus, Jordan, Morocco, and Ukraine.
[3] In this paper, to facilitate reading, the acronym "EUD" is used generally to refer to both EU delegations in WB countries and the EU Office in Kosovo, unless otherwise specified.
[4] At: http://www.consilium.europa.eu/en/press/press-releases/2015/10/26-fac-conclusions-gender-development/.
5 Council Conclusions, p. 8.
[6] Joint Staff Working Document, "EU Gender Action Plan II: "Gender Equality and Women's Empowerment: Transforming the Lives of Girls and Women through EU External Relations 2016-2020", Annual Implementation Report 2016, SWD(2017) 288 final, Brussels: 29 August 2017, at: https://ec.europa.eu/transparency/regdoc/rep/10102/2017/EN/SWD-2017-288-F1-EN-MAIN-PART-1.PDF.
[7] CONCORD, CONCORD Analysis and Recommendations Gender Action Plan Report 2016, 2017.
[8] This would have required significantly more resources, namely time and human resources, than were available.

locations within each country, including representatives of EUDs, relevant governmental bodies coordinating EU accession processes, National Gender Equality Mechanisms (NGEMs), WCSOs, and UN agencies.[9] Questions related to objectives and indicators enlisted in the "Institutional Culture Shift in the European Union External Relations" section of the GAP II monitoring and accountability framework.

This paper summarizes the evaluation findings. As encouraged by the European Council, it provides information on both progress and shortcomings, towards identifying targeted recommendations for all stakeholders. The paper's title thus calls upon all stakeholders to "Mind the GAP", in terms of paying close attention to GAP II and its implementation. At the same time, the title points to the remaining gap between GAP II objectives and their full implementation.

FINDINGS

The overall goal of the "Institutional Culture Shift in the European Union External Relations" priority is that the "EU will continue to ensure that its commitments on gender equality are translated into clear and tangible outcomes and are accompanied by improved coordination, coherence, leadership, gender evidence and analysis, and adequate financial and human resources." This section discusses the extent to which EUDs and EU actors in the WB implemented each objective related to Institutional Cultural Shift. GAP II indicators are used to measure progress, and findings are presented in numerical order, as they appear in GAP II.[10]

OBJECTIVE 1. INCREASED COHERENCE AND COORDINATION AMONGST EU INSTITUTIONS AND WITH MSS

Indicator 1.1.2. N# of political/policy dialogue between EU actors and partners in the country that raise gender equality issues per year and at country level

The actors responsible for this indicator include Commission services (EC), EEAS, and MSs. The EC's 2016 Annual Implementation Report of the EU GAP II states, "there has been minor progress in mainstreaming gender perspectives into political and policy dialogues with partners".[11] The report attributes this to programming priorities, the fact that key indicators were finalized before GAP II entered into force and weak evidence due to confidentiality issues. While dialogues have existed regarding violence against women, the report concludes, "there is little evidence that gender equality dimensions are on the agenda in all dialogues".

In WB countries, based on interviews with EUD representatives, the precise numbers requested by this quantitative indicator seem unavailable. Qualitatively, EUDs described a few examples. In Montenegro, the EUD entered into political dialogue with the government over the poorly planned new state policy that led thousands of women with three or more children to leave the labour market for state benefits.[12] In Bosnia and Herzegovina, the EUD organized discussions with women mayoral candidates during elections. In Macedonia, gender equality issues were raised during sub-committee meetings, such as with Justice and Home Affairs, and in meetings with the Ministry of Labour and Social Policy. Overall, in conclusion, in only a few specific instances have EUDs raised gender equality issues with governments during political dialogues. Gender equality has not been consistently discussed as part of political and policy dialogues pertaining to all sectors. Several issues seemingly hindered progress on this indicator. First, several EUD officials were either entirely unfamiliar with GAP II or did not know anything about this indicator. Weak knowledge regarding

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[9] Annex 2 provides further information about the methodology. All findings and quotations are from interviews unless otherwise noted.
[10] Not all GAP II indicators are discussed. See Annex I for information as to why certain indicators were examined and others were not.
[11] EC, 2016 Annual Implementation Report, p. 3.
[12] Women's Rights Centre, "The Protest of Mothers: A Case Study", July 2017; see: http://www.rtcg.me/vijesti/drustvo/183838/bivse-korisnice-naknada-u-delegaciji-eu.html.

their responsibility to raise gender equality issues during political dialogues was a key reason as to why they had not done so.

Second, a recurring theme among EUD officials was that they need to "prioritize"; gender equality could be addressed after countries "deal with priorities", such as corruption, political instability and weak rule of law. "National" and "high political" priorities seemingly take precedence over what are perceived as "soft issues" like gender equality. As one EU official said, "To be honest, [...] gender is not a priority." EU officials tend to interpret the EU's "fundamentals first" agenda to exclude addressing gender inequality, even though gender equality should be treated as a fundamental right. Key gender equality issues in the WB relate directly to fundamental rights issues of access to justice (including for crimes involving gender-based violence), property rights, anti-discrimination, and women's labour rights, among others. Thus, treating fundamental issues "first" is not at odds with addressing gender inequalities. Rather, addressing gender inequalities is an integral part of the fundamentals first agenda, particularly rule of law and fundamental rights.[13] Rule of law reforms must address systematic gender-based discrimination against women because a justice system that fails to ensure access to justice for half the population is a failed system.[14] Actions tackling the informal economy must consider that women are likely over-represented within the informal economy and reforms must use the "do no harm" principle when addressing the informal economy.[15] Stating that gender equality is not a priority merely evidences a lack of knowledge that gender equality is a fundamental right and that most EUD officials have insufficient awareness regarding what gender mainstreaming means and how one mainstreams gender into policy reforms and political dialogues.

EUD officials seemed not to understand the importance and potential impact that EU officials can have by raising gender equality issues during political dialogues. As recognized by this GAP II indicator, EUDs must play a vital role in applying political pressure on governments to take gender equality seriously, as a fundamental European value related to democracy and non-discrimination that they must uphold and safeguard.

> **"There are so many messages we send to the government, we have to pick our priorities."**
> EUD OFFICIAL

> **"We always have to consider that we are dealing with a poor country, priorities need to be set."**
> EUD OFFICIAL

> **"The priority now is Accession. If gender was made priority, there would be more funding dedicated to this."**
> EUD OFFICIAL

OBJECTIVE 2. DEDICATED LEADERSHIP ON GENDER EQUALITY AND GIRLS' AND WOMEN'S EMPOWERMENT ESTABLISHED IN EU INSTITUTIONS AND MEMBER STATES

Indicator 2.1.1. N# of senior gender champions appointed at HQ and country level

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[13] Moreover, a significant literature demonstrates that treating gender inequalities as part of reform processes tends to lead to more efficient, effective and sustainable reforms. See The Frederick S. Pardee Center for the Study of Longer-Range Future, Are Women the Key to Sustainable Development?, Boston: 2010, at: https://www.bu.edu/pardee/files/2010/04/UNsdkp003fsingle.pdf.

[14] This is a serious issue throughout the WB. For example, see Nicole Farnsworth, Ariana Qosaj-Mustafa, Iliriana Banjska, Adelina Berisha, and Donjeta Morina for KWN, No More Excuses: An Analysis of Attitudes, Incidence, and Institutional Responses to Domestic Violence in Kosovo, Pristina: KWN, 2015, at: https://womensnetwork.org/documents/20151124105025622.pdf, and KWN's forthcoming monitoring report (2018).

[15] See Chen, Martha, and Marilyn Carr, "Globalization, Social Exclusion and Work: With Special Reference to Informal Employment and Gender", International Labour Review 143, 2004, at: http://www.inclusivecities.org/wpcontent/uploads/2012/08/Carr_Chen_ILO_Gender_and_Globalisation.pdf.

A gender champion is someone besides the GFP, ideally in a high-level position, who will promote gender equality publicly on behalf of the EU and take the responsibility to regularly raise issues related to gender equality. Gender champions could include an ambassador from the EU or an MS in country, local authorities, a local actor, journalist, singer, and/or a renowned sports person, for example. The term "gender champion" seemed relatively unknown and little understood by most EUD representatives, though Gender Focal Persons (GFP)[16] generally knew the term. None of the EUDs in WB states had appointed gender champions yet.

> **I think gender equality issues are not high enough on the list of political priorities and that gender issues should be integrated at the policy level, not only in programming."**
> GFP, EUD

Indicator 2.2.1. Ratio of women as EU Heads of Missions (Baseline 2014: 24%)

In the WB, the ratio of women heads of EU missions improved, from 17% in 2014, with one of six EUDs led by a woman (Romana Vlahutin in Albania) to 33% in 2016. This resulted from the appointment of the new EU Special Representative to Kosovo, Nataliya Apostolova. As of fall 2017, women still led two of six EUDs, 33%.
Notably, while important in terms of gender balance, having women in decision-making positions does not always result in dedicated leadership on gender equality and women's rights. Both women and men EU officials have a responsibility in this regard.

Country	2014	2015	2016	2017
Albania	>1	1	1	1
Bosnia & Herzegovina	0	0	0	0
Kosovo	0	0	0>1	1
Macedonia	0	0	0	0
Montenegro	0	0	0	0
Serbia	0	0	0	0
Total # of women	1	1	2	2
Total % of women	17%	17%	33%	33%

Indicator 2.3.3. Perception by EU staff of management performance on gender

The EC and EEAS should measure progress on this indicator via an annual staff survey, seemingly not yet conducted. However, the Annual Implementation Report 2016 lists some examples of how GAP II has resulted in more dedicated leadership, demonstrated by support for gender analyses, training and engagement in the 16 Days of Activism against Violence against Women.[17] The report does not examine EU staff perceptions of management performance.

KWN's interviews with WB EUD non-managerial staff suggest mixed performance on furthering gender equality, depending on the manager. One EUD manager regularly spoke about the importance of gender equality during staff meetings and encouraged staff to implement GAP II. Other managers had never mentioned GAP II. While some GFPs felt fully supported by management, others felt entirely unsupported. It "also depends a lot on Brussels and who is in charge there," an EU staff member said. "It depends a lot on their efforts and will."

The extent to which managers have addressed gender equality internally and externally seems to have depended more on individual will than on institutionalized practice. Evidence further suggests that some managers' poor leadership in addressing gender inequalities contributes to disinterest among some EU staff in taking steps to further gender equality as it relates to their responsibilities.

Indicator 2.3.4. N# of rewards or equivalents handed out to management/program staff as per agreed criteria

While the EC, EEAS, and MSs could provide rewards as incentives for improved delivery of results on gender equality, no evidence of such rewards was provided in the Annual Implementation Report 2016. Nor were examples

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[16] The Annex to the Council Conclusions on GAP II uses the terms "Gender Focal Point" and "Gender Focal Person" interchangeably. Here the acronym is used throughout.
[17] EC, Annual Implementation Report 2016, p. iii.

of awards given during interviews in the WB. If any agreed criteria have been identified, EUDs lacked information about such criteria.[18]

Indicator 2.4.1. Whether corporate reporting systems include a clear assessment of performance on the SWD objectives as a requirement

The EU Results Framework (EURF) contains a few Sustainable Development Goal (SDG) indicators pertaining to gender equality, but does not yet seem to have been updated to include GAP II objectives.[19] Therefore, EC and EEAS seem not to have institutionalized reporting on GAP II indicators yet, as part of the corporate reporting system. Questions pertaining to GAP II implementation were incorporated in the External Action Management Report (EAMR), though EUDs interpreted some questions in different ways.[20] The EAMR does not seem to have contained specific questions on GAP II indicators. The Annual Implementation Report 2016 discussed progress on this indicator only in Annex 1, referencing MS progress in institutional shift.

Indicator 2.4.4. N# of SWD objectives EUDs and MSs select to report against at country level

The EC, EEAS, and MSs should select GAP II objectives to report on annually at the country level. The table illustrates the number of GAP II objectives selected in each country as of 2016. WCSOs lacked information about this process and stated that they were not consulted in selecting SWD objectives, except in Kosovo. Gender analyses conducted for each sector may inform revisions to GAP II objectives and actions, based on the needs identified.

OBJECTIVE 3. SUFFICIENT RESOURCES ALLOCATED BY EU INSTITUTIONS AND MSS TO DELIVER ON EU GENDER POLICY COMMITMENTS

Indicator 3.1.1. Change (increase or decrease) in dedicated funding to improving results for girls and women after reviews and 2017 MTR (or equivalent)

The EC and MS should report on changes in dedicated funding for improving results for girls and women after reviews, particularly the 2017 Midterm Review (MTR). No baseline or target was set.

Worldwide, the Annual Implementation Report 2016 states that there is an "encouraging perspective", referring to OECD Gender Marker data as a source of evidence.[21] It is unclear which countries benefitted in which ways from actions marked G1 or G2. Moreover, the OECD Gender Marker involves a measure of all actions towards gender equality, which is much broader than funding "dedicated" to women and girls. Thus, there is an incongruence between the indicator and the data source. Further, while allocated funding may serve as an initial proxy indicator, EUDs can only measure accurately "dedicated funding to improving results" once programs conclude and actual funding that led to objectively verifiable results can be reported.

Country	Objectives
Albania	2
Bosnia & Herzegovina	10
Kosovo	24
Macedonia	0
Montenegro	3
Serbia	6
Total	45

The Annex to the Council Conclusions on GAP II suggests that the data source should be the MTR. However, as part of the MTR in WB countries, the External Evaluation of the Instrument for Pre-Accession Assistance II did not examine dedicated funding for women and girls.[22] Nor did the external evaluation of the Civil Society Facility assess the extent to which funding benefitted women and girls.[23] The European Parliament has stated that it, "Regrets [...] the Commission's decision not to address the issue

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[18] Awards criteria were not defined in the DG DEVCO "Guidance note on the EU Gender Action Plan 2016 – 2020", 2016.
[19] For further information, see the discussion under Objective 5, indicator 5.1.1.
[20] EC, Annual Implementation Report 2016, p. 26.
[21] For information about the OECD Gender Marker, see indicator 5.3.2. Additional challenges also exist.
[22] See Nicole Farnsworth and Iliriana Banjska from KWN for the Kvinna till Kvinna Foundation, "A Gendered Reading of the 'External Evaluation of the Instrument for Pre-Accession Assistance II'", Pristina: 2017.
[23] "Presentation of the findings of the evaluation of the Civil Society Facility", Pristina, 27 October 2017.

of implementing gender mainstreaming in its mid-term review of the MFF [Midterm Financial Framework], and calls for more specific action to address this".[24] Thus, this planned GAP II activity (3.1.) was not completed Now the EU lacks information for planning dedicated funding for improving results for girls and women. KWN sought to collect information through this evaluation, but shortcomings with existing electronic data management systems mean that EUDs cannot provide specific information related to this indicator. Based on their observations, most EUDs indicated that no significant change in funding has occurred since the adoption of GAP II. Some EUD representatives noted that increasing funding for women and girls would depend on the beneficiary government's priorities, and not on the EUD.[25] MSs and other donors may also contribute funding for women, girls, and/or gender equality, which can affect the focus and extent of EUD funding.[26] All of these factors must be considered and funding coordinated, drawing from improved data on such dedicated funding.

> **It really makes a difference if someone comes from Brussels to give a training [rather than] if I collect my colleagues to preach about gender equality."**
> GFP

> **"Gender mainstreaming is artificial. Our projects are for the benefit of everyone."**
> EUD OFFICIAL

Qualitatively, EUDs provided some examples of current programs that sought to improve results for women and girls. Several EUDs referenced the regional program "Implementing Norms Changing Minds" on combatting gender-based violence, implemented by UN Women. In Montenegro, since 2012, the EUD has dedicated funding to its Gender Programme, which may continue as part of IPA 2018 programming. Time will tell if these investments improve "results for girls and women".

Indicator 3.2.1. N# of staff, disaggregated by level, trained on gender equality per year, and reporting changes in the way that they work

The Annual Implementation Report 2016 did not contain any information regarding the number of staff trained on gender equality.[27] However, training may not have been reported. In Montenegro, EUD representatives mentioned a training provided by a gender expert. In Macedonia, EUD operations staff attended training by DG NEAR in June 2016. Some EUD staff received coaching in Kosovo and Albania. Persons in senior level positions seem to have received less training or coaching than persons involved in programming.

EUD representatives seemed to prefer practical coaching, directly related to Instrument for Pre-Accession (IPA) programming rather than "theory" or lectures. Employees at one EUD frowned upon prior training experiences with experts bringing gender mainstreaming examples from Africa that were irrelevant to the WB context. However, a GFP observed that when experts from Brussels or outsiders provided training, employees listened more carefully than to GFPs.

Several EUD officials at all levels suggested that gender mainstreaming is of no value, but rather a "box-ticking exercise". Such statements suggest that they have not had sufficient training regarding exactly what gender mainstreaming involves. Practical skills seemed to be lacking in mainstreaming gender at all phases of IPA programming: design, implementation, monitoring and evaluation.

Another recurring challenge noted in all delegations is high staff turnover. An official in a Cooperation Section stated, "because of high staff turnover, we should put more effort to integrate this among sectors." Since staff leave delegations regularly, mainstreaming gender requires further institutionalization within templates, as well as mandatory introductory training on gender mainstreaming.

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[24] Committee on Women's Rights and Gender Equality, "REPORT on EU funds for gender equality", (2016/2144(INI)), A8-0033/2017, 8 Feb. 2017, para. 71.
[25] Beneficiary government ownership over IPA processes affects GAP II implementation in many ways (see 4.2.2).
[26] Comment by EUD official (email correspondence Dec. 2017).
[27] EC, GAP II, p. 65.

Indicator 3.2.2. N# of gender focal persons (or equivalent) trained per year

According to the Annual Implementation Report 2016, nine GFPs attended training in 2016.[28] This includes GFPs from all WB countries. Several GFPs referred to this training during interviews. They highlighted the new knowledge and skills that they had gained from the EC Policy Officer on Gender Equality, Karolina Vrethem, who also provided substantial follow-up coaching. Several GFPs also noted as particularly useful an interactive exercise on mainstreaming gender in IPA programming documents, delivered by an expert from KWN, based on experience supporting the EU Office (EUO) in Kosovo.

Indicator 3.2.3. Gender mainstreamed into all training provided

While GAP II foresaw that gender would be mainstreamed into all training provided by 2017, interviews suggest that this has not occurred. The Annual Implementation Report 2016 did not include any examples of gender mainstreaming being incorporated into training in DG NEAR.[29]

Country	2016
Albania	1
Bosnia & Herzegovina	2
Kosovo	1
Macedonia	0
Montenegro	0
Serbia	1
Total	5

Indicator 3.3.1. N# of Gender Focal Persons (or equivalent) who have 3 years of gender expertise and/or more than 5 years of technical experience in a related field

According to the Annual Implementation Report 2016, five GFPs in all of DG NEAR (beyond WB) have three years of gender expertise and/or more than five years of related technical expertise. During interviews, some GFPs confided that they did not feel that they had sufficient expertise to carry out their roles and responsibilities as GFPs. Most GFPs said that they had little to no experience in gender equality related fields prior to being assigned the task of being a GFP. This suggests that persons appointing GFPs also lacked understanding regarding the level of knowledge and expertise required to support gender-mainstreaming work effectively.

Country %	2016
Albania	10-20
Bosnia & Herzegovina	30-40
Political Section	5-10
Kosovo	4-5
Macedonia	15
Montenegro	20
Serbia	30-40
Total	16-21

Indicator 3.3.2. N# of job descriptions that contain gender equality as an area of responsibility, by seniority

GAP II foresees that the EC, EEAS, and MSs will include furthering gender equality among the responsibilities of officials at all levels by including it within their job descriptions. The Annual Implementation Report 2016 did not contain any information regarding the number of job descriptions that contain gender equality as an area of responsibility in DG NEAR.[30] However, this may be due in part to the fact that job descriptions are created and approved in Brussels.[31]

With one exception, in WB countries, GFPs' job descriptions have not been updated to include their existing GFP responsibilities. Without clearly stated GFP responsibilities, GFPs often had to prioritize other tasks over their GFP work, giving them less time to spend on gender specific issues and tasks.

> **"I have never understood how to do meaningful gender mainstreaming, to not just tick the boxes."**
> EUD OFFICIAL

[28] Ibid.
[29] Ibid.
[30] Ibid.
[31] KWN interviews.

Indicator 3.3.2. N# of job descriptions that contain gender equality as an area of responsibility, by seniority

GAP II foresees that the EC, EEAS, and MSs will include furthering gender equality among the responsibilities of officials at all levels by including it within their job descriptions. The Annual Implementation Report 2016 did not contain any information regarding the number of job descriptions that contain gender equality as an area of responsibility in DG NEAR.[30] However, this may be due in part to the fact that job descriptions are created and approved in Brussels.[31]

With one exception, in WB countries, GFPs' job descriptions have not been updated to include their existing GFP responsibilities. Without clearly stated GFP responsibilities, GFPs often had to prioritize other tasks over their GFP work, giving them less time to spend on gender specific issues and tasks. The GAP II Guidance states that "The time devoted by the Gender Focal Person to his/her function has to be duly reflected in the job description to guarantee adequate allocation of working hours to the tasks (at least 40-60% time of a regular working week)".[32] On average, GFPs in WB EUDs estimated that they only spend between 16% and 21% of their time on GFP tasks.

GFPs observed that updating their and other staff members' job descriptions, at all decision-making levels, would contribute to improved attention to furthering gender equality. Integrating responsibilities to promote gender equality within the job descriptions of ambassadors, heads of cooperation, and sector project managers[33] also is essential, so that the responsibility to raise gender equality issues within policy dialogues is clear.[34]

OBJECTIVE 4. ROBUST GENDER EVIDENCE USED TO INFORM ALL EU EXTERNAL SPENDING, PROGRAMMING AND POLICY MAKING

Country	# of programs with gender analysis	Total # of programs	% of programs using gender analysis
Albania	1	N/A	N/A
Bosnia & Herzegovina	32	N/A	N/A
Kosovo	15	15	100%
Macedonia[35]	N/A	N/A	N/A
Montenegro	4	4	100%
Serbia	1	9	11%
Total	53	28	

Indicator 4.1.1. N# of thematic, bilateral and regional programs per year using gender analysis to inform design
The Annual Implementation Report 2016 states that 29 programs in DG NEAR involved gender analysis to inform their design.[36] This included programs from Albania, Bosnia and Herzegovina, Kosovo and Serbia.[37] However, as the total number of programs is unreported, the percentage of all programs that involved gender analysis is unknown. Arguably, a percentage of all programs would be a more accurate indicator than a number for this indicator, as it would better illustrate how many programs have involved gender analysis. The reporting template seems to have identified this shortcoming; a row has been added to identify the percent "against all new programmes formulated in 2016".[38] However, no data is available for DG NEAR or the WB specifically.

As of 2017, overall gender analyses had been conducted in all countries to assist with identifying GAP II objectives and indicators at the country level. However, only some countries had conducted gender analyses that examined particular sectors in detail. The recurring response from EUD project managers was that no gender analysis had been used to inform the design of specific actions. Several noted the lack of gender statistics related to particular sectors.

Indicator 4.1.2. N# of program evaluations per year that include an assessment of impact on women and girls

[32] DG DEVCO, "Guidance note on the EU Gender Action Plan 2016 – 2020 for DEVCO HQ and EUD operational staff", p. 47. While this is for DG DEVCO, presumably DG NEAR has similar guidance.
[33] Throughout this paper, the term "project manager" is used to refer also to task managers and program managers.
[34] See indicator 1.1.2.
[35] EUD representatives reported that gender analysis of IPA I programming projects was undertaken by the IPA Twinning Project on Gender Equality mainstreaming (email correspondence, Dec. 2017). However, the precise number of programs was not provided.
[36] EC, Annual Implementation Report 2016, p. 66.
[37] Ibid, p. 55
[38] Ibid, p. 66.

The Annual Implementation Report 2016 does not state whether any WB country included an assessment of the impact on women and girls in any program evaluations in 2016.

Indicator 4.2.1. Whether internal processes of methodological review are carried out to mainstream gender in quality assurance mechanisms (e.g. for the EC: Quality Support Group, etc.)

While quality review should include gender review, this has not yet been established, though one respondent noted that efforts were being undertaken in this direction.

Country	# ADs revised	Total # of ADs	% of ADs revised
Albania	N/A	N/A	N/A
Bosnia & Herzegovina	N/A	N/A	N/A
Kosovo	15[39]	15	100%
Macedonia[35]	N/A	N/A	N/A
Montenegro	5	N/A	N/A
Serbia	1	9	11%
Total	21	24	

Indicator 4.2.2. N# of new Action Documents (or equivalent) commented and subsequently revised including for poor gender consideration

According to the Annual Implementation Report 2016, there is still "much to be done to mainstream gender analysis into the full planning process and the designing of Action Documents" (ADs).[40] The report's annex seems to state that only five ADs were commented on in DG NEAR. However, KWN's interviews suggest that more than five ADs were reviewed and revised in WB countries. Unlike DG DEVCO, DG NEAR has not contracted assistance to support the screening of all new ADs from a gender perspective. Since DG NEAR does not have a Centre of Thematic Excellence focusing on gender equality that could undertake quality assurance tasks, ostensibly this task perhaps was meant to be carried out by the recently created position of Policy Assistant – Gender Equality within DG NEAR. However, the task of reviewing all new ADs from a gender perspective is too extensive for a single person, considering the tight timeframes for preparing these documents. Moreover, arguably context specific knowledge also would be required to inform any needed revisions. EUD representatives tended not to mention having received comments from DG NEAR on draft ADs in relation to gender equality.

At the delegation level, EUDs have taken different approaches towards better mainstreaming gender within IPA programs. In Kosovo, the EUO has contracted KWN since 2015 to provide expertise and assist in mainstreaming gender in IPA programming (see the Case Study). UN Women in Serbia developed a "Gender mainstreaming in IPA" training, which UN Women in Albania replicated and further developed with support from the Austrian Development Agency.[41] These three different interventions involved working with public servants in different sectors, NGEMs, gender experts and EUD project managers, supporting them in further mainstreaming gender in IPA programming. In Bosnia and Herzegovina, the EUD GFP has reviewed IPA pro-

CASE STUDY:
CONTRACTING WCSOS' EXPERTISE

Contracted by the EUO in Kosovo since 2015, KWN, a local WCSO, has provided technical support to the EUO, Ministry for European Integration, Agency for Gender Equality in the Office of the Prime Minister, and Gender Equality Officers (GEOs) in mainstreaming in gender within IPA programs. As part of its "help-desk" function, KWN also has supported the development of the EUO GAP for 2016-2020 in Kosovo. The added value of contracting a local WCSO is that they often possess local connections, knowledge, language skills, and access to diverse target groups. Moreover, they are efficient and investments are sustained in country. WCSOs are motivated by their missions, continuing to monitor and advocate changes after contracts end.

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[39] Reviewed and commented upon. No information yet as to whether suggested revisions were adopted.
[40] EC, Annual Implementation Report 2016, p. 4.
[41] Email correspondence with EUD official in Albania, Dec. 2017.

grams, mainstreaming gender within them. Similarly, in Macedonia, the GFP with the EUD program manager in the cooperation section have undertaken a gender equality review of IPA ADs. In Montenegro, the EUD contracted an individual foreign expert to facilitate gender mainstreaming. Thus, EUDs have sought to mainstream gender in IPA programming, though their approaches have varied.

Although gender experts proposed revisions to several ADs, not all seem to have been "subsequently revised". Interview respondents identified several contributing factors. First, some project managers had insufficient will, knowledge or understanding regarding the relevance of gender mainstreaming, particularly in sectors mistakenly deemed as "gender-neutral", such as energy or water. Thus, they did not always understand how to mainstream gender in relevant documents. Second and related, officials in Brussels reportedly sometimes undid gender mainstreaming previously carried out at the delegation level, evidently because it involved what they considered to be extraneous detail.[42]

A third challenge commonly noted by project managers is that government counterparts do not always accept proposed revisions. For example, in Kosovo, a project manager had encouraged a line ministry to include a gender perspective in IPA programming documents. However, the ministry did not consider it a priority and ignored EU recommendations. In most WB countries, beneficiary governments should have ownership over IPA programming, and they are responsible for planning programming in line with existing sector strategies. A recurring theme was that this presents a fundamental challenge in implementing GAP II; EUDs can advise governments, but cannot force them to adopt recommendations. EUDs' lack of ownership over ADs contributes to hesitancy among EUD officials in encouraging beneficiaries to address gender inequalities and to incorporate GAP II thematic objectives in programming. However, this suggests that EUDs also tend to treat furthering gender equality as an "optional" fundamental right, rather than as an essential requirement as important as other reforms.

A fourth, underlying institutional challenge to progress on this indicator is that gender is treated primarily and sometimes only within the "cross-cutting" issues section of the AD template. Therefore, gender equality is not mainstreamed throughout the other sections of ADs, such as in the situation analysis, intervention logics, and indicator tables. However, in fall 2017 the DG NEAR Policy Officer for Gender Equality/Gender Adviser took steps to address this, including based on specific recommendations provided by KWN on how gender could be mainstreamed in other sections of the AD. Opportunities exist to amend AD templates to require information pertaining to gender in all AD sections as part of the ongoing reforms to templates related to OPSYS, the new electronic information management system that is currently being designed. Without requirements to include objectives, baselines, and targets informed by gender analysis in ADs, implementers will not be held responsible for reporting on progress towards furthering gender equality. Therefore, installing such requirements within templates is essential for ensuring accountability in achieving results towards gender equality and for subsequent reporting on results.

The fact that no baseline or target is set for this indicator is confusing. At present, an increase in the number of ADs commented on and revised will be positive because it shows that quality assurance mechanisms are in place.[43] However, a potential flaw with this indicator is that in later years, capacity-building ideally should improve gender mainstreaming within ADs. This would lead to a decrease in the number of ADs requiring comments and revision, which also would be positive.

Therefore, perhaps a better indicator for the relevant activity and objective would be whether standardized quality assurance mechanisms are in place, with gender experts reviewing all ADs from a gender perspective. For example, the Austrian Development Agency has a best practice in this regard, ensuring that every AD undergoes review by gender experts, that beneficiaries revise final project documents to address comments by the gender expert before contract signature, and that regular reporting provides updated responses to issues raised by the gender expert.

Indicator 4.3.1. % of programs using findings of consultations with National Gender Equality Mechanisms, CSOs, women's organisations, to inform action design

Overall, the EC Annual Implementation Report 2016 states that there is "some consultation" with NGEMs and CSOs, "also on gender equality issues, even if not formalised". For example, the report notes consultations on

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[42] KWN interviews.
[43] As foreseen in activity 4.2, "Establish quality assurance processes for project documents; and question spending approval wherever gender is not adequately considered".

European Instrument for Democracy and Human Rights (EIDHR) calls for proposals.[44] The examples provided refer to consultations on funding for CSOs. No examples are provided relating to sector-specific programs and consultations organized to hear the perspectives and needs of women and men related to these programs. Nor does the Annual Implementation Report contain clear data for this indicator.

The Report seems to suggest that five EUDs and DG NEAR involved Women's Rights Defenders' organisations "and/or CSO working for women's rights when consulting with civil society". This revised version of this indicator within the Report does not provide sufficient information regarding the extent to which NGEMs, CSOs, and women's organizations, respectively, were consulted to inform ADs. The revised indicator has several problems. First, it broadens substantially the meaning of the indicator to seemingly include any type of consultation held with civil society, not necessarily related to particular programs. Second, the new indicator entirely ignores NGEMs, as crucial government institutions. Third, it confuses the terminology by introducing a new term, women's rights defenders' organisations, to the original indicator that refers only to women's organizations. The two terms are not synonymous. Fourth, to calculate accurately the percentage of programs at country, region, and international levels, a percentage is insufficient; real numbers will be needed.

In WB countries, KWN could not identify the precise percentage of programs informed by findings from consultations with NGEMs, CSOs and women's organizations. This related to the fact that EUDs do not have electronic systems in place for tracking whether such consultations have been organized for specific programs. Specifically related to sector programming (ADs), few EUDs had consulted with NGEMs. In Macedonia and Kosovo, NGEMs reported that ministries and departments responsible for drafting IPA documents deal with these processes and do not consult them.[45] While KWN has sought to involve NGEMs in Kosovo, line ministries have resisted their involvement, not seeing the use or purpose of involving them. In Montenegro, project managers stated that they do not consult with NGEMs, noting that they were unsure about such bodies, though the GFP stated that the NGEM is part of the process, mostly related to human and minority rights. In Bosnia and Herzegovina, the NGEM at the national level reportedly is involved, though the NGEM in Banja Luka had reviewed only a few IPA documents. Due to government reshuffling, Albania has not had any NGEMs in place. In Serbia, the NGEM stated that they collaborated closely with UN Women in organizing the gender mainstreaming of ADs.

Regarding consultations with civil society on programming, WB countries have different experiences. Montenegro has systemized CSO participation, whereby CSOs applied and the government selected the ostensibly most experienced CSOs in certain sectors to participate regularly in sector working groups. However, no WCSOs have been involved, particularly given the lack of understanding that gender should be mainstreamed within sectors. Similarly, in Macedonia, Sector Working Groups have invited CSOs, including CSOs focusing on gender equality, for consultations on IPA programs, though the process reportedly "has not worked particularly smoothly" as working groups have not met systematically

> **"There are consultations organized with WCSOs and NGEMs but sometimes I feel like they have no clue what they are talking about. They just come with their usual points. It's always the usual suspects."**
> EUD OFFICIAL

Country	NGEMs consulted	CSOs consulted	WCSOs consulted
Key: ~ = somewhat;	√ = yes	x = no	
Albania	x	x	x
Bosnia & Herzegovina	~	x	x
Kosovo	x	x	~
Macedonia	x	x	x
Montenegro	~	√	x
Serbia	~	~	x

[44] P. 12.
[45] KWN interviews.

and CSOs have not been invited to every meeting.[46]

Across all WB countries, WCSOs stated that they had little if any information about the EU Accession process; nor had they participated in any discussions to inform the planning of specific EU programs. None of the 38 WCSOs interviewed recalled being consulted on specific programs. The only exception was KWN who has been involved in reviewing and commenting on all ADs for the EUO in Kosovo.

EUDs provided several reasons as to why they did not organize such consultations. First, some EUD officials repeated the aforementioned statement that beneficiary governments should take ownership and responsibility for organizing public consultations, not the EUD. Moreover, EUD officials noted the fact that ADs should derive directly from Sector Planning Documents, which should be based on existing state strategies that have involved prior public consultations. In other words, governments should have already undertaken public consultations related to programs. Therefore, they stated, this should not be the responsibility of the EUD. WCSOs and most NGEMs noted that public consultation processes on government strategies had tended to lack proper public consultation. An EU official also noted that "numerous national strategies lack gender responsiveness and gender-sensitivity, gender indicators, etc." The official noted that such shortcomings were the responsibility of national actors and not the EUD. Such reasoning obscures the role and responsibility of the EUD in encouraging government beneficiaries to address shortcomings, as among the fundamental rights important to EU accession, and particularly for programs funded by the EU. EUDs have the power to strongly encourage governments to improve upon shortcomings in furthering gender equality, including by requiring governments to consult with NGEMs, CSOs and WCSOs, respectively, during processes of planning EU-funded programs. Indeed, encouraging the government to organize such consultations arguably would be within the spirit of this GAP II indicator.

Second, EUD and government officials said that the short timeframes for preparing programs, particularly ADs, precluded organizing public consultations. A third recurring theme among EUD representatives, particularly in Albania and Serbia, was that NGEMs and WCSOs lack capacities, human resources, experience and knowledge for contributing useful input to inform programmatic designs.[47] On the other hand, NGEMs and WCSOs stated that there is a lack of initiative shown by the EUD to consult them, especially related to IPA programming, implementation and evaluation.[48]

In conclusion, evidence gathered through this evaluation suggests that EUDs have not consulted sufficiently or systematically with NGEMs, CSOs and women's organizations to gather their input on policy changes or the design of IPA programs.

OBJECTIVE 5. RESULTS FOR WOMEN AND GIRLS MEASURED AND RESOURCES ALLOCATED TO SYSTEMATICALLY TRACK PROGRESS

Indicator 5.1.1. Status of results monitoring on gender sensitive indicators

In 2015, the EC adopted its first Results Framework (EURF).[49] The EURF mentions gender 16 times and contains three indicators relevant to furthering gender equality, as well as indicators specific to women. These include:

1) The proportion of seats held by women in national parliaments (aligned with UN SDG indicator 5.5)
2) Percentage of women aged 20-24 years old who were married before their 15th/18th birthday (SDG 5.3)
3) Proportion of EU funded cooperation and development initiatives promoting gender equality and women's empowerment
4) Number of women using any method of contraception with EU support[50]

Women are mentioned within other SDG indicators that correspond with the EURF indicators. However, EURF indicators do not actually request sex-disaggregated data explicitly, with one exception.[51] Since the EURF was

[46] EUD representative (correspondence, Dec. 2017.
[47] KWN interviews.
[48] Notably, only one WCSO was consulted in the External Evaluation of IPA programming (see Farnsworth and Banjska, 2017).
[49] Commission Staff Working Document, "Launching the EU International Cooperation and Development Results Framework", SWD (2015) 80 final, Brussels: 26 March 2015, at: https://ec.europa.eu/europeaid/sites/devco/files/swd-2015-80-f1-staff-working-paper-v3-p1-805238_en_0.pdf.
[50] See, pp. 21, 29, and 26, respectively.

adopted several months before GAP II, it does not contain several GAP II indicators.

Thus, GAP II set a milestone that by the end of 2016, if needed, corporate results frameworks will be revised to include "gender sensitive indicators and indication of sex disaggregation that is aligned with SDGs indicators".[52] The second foreseen milestone was that by the end of 2016, "all results gathered in addition to those included in corporate results frameworks are sex-disaggregated where relevant".

While the Annual Implementation Report 2016 contains information pertaining to this GAP II indicator from MSs' Results Frameworks, it does not report on the EC's progress. The EURF has not been updated yet, but seemingly this has been planned for 2017.[53] Meanwhile, the EURF is mentioned within the Annual Implementation Report 2016 related to several GAP II indicators.[54] However, again, many indicators do not clearly request data disaggregated by age or sex (see Annex 4). The fact that a Gender Action Plan does not require sex-disaggregated data for several indicators is very problematic. Moreover, it likely will contribute to inaccurate reporting on GAP II in future years as EUDs may only report overall numbers rather than data disaggregated by sex. It cannot be assumed that officials in EUDs, beneficiary countries and contractors will report sex-disaggregated data at their own initiative without being required to do so. Sex-disaggregated data for every GAP II indicator needs to be required.

Indicator 5.1.2. % of results disaggregated where relevant by sex in Results Framework(s)

Related, since the EURF has not been updated yet, there has not been an increase in the percentage of results disaggregated by sex.

Indicator 5.1.3. Status of SWD indicators as compared to the SDGs

While the Annual Implementation Report 2016 does not state so explicitly, GAP II indicators have been revised in comparison to SDG indicators. SDG indicators are referenced regularly in Annex 2 of the Annual Implementation Report 2016, as such indicators correspond with GAP II indicators.

Indicator 5.3.1. N# of justifications for OECD Marker G0 scores

The OECD Development Assistance Committee (DAC) Gender Marker is "a marker which attributes a score to projects based on how significant its gender dimension is".[55] Each project should receive a Gender Marker, using the EU's electronic data management system: the Common External Relations Information System (CRIS). Projects that primarily seek to contribute to gender equality and women's empowerment at an overall objective level receive a Gender Marker score of G2. Projects that significantly aim at promoting gender equality and/or women's empowerment receive a score of G1. Projects that have "no inherent potential to impact on gender equality" receive a score of G0. This GAP II indicator requests that all projects marked G0 include a justification for this score.

The Annual Implementation Report 2016 states that four MS programs reported justifications for OECD Marker G0 in 2016.[56] However, data from EUDs was lacking. A challenge noted by GFPs in WB countries is that CRIS allows persons entering data to bypass the Gender Marker by leaving the marker in its default position of G0. One can proceed to the next screen in CRIS without being required to provide any justification for a G0 score. Since the question often was bypassed during data entry, rarely were any justifications provided.

Indicator 5.3.2. % of new programs that score G1 or G2

Building on the aims of GAP I, GAP II sets an ambitious target that 85% of all new programs will receive a Gender Marker score of G1 or G2 by 2020. The baseline was an average of 47% across all EU programs in 2015.[57]

[51] Indicator 8: "Number of women and men who have secure tenure of land with EU support" (p. 24).
[52] Council Conclusions, p. 14.
[53] See: capacity4dev.eu, "EU Results Framework Indicators", at: https://europa.eu/capacity4dev/eu-rfi, accessed 27 Nov. 2017, which states "The EU Results Framework will be reviewed in the course of 2017 in order to reflect the Sustainable Development Goals and the new EU development priorities as put forward in the recently approved new European Consensus on Development."
[54] See Annex 2, Table 5.
[55] Council Conclusions, p. 12. For further information, see: OECD DAC policy marker for gender equality and women empowerment, at: http://www.oecd.org/dac/gender-development/dac-gender-equality-marker.htm.
[56] Annual Implementation Report 2016, p. 70.
[57] Ibid, p. 5.

In 2016, the EC reported that the percentage of all programs with G1 or G2 scores increased to 57.75%. More specifically, 56.6% (47 out of 83) of new programs marked by DG NEAR "mainly or significantly" aim at "promoting gender equality and/or women empowerment" (G1 or G2).[58] Thus, 43.4% of new DG NEAR actions received a G0 marking. This suggests improvement compared to 2015 when DG NEAR classified 75% of committed funds as G0, 22% as G1 and 3% as G2.[59] The EC heralded the increased use of G1 and G2 as a sign that more programs having gender equality and women's empowerment as main objectives.

DG NEAR [60]	Commitment 2016 (in EUR)	% of total commit-ment 2016	Disbursement 2016 (in EUR)	% of total disbursement 2016
G0	1,655,450	36,00	1,906,797	62,72
G1	2,871,925	62,42	1,076,457	35,41
G2	72,250	1,57	56,911	1,87
Total	4,600,625		3,040,166	

In terms of committed funding, as the table illustrates, DG NEAR increased from 25% of committed funds having a mark of G1 (22%) or G2 (3%) in 2015, to 64% of funds in 2016 (62% G1, 2% G2). Regarding disbursements, DG NEAR increased from 18% of disbursed funds receiving a G1 or G2 mark (16% G1, 2% G2) to 37% in 2016 (35% G1, 2% G2). Information specific to individual countries in the WB were not provided, and some EUD officials noted that the data available was unreliable.

Some respondents within EUDs stated that the Gender Marker was merely a "box ticking" or "academic exercise" that "won't represent the real impact in reality". They did not see the purpose of using the Gender Marker. Another recurring reason provided for seldom using the Gender Marker was that project managers lacked information regarding the meaning of the Gender Marker and how to use it. They did not feel that they had the required expertise to evaluate programs from a gender perspective. Difficulties affiliated with marking infra-structure and other sectoral programs that did not include a "social aspect" regularly were mentioned. A GFP mentioned the subjectivity affiliated with the Gender Marker, noting that it "feels artificial" and that "it depends too much on personal assessment".[62] In Serbia respondents said that the encoding system would soon change (to OPSYS), so they did not see the purpose of encoding such information into the old system (CRIS) now.

Thus, use of the Gender Marker has involved several shortcomings. First, the initial guidance provided and lang-uage used, focusing on significant (G1) or overall (G2) objectives, has hindered several project managers from using the Gender Marker because they interpreted it as unrelated to their work. This is because AD templates specifically instruct that programs have only one overall objective and ideally only one specific objective. From the perspective of the terminology of logical frameworks, it is difficult for project managers to justify including an additional specific or overall objective towards gender equality within ADs that focus on developing infrastructure or renewable energy, for example. While they could mainstream gender in activities, expected results, and/or project management, at face value the language of "objectives" used by the Gender Marker suggests that such mainstreaming still would not receive a G1 or G2 score. Thus, the initial explanatory language of the Gender Marker potentially confused encoders as it seemed inapplicable. Problematically, the Annual Implementation Report 2016 often uses the term "gender mainstreaming" in 85% of programs interchangeably with the target to "mark" 85% of projects G1 or G2; this is confusing because projects can be gender mainstreamed without managing to meet the initial criteria for receiving a G1 mark. In December 2016, the OECD published a Handbook on the OECD-DAC Gender Equality Policy Marker with guidance that sought to clarify this issue.[63] However, the Handbook still uses the language of objectives, which likely will continue causing confusion among project managers and state beneficiaries.

Second and related, insufficient knowledge and awareness likely has contributed to misreporting on the Gender Marker. To date, use of the marker primarily has involved subjective interpretation. While the new

[58] Ibid, p. 4.
[59] Ibid, p. 102.
[60] Ibid, p. 7. Amounts rounded to the nearest Euro by KWN.
[61] Officials noted that the data available is quite unreliable at present (email correspondence, Dec. 2017).
[62] KWN interview.
[63] OECD-DAC Network on Gender Equality (GENDERNET), "Handbook on the OECD-DAC Gender Equality Policy Marker", at: https://www.oecd.org/dac/gender-development/Handbook-OECD-DAC-Gender-Equality-Policy-Marker.pdf. See pp. 10-11.

Handbook has sought to clarify the meaning of each score, the fact that few project managers have received or read it means that marking probably remains subjective. Moreover, the Handbook is rather long and requires some basic knowledge and expertise in gender mainstreaming, which few persons encoding data have. This contributes to inaccurate data, unusable for measuring accurately progress on GAP II.

Third, the aforementioned challenge that beneficiary governments draft most ADs, not the EUD, remains a persisting obstacle for EUDs to ensure that governments mainstream gender within programs. While EUDs can apply political pressure, they rely on beneficiary countries to accept their proposals.

Fourth, a technical problem with the Gender Marker is that when programs are encoded as G1 or G2, their overall amount tends to be considered as contributing
to gender equality. This can be misleading, particularly for programs marked G1, which may allocate only a portion of the overall expenditures to gender equality. Thus, the overall amount reportedly contributed to furthering gender equality may be inaccurate.

OBJECTIVE 6. PARTNERSHIPS FOSTERED BETWEEN EU AND STAKEHOLDERS TO BUILD NATIONAL CAPACITY FOR GENDER EQUALITY

Overall, EUDs have taken very few initiatives to foster partnerships between the EU and stakeholders to build national capacities for gender equality, as illustrated by the minimal progress made on the following indicators. Notably, GAP II has not foreseen initiatives to partner with or support the capacity development of WCSOs as key stakeholders in furthering national capacities for gender equality, which arguably represents a shortcoming of GAP II.

Indicator 6.1.1. N# of research projects co-financed by EU (EUD/MS) on gender related issues

Indicator 6.1.2. N# of programs reporting improvement in quality and availability of sex-disaggregated/ gender specific statistics through EU support

These indicators align with the foreseen GAP II activity to: "6.1. Support the research and independent analysis capacity of national statistics institutes, academia and CSOs, including macro-economic analysis, gender responsive budgeting and gender stereotypes". The lack of accurate data, including for baselines for measuring progress on GAP II indicators, was a recurring problem noted in interviews. Thus, several opportunities exist for EUDs to support development of research capacities in WB countries. However, besides the Gender Analyses required by the GAP II, EUDs did not have many examples of research that they had funded related to gender equality. Possibilities exist that other EU funding mechanisms and MSs, particularly Sweden, may have financed research in WB countries, though examining these contributions was beyond the scope of this evaluation.

Given the few known EU co-financed research projects focusing on gender equality, understandably few improvements on the quality and availability of data were reported. This also relates to the fact that it was still early to report on program results deriving from investments brought about by GAP II. An exception was Serbia, which became the first non-EU country to produce the EU Gender Equality Index.[65] While other countries took steps in this direction, they did not complete the index, thereby making such data more available.

Country	Coordination Mechanism?
Albania	No
Bosnia & Herzegovina	Yes
Kosovo	Yes
Macedonia	Yes
Montenegro	Yes
Serbia	Yes
Total	5

Indicator 6.2.1. N# of partner countries with gender coordination mechanisms that include (international) actors working locally

According to the Annual Implementation Report 2016, 13 DG NEAR countries have gender coordination mechanisms in place, though their locations are not listed.[66] Interviews suggest that no such bodies exist in Albania. In Bosnia and Herzegovina, EUD representatives and the GFP in the Ministry of European Integration mentioned a coordination body that supposedly monitors implementation of GAP II; the EUD has encoura-

[64] EC, Annual Implementation Report 2016, p. 57. This table only includes EUDs and not MSs.
[65] Ibid, p. 58. Sweden financed improved data in Albania, Serbia and Kosovo; Austria offered support in Albania.
[66] Ibid, p. 59.

ged the NGEM to lead this bod. In Montenegro, the Gender Equality Department within the Ministry of Human and Minority Rights is responsible for all coordination pertaining to gender equality, including with gender focal points in ministries and municipalities. Additionally, the Parliamentary Committee on Gender Equality for Policy Coordination and the National Council for Gender Equality involve members from civil society as well as public officials. However, civil society representatives said that in practice these mechanisms rarely met. In Macedonia, an intersectional coordination body works on gender equality issues with representatives from all ministries, civil society and social partners.[67] In Kosovo, the Agency for Gender Equality together with the Ministry for European Integration, officially responsible for donor coordination, began coordinating work related to gender equality, organizing one meeting in early 2017.

Altogether, while gender coordination mechanisms theoretically exist in most countries, interviews suggested that qualitatively they did not always function well. Mechanisms tended to involve more ad-hoc rather than systematic meetings and consultations. Sub-group meetings related to specific issues sometimes functioned better.

Country	Program for NGEMs	# of Sectors Involving NGEM
Albania	Yes	1[68]
Bosnia & Herzegovina	No	1
Kosovo	Yes	0?
Macedonia	No	0?
Montenegro	Yes	0
Serbia	Yes	1
Total	4	3

Indicators 6.3.1. N# of programs for NGEM supported by EU and 6.3.2. N# of sector programmes working with the NGEM

These indicators measure the extent to which EUDs support NGEMs in furthering their capacities and involve NGEMs in programming, respectively. The Annual Implementation Report 2016 states that EUDs are supporting programs for NGEMs in Albania, Kosovo and Serbia.[69] Moreover, MSs in WB countries reported supporting NGEMs in Albania (Sweden) and Kosovo (Sweden and Germany). The report also states that NGEMs have been involved in a sector program in Albania with EU support. Meanwhile, Sweden has supported a sector program that works with NGEMs in Serbia.

Country	Media
Albania	0
Bosnia & Herzegovina	3
Kosovo	0
Macedonia	0
Montenegro	0
Serbia	1
Total	4

Indicator 6.4.1. N# of projects building awareness of local and national media on gender issues in partner countries and supported by EU

According to the Annual Implementation Report 2016, 10 EUDs in Europe and Central Asia are supporting media awareness on gender issues, though country names are not listed. EUD representatives generally suggested that too little is done when it comes to working with media on gender related issues. Since GAP II entered into force, EUDs seem not to have invested in building local media's capacity to report qualitatively on gender related issues or to raise local gender equality issues. An exceptional, clear example of how to engage media in raising awareness on gender issues while building their capacity to do so was found in Serbia; an EIDHR-financed project in Vojvodina trained media on gender issues and then had them report on relevant subjects. The GFP suggested that other cities in Serbia could duplicate this successful initiative.

OBJECTIVE 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 LAW

Indicator 18.1. N# of women Human Rights Defenders who have received EU Support (EURF)
Under the GAP II Thematic Priority related to political and civil rights: Voice and Participation, the goal is that the "EU will continue to contribute in a measurable manner to an increase in girls' and women's agency, voice and participation in social, economic, political and civil life". While generally, this evaluation did not examine GAP II Thematic Priorities,

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[67] KWN interview with NGEM in Macedonia.
[68] EC, Annual Implementation Report 2016, p. 61.
[69] Ibid, p. 60.

one indicator from Objective 18 has been included as an exception given the important interrelationship between this indicator and the realization of several other indicators in GAP II under Institutional Cultural Shift. Namely, a foreseen activity contributing to achieving Objective 18 is to "support the participation of women's organisations as accountability agents in budgetary, legislative, and policy making processes at all levels", contributing to indicator 18.1.

While this indicator relates to the EURF, it arguably is a poor measure of support to the participation of WCSOs because it focuses on women Human Rights Defenders. The focus on individuals rather than organizations or movements individualizes women's rights activism, ignoring important enabling environments and foundations on which such activism is built. A focus on individual women fails to measure accurately the achievement of the objective, as it does not measure support to women's organizations or other CSOs working on furthering gender equality and women's empowerment. Further, measuring the number of women human rights defenders supported by the EU methodologically poses several challenges.

The Annual Implementation Report 2016 notes that only two EUDs in all of Europe and Central Asia said that they planned to support women's human rights defenders as part of their efforts to implement GAP II.[70] Neither was from the WB. However, Kosovo proposed a new, proxy indicator: "number of CSOs working to further gender equality, supported by the EU".

Aside from the general aforementioned methodological challenges affiliated with this indicator, insufficient resourcing for WCSOs can hinder their ability to participate in EU Accession processes, including in consultations and advocacy work related to gender equality as outlined in other parts of GAP II. WCSOs are key partners for EUDs in ensuring gender is mainstreamed in the fundamentals first approach; ensuring gender focus in political dialogue; and ensuring gender mainstreaming and gender expertise related to EU financial support to beneficiary countries. In order to support EUDs in implementing GAP II objectives in these areas, WCSOs need resources, primarily human resources, which ties to this objective. Being "freely able to work" links to having sufficient resources to work, which is insufficiently measured by this indicator.

Meanwhile, WCSOs throughout the region reported resource shortages that hampered their work and limited the amount of time they could spend monitoring and advocating for gender equality in relation to EU Accession processes. Moreover, WCSOs in several WB countries have experienced shrinking space.[71] In oppressive political environments, political support from EUDs (GAP II, Objective 1) in defending the rights of WCSOs to operate, as well as the issues raised by WCSOs is a crucial form of support as well.

ADDITIONAL ISSUES AND LESSONS LEARNED FOR GAP III

While not related to a specific objective and indicator within GAP II, the evaluation process revealed several additional issues. First, GAP III ideally should be programmed to build on GAP II and correspond with other programming. Given the timeframe of programming cycles, it will take time for the impact of GAP II in relation to thematic priorities to be seen. Second, in GAP II, EUDs should mainstream gender in programs, but most programs are developed by beneficiary states, as mentioned. GAP III will need to address more clearly the issue of the EUDs' roles and responsibilities to further a gender equality agenda in such environments like the WB. Third, several indicators in GAP II, while not elaborated in this paper, are problematic and require revision.[72] Fourth and related, while GAP II sets indicators, very few have baselines or targets. This makes it difficult to measure progress over time. Moreover, the absence of specific targets hinders EU actors' accountability in delivering on results.

Fifth and more broadly, for a gender action plan, GAP II pays astonishingly little attention to men, boys, and gender relations. Experience in the WB suggests that framing gender equality solely with respect to women can lead to misunderstandings regarding what gender equality entails and resistence from men, undermining efforts to further gender equality.

[70] Ibid, p. 17, 88.
[71] See, the Kvinna till Kvinna Foundation, "Building resilience – counteracting the shrinking space for women's rights", 2017.
[72] See Annex 4.

RECOMMENDATIONS

FOR THE EUROPEAN EXTERNAL ACTION SERVICES

• Appoint more women as EU Heads of Missions when openings exist (Objective 2).

• Undertake gender analysis to inform engagement in political dialogues, ensuring that relevant issues pertaining to gender equality are adequately incorporated in all political discussions. In order to inform gender analyses, meet regularly with WCSOs to gather timely, relevant information about priority gender equality issues in the country and region.

• Ensure meetings with WCSOs take place during regular working hours, respecting women's rights activists' time, as well as with media coverage, where relevant. This will provide important political support to WCSOs by evidencing to government officials that the EU considers dialogue with WCSOs important and furthering gender equality a political priority.

FOR THE EUROPEAN COMMISSION

• Brief all Heads of Delegations and political officials on their responsibilities under GAP II, including the importance of raising issues related to gender equality within political dialogues. Collaborate with EEAS to prepare guidelines, including sector specific guidance, on the importance of gender mainstreaming in political dialogues and how this can be done, for dissemination both at HQ and EUDs. Encourage Heads of Delegations to lead by example. Consider ensuring that at least one political adviser in every EUD has gender expertise and is positioned to advise Heads of Delegations regularly on how to integrate a gender perspective within diverse political dialogues (Objective 1).

• DG DEVCO, as responsible for GAP II, should review indicators and data sources for improved accuracy, including on "dedicated funding" for women and girls, and WCSOs (Objective 3).

• Improve electronic data management systems, including requiring reporting on dedicated funding for women and girls within the new OPSYS (Objective 3).

• Ensure that all EUD staff at all levels complete obligatory training on gender equality, including practical skills training on gender mainstreaming related to their particular roles and responsibilities. With DG Human Resources, consider creating a mandatory, interactive online e-training software that could be rolled out across delegations and required of all officials (Objective 3). The e-training should be practical rather than theoretical with specific examples from ADs from different sectors. It should provide several practical exercises related to gender mainstreaming in programming. It should be supplemented by coaching tailored to EU staff responsibilities, provided by the Gender Focal Point and contracted experts, as relevant. Improve systems for tracking training provided, such as through the EU Learn training system.

• Allocate adequate, dedicated human resources for implementing GAP II, including gender experts both in Brussels and EUDs (Objective 3).

• Urgently update job descriptions at all levels to include gender equality responsibilities as relevant to all positions. Ensure that GFPs have sufficient time amid other responsibilities for carrying out their GFP responsibilities (Objective 3).

• Ensure that gender is mainstreamed into all training (Objective 3).

• Ensure that gender is mainstreamed within all templates related to programming, quality assurance mechanisms, evaluations, and internal processes of methodological review (Objective 4).

• Amend Sector Planning Document and AD templates to require gender analysis, gender equality related objectives and/or results, gender-specific baselines, and targets informed by gender analyses. This includes sex-disaggregated data where applicable (Objective 4).

• Establish a standardized process of gender quality assurance with gender experts reviewing all ADs from a gender perspective, potentially based on best practices of the Austrian Development Agency (Objective 4). Consider revising indicator 4.2.2. to reflect the establishment of this institutionalized process.

• Require and ensure that better quality information is gathered and reported regarding the percentage of programs for which EUDs use findings arising from consultations with NGEMs, CSOs, and WCSOs to inform action design, as per the originally foreseen indicator (Objective 4).

• Ensure that planned revisions to the EURF involve including indicators from GAP II among the EURF indicators for regular reporting (Objective 5). Meanwhile, closely review and revise GAP II indicators to ensure that they explicitly require sex-disaggregated data to be reported.

• In designing OPSYS and any other data entry systems used by EUDs, ensure that properly completing information related to the OECD/DAC Gender Marker is obligatory, including required justifications for scores of G0 (Objective 5). Consider including a short, clearer guidance on the meaning of each score to facilitate more accurate, objective reporting.

• Require and ensure that better quality information is gathered and reported in OPSYS and any other data entry systems used by EUDs, regarding the actual financial support provided to women and girls; WCSOs; and NGEMs, either through dedicated programs or as part of gender mainstreaming in sector programs.

• Require measurement and annual reporting on: 1) financial support provided to WCSOs, and 2) to other CSOs, working for gender equality and women's and girls' empowerment and rights, respectively (Objective 18).

FOR EU DELEGATIONS
• Overall, each EUD should develop an action plan, specifying prioritized GAP II objectives and foreseen actions that different parts of the organisation will take to realize these objectives (e.g. related to communications, political sections, and operations) with clear timeframes and responsible persons for each.

• Regularly raise issues related to gender equality within political dialogues. Request assistance from GFPs and political advisers in preparing briefs to inform political dialogues containing gender analysis and recommendations (Objective 1). As recommended in the evaluation report, "emphasise the importance of integrating gender issues into Sector Dialogues, such as, on Public Finance Management, Public Administration Reform, Trade, Energy, Agriculture, Transport and Infrastructure".[73]

• Appoint gender champions, particularly men, who will take the responsibility to continuously promote issues pertaining to gender equality at the country level (Objective 2).

• Heads of Missions need to set an example in their leadership regarding the importance of furthering gender equality by regularly discussing gender equality and emphasizing that EUD staff should encourage beneficiary governments to further gender equality (Objective 2).

• Design systems of reward to better recognize delivery of results on gender equality (Objective 2).

• Regularly review and update as needed country plans for reporting on GAP II objectives, particularly based on new needs identified through gender analyses and regular consultations with WCSOs (Objective 2). Undertake an annual internal review to assess the EUD's progress implementing the country plan, including progress on all GAP II priorities, objectives and indicators.

• Ensure that all actions include gender analyses. If sectors lack specific data, require governments to plan and budget for actions to involve conducting gender analyses as part of inception phases to inform and better mainstre-

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[73] EC, Annual Implementation Report 2016, p. 49.

budget for actions to involve conducting gender analyses as part of inception phases to inform and better mainstream gender within interventions (Objective 4).

• Put in place processes for ensuring that all ADs are reviewed from a gender perspective by gender experts with thorough knowledge and understanding of the local context, ensuring that gender is mainstreamed within all ADs (Objective 4).

• Although final ownership over programming lies with beneficiary countries, EUDs must apply more political pressure related to furthering gender equality as a fundamental right and EU principle, sending a clear message to governments that gender equality is a priority for the EU and should be for governments as well (Objective 4).

• Similarly, EUDs have a responsibility to ensure that beneficiary countries have undertaken sufficient consultations with NGEMs and CSOs, particularly WCSOs, during the processes of drafting new strategies, laws and ADs. If insufficient evidence of such consultations exists, in accordance with GAP II, the EUD should strongly encourage, support, and ensure that the beneficiary government organizes such consultations (Objective 4). This includes ensuring that consultations are meaningful and adjustments are made to ADs based on relevant input from NGEMs and WCSOs, as needed.

• Ensure all EUD employees involved in encoding program data into e-management software are familiar with the OECD Gender Marker and its use, providing detailed justifications when programs are marked G0 (Objective 5).

• Improve data availability by allocating more resources to research and statistics related to gender equality issues, thereby furthering implementation of GAP II (Objective 6).

• Strongly encourage and support local NGEMs in organizing systematic gender coordination meetings that involve both local and international stakeholders towards improved harmonization and alignment, enhancing effectiveness and efficiency in achieving results towards gender equality (Objective 6).

• Allocate financial support to NGEMs towards furthering their capacities to engage in countries' EU accession processes. Strongly encourage countries to ensure inclusion of NGEMs in planning, implementation, monitoring and evaluating in specific sector programs (Objective 6).

• Allocate financial support to improve media awareness and reporting on themes related to gender equality (Objective 6).

• Earmark funds to support WCSOs, including women human rights defenders, particularly related to GAP II implementation and EU Accession processes (Objective 18).[74]

REGARDING GAP III

• Review closely and revise indicators, including ensuring sex-disaggregated indicators. Set targets.

• Address explicitly the issue of ownership over ADs and how specifically EUDs can further gender equality in programming.

• Seek to harmonize GAP III with programming cycles.

• Include as an indicator support to WCSOs as key stakeholders in furthering gender equality as part of the foreseen activities and indicators of GAP III.

• Include more attention to men, boys and gender relations.

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[74] For detailed recommendations, see KWN, "EU Funding for Women's Organisations in the WB: Challenges and Opportunities", 2017, at: http://www.womensnetwork.org/documents/20171201123609298.pdf.

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ANNEX 1. OVERVIEW OF IMPLEMENTATION BY INDICATOR

The following table was taken directly from the European Council's Conclusions on GAP II, Annex 2. Summary of Findings: Culture Shift in EU External Relations Framework. KWN added the last column to summarize findings regarding progress on GAP II implementation in 2016. For indicators that KWN did not examine, the reason as to why is provided in italics.

OBJECTIVES	ACTIVITIES	INDICATORS	ACTORS	FINDINGS
1. Increased coherence and coordination amongst EU institutions and with Member States.	1.1. At international, political, and bilateral level, develop common EU positions highlighting gender and human rights dimensions.	1.1.1. Annually, N# of EU positions for key international agendas that included a focus on gender equality, and the rights of girls and women	EEAS	*Not examined: beyond scope of WB alone*
		1.1.2. N# of political/ policy dialogues between EU actors and partners in the country that raise gender equality issues per year and at country level	Commission services (EC), EEAS, MS	*Very few*
	1.2. EU policies on cross border issues to consider their potential impact on gender equality in partner countries.	1.2.1. Status of the European Strategy for Equal Opportunities between Women and Men 2010 - 2015 (Milestone 1 Strategy adopted; Milestone 2 Strategy implemented)	EC	*Not examined: beyond scope of WB*
	1.3. Member States to endorse measures for "Gender Equality and Women's Empowerment: Transforming the Lives of Girls and Women through EU External Relations 2016-2020" (SWD) and commit to supporting the achievement of identified priorities.	1.3.1. N# of Member States programmes that support the achievement of the priorities identified in the SWD	EC, MS	*Not examined: limited focus as interviewing MS in all countries required more resources than available. Limited info collected from EUDs.*
	1.4. EU institutions and Member States to apply the principle of burden sharing for the implementation of the objectives of the SWD, and ensure coherence with the Human Rights country strategies.	1.4.1. N# of partner countries where EUDs and MS have agreed on context specific measures from the SWD	EC, MS	*Not examined: see 1.3.1.*
		1.4.2. N# of partner countries with gender donor coordination mechanisms led by the EU on donor side.	EC, MS	*Not examined: see 1.3.1.*
		1.4.3. N# of Human Rights country strategies that include gender equality as an objective	EEAS	*Not examined: see 1.3.1.*

OBJECTIVES	ACTIVITIES	INDICATORS	ACTORS	FINDINGS
2. Dedicated leadership on gender equality and girls' and women's empowerment established in EU institutions and Member States.	2.1. Identify political and management level champions from amongst relevant EU actors.	2.1.1. N# of senior gender champions appointed at HQ and country level 2.1.2. Whether a mechanism is established to consult external senior expertise on strategic and ad-hoc issues in relation to gender equality (e.g. advisory board)	EC, EEAS	*Survey unavailable, but qualitative interviews suggest mixed results based on personality. Weak performance often noted.*
	2.2. Improve the participation of women in decision-making positions within the EU.	2.2.1. Ratio of women as EU Heads of Missions (Baseline 2014: 24%)		
	2.3. Develop incentives for managers to improve transparency and to ensure delivery of results on gender equality, including through resource and staff allocation, systems of reward and redress and minimum standards.[75]	2.3.1. N# of good practices highlighted in Institutional Annual Reports. 2.3.2. N# of corrective actions taken per year to improve performance on gender equality 2.3.3. Perception by EU staff of management performance on gender (Source: annual survey)		
		2.3.4. N# of rewards or equivalents handed out to management / programme staff as per agreed criteria	EC, EEAS, MS	*0 in EUDs*
		2.3.5. Findings of final independent evaluation of EU leadership on gender equality	EC, EEAS, MS	*Not yet applicable in year 1.*
	2.4. Management to review and report results on gender equality and girls and women's empowerment and set new ambitious objectives.	2.4.1. Whether corporate reporting systems include a clear assessment of performance on the SWD objectives as a requirement	EC, EEAS, MS	*Not yet.*
		2.4.2. N# of spot checks evaluating performance on gender equality per year	EC, EEAS, MS	*Not examined: due to data availability.*
		2.4.3. Findings of independent evaluation of quality and reach of EU results for women and girls	EC, EEAS, MS	*Not applicable.*
		2.4.4. N# of SWD objectives EUDs and MSs select to report against at country level	EC, EEAS, MS	*45*

[76] The DG NEAR 2016 Annual Activity Report mentions gender only in reference to gender balance in middle management (at: https://ec.europa.eu/info/sites/info/files/file_import/aar-near-2016_en_0.pdf. Other potentially relevant reports could not be found online.
[75] The minimum standards of performance are: OECD/DAC Gender Marker 0 (a marker which attributes a score to projects based on how significant its gender dimension is) is always justified; there is a gender analysis done for all priority sectors (by end 2016); sex-disaggregated data is used throughout the project and programme cycle and programming; gender expertise is available and used timely in the programme cycle and programming; SWD objectives are selected to be reported on.

OBJECTIVES	ACTIVITIES	INDICATORS	ACTORS	FINDINGS
3. Sufficient resources allocated by EU institutions and Member States to deliver on EU gender policy commitments.	3.1. The EU Mid Term Review 2017 of the financing instruments and reviews of multi-annual programming documents (or equivalent for others) work out how results for girls and women of all ages can be improved.	3.1.1. Change (increase or decrease) in dedicated funding to improving results for girls and women after reviews and 2017 MTR (or equivalent)	EC, MS	*MTR in WB did not examine funding to improve results for girls and women. Data unavailable.*
	3.2. EU staff in relevant positions (including Heads of Missions) receive training on gender equality.	3.2.1. N# of staff, disaggregated by level, trained on gender equality per year, and reporting changes in the way that they work.	EC, EEAS, MS	*Data unavailable.*
		3.2.2. N# of gender focal persons (or equivalent) trained per year.	EC, EEAS, MS	*6*
		3.2.3. Gender mainstreamed into all training provided[77]	EC, EEAS, MS	*Not yet.*
	3.3. Job descriptions include responsibilities and tasks for the promotion of gender equality.	3.3.1. N# of Gender Focal Persons (or equivalent) who have 3 years of gender expertise and/or more than 5 years of technical experience in a related field	EC, EEAS, MS	*5*
		3.3.2. N# of job descriptions that contain gender equality as an area of responsibility, by seniority	EC, EEAS, MS	*0*
		3.3.3. Gender point included in performance assessment systems for relevant staff (Management, Heads of Mission, Gender Focal Points etc.)	EC, MS, EEAS	*Once*
	3.4. Facilitate how the EU learns and maintain EU knowledge management systems on gender equality.	3.4.1. EU gender resource package (i.e. research, capacity development and knowledge building material) on-line (by April 2016)	EC	*Yes*
		3.4.2. Capacity4dev.eu user statistics on use of gender resources	EC	*Not applicable to WB.*
	3.5. Provide technical expertise on gender to EU actors at headquarters and in partner country	3.5.1. N# of queries responded to, disaggregated by thematic area	EC, EEAS, MS	*Not applicable to WB.*

[77] Milestone 1: mainstreaming started in 2016. Milestone 2: gender training is mainstreamed across all operational and management staff training by 2017

OBJECTIVES	ACTIVITIES	INDICATORS	ACTORS	FINDINGS
4. Robust gender evidence used to inform all EU external spending, programming and policy making.	4.1. Inform all actions, whatever aid modalities (e.g. budget support), with strong and rigorous gender analysis that is reflected in the final programme implementation.	4.1.1. N# of thematic, bilateral and regional programmes per year using gender analysis to inform design.	EC, MS	*53*
		4.1.2. N# of programme evaluations per year that include an assessment of impact on women and girls.	EC, MS	*Unavailable.*
	4.2. Establish quality assurance processes for project documents; and question spending approval wherever gender is not adequately considered.	4.2.1. Whether internal processes of methodological review are carried out to mainstream gender in quality assurance mechanisms (e.g. for the EC: Quality Support Group, etc.).	EC, MS	*Not yet.*
		4.2.2. N# of new Action Documents (or equivalent) commented and subsequently revised including for poor gender consideration.	EC, MS	*41*
	4.3. Ensure that consultation with National Gender Equality Mechanisms and Civil Society Organisations working on girls' and women's rights inform country level programmes, regardless of the sector.	4.3.1. % of programmes using findings of consultations with National Gender Equality Mechanisms, CSOs, women's organisations, to inform action design.	EC, MS	*Unclear, but rare.*

OBJECTIVES	ACTIVITIES	INDICATORS	ACTORS	FINDINGS
5. Results for women and girls measured and re-sources allocated to systematically track progress.	5.1. Corporate results frameworks (e.g. the EU Results Framework), include gender sensitive indicators and sex-disaggregated data.	5.1.1. Status of results monitoring on gender sensitive indicators (Milestone 1: by end 2016, if needed, corporate results frameworks are revised to include gender sensitive indicators and indication of sex disaggregation that is aligned with SDGs indicators. Milestone 2: By end-2016 all results gathered in addition to those included in corporate results frameworks are sex-disaggregated where relevant)	EC, MS	*Not yet.*
		5.1.2. % of results disaggregated where relevant by sex in Results Framework(s)	EC, MS	*Not yet.*
		5.1.3 Status of SWD indicators as compared to the SDGs (target – by end 2016, if needed, the SWD is reviewed taking the finalised SDG indicators into consideration)	EC, EEAS, MS	*Completed.*
	5.2. Revise SWD indicators on the basis of the agreed Sustainable Development Goals' (SDGs) monitoring framework/indicators			
	5.3. Apply systematically the Gender Equality Policy Marker of the OECD Development Assistance Committee (G-marker) and justify G0 scores to management.	5.3.1. N# of justifications for OECD Marker G0 scores (defined as: "no inherent potential to impact on gender equality"	EC, MS	*None.*
		5.3.2. % of new programmes that score G1 or G2 (Target: 85% of new programmes score G1 or G2 by 2020))	EC, MS	

OBJECTIVES	ACTIVITIES	INDICATORS	ACTORS	FINDINGS
6. Partnerships fostered between EU and stakeholders to build national capacity for gender equality.	6.1. Support the research and independent analysis capacity of national statistics institutes, academia and CSOs, including macro-economic analysis, gender responsive budgeting and gender stereotypes.	6.1.1. N# of research projects co-financed by EU (EUD/MS) on gender related issues	EC, MS	*1*
		6.1.2. N# of programmes reporting improvement in quality and availability of sex-disaggregated/gender specific statistics through EU support	EC, MS	*2*
	6.2. Reinforce the coordination between EU and (international) actors working locally, especially at political dialogue level.	6.2.1. N# of partner countries with gender coordination mechanisms that include (international) actors working locally	EC, MS	*3 (of 6)*
		6.3.1. N# of programmes for NGEM supported by EU	EC, EEAS, MS	*4*
		6.3.2. N# of sector programmes working with the NGEM		*2*
	6.4. Work together with media operators to raise their own and public awareness on gender equality.	6.4.1. N# of projects building awareness of local and national media on gender issues in partner countries and supported by EU	EC, EEAS, MS	*4*

OBJECTIVES	ACTIVITIES	INDICATORS	ACTORS	FINDINGS
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 law.	18.1 Support the participation of women's organisations as accountability agents in budgetary, legislative, and policy making processes at all levels..	18.1. N# of women Human Rights Defenders who have received EU Support (EURF)	NA	*Unavailable.*

ANNEX 2. METHODOLOGY

This annex provides further information regarding the research methodology used for this evaluation. The evaluation involved mixed research methods. First, a thorough analysis of relevant documents was conducted. This included GAP II, with the aim of mapping objectives, indicators and the main actors responsible for its implementation. In reviewing closely the GAP II, the team decided to limit the evaluation to focus on the Institutional Cultural Shift, based on the assumption that few results could be observed this early on related to the thematic objectives of GAP II. Additionally, the team decided to examine GAP II Objective 18, given its importance in relation to enabling WCSOs to support implementation of several indicators related to the Institutional Cultural Shift. The team also reviewed the EC's 2016 'Annual Implementation Report of the EU GAP II' and used as a source, including comparing findings therein with findings from WB countries. This information informed the creation of interview guides for interviews with different key stakeholders.

Second, a team of two researchers conducted semi-structured individual and group interviews with 92 key stakeholders, including representatives from EUDs, relevant governmental bodies coordinating EU accession processes, National Gender Equality Mechanisms (NGEMs), WCSOs, and UN agencies in seven locations in six WB countries: Pristina, Sarajevo, Banja Luka, Belgrade, Skopje, Tirana, and Podgorica. Interviews were conducted using different interview guides, developed for the Ambassador / Head of Delegation at EUDs, Head of Cooperation at EUDs, Political Section at EUDs, Task Managers at EUDs, Gender Focal Points at EUDs, governmental bodies coordinating EU accession processes, NGEMs and WCSOs. Questions pertained to objectives and indicators enlisted in the "Institutional Culture Shift in the European Union External Relations" section of the GAP II monitoring and accountability framework.

Third, the team transcribed and coded the findings, based on the relevant GAP II indicators. This information was used to draft the report, which was then sent to several research participants for verification.

ANNEX 3. PERSONS CONSULTED

NAME	TITLE	INSTITUTION	COUNTRY
Adelina Sokoli	Gender Equality Officer	Ministry of European Integration	Republic of Kosovo
Adriana Micu	Program Manager for Regional Policy	Delegation of the European Union to Montenegro	Montenegro
Ajsa Adrovic- Beslagic	Project Manager	Delegation of the European Union to BiH	Bosnia and Herzegovina
Aleksandra Nestorov	Project Manager	Women Against Violence Network	Republic of Serbia
Aleksandra Petric	Executive Director	Foundation United Women Banja Luka	Bosnia and Herzegovina
Anastasia Johanson	Junior Professional in Delegation	European Union Office in Kosovo	Republic of Kosovo
Ana Milenic	Gender Focal Point	Delegation of the European Union to the Republic of Serbia	Republic of Serbia
Audrone Urbonaviciute	Deputy Head of Cooperation section	Delegation of the European Union to Montenegro	Montenegro
Arta Musa-Krasniqi	Project Officer	European Union Office in Kosovo	Republic of Kosovo
Barbara Rotovnik	Rule of law and European integration Advisor	Delegation of the European Union to Montenegro	Montenegro
Belgjiare Muharremi	Director	NGO Dera e Hapur	Republic of Kosovo
Besa Qirezi	Gender Equality Officer	Ministry for Communities and Return	Republic of Kosovo
Blerina Rexhaj	Finance Coordinator	NGO Artpolis	Republic of Kosovo
Bobana Macanovic	Director	Autonomous Women's Centre	Republic of Serbia
Bojan Elek	Researcher	Belgrade Centre for Security Policy	Republic of Serbia
Branka Draskovic	Adviser to the Deputy Prime Minister	Minister of Construction Transport and Infrastructure	Republic of Serbia
Chloe Berger	Second Secretary	Delegation of the European Union to BiH	Bosnia and Herzegovina
Daniela Topirceanu	Program Manager on Agriculture	European Union Office in Kosovo	Republic of Kosovo
Diana Šehić	Co-Director	NGO Pravazasve	Bosnia and Herzegovina
Dolly Wittberger	Team Leader	UN Women Albania	Albania
Donata von Sigsfeld	Program Manager for territorial cooperation (CBC)	EUD	Montenegro
Edina Halapi- Stansfiel	Program Manager	Delegation of the European Union to Albania	Albania
Ekmel Cizmecioglu	Progam Manager for Civil Society and Human Rights	Delegation of the European Union to the Republic of Serbia	Republic of Serbia

NAME	TITLE	INSTITUTION	COUNTRY
Eleonora Formagnana	Program Manager for public administration reform and public finance management	Delegation of the European Union to Montenegro	Montenegro
Enkelejda Bregu	Gender Focal Point, , International Aid/Cooperation Officer	Delegation of the European Union to Albania	Albania
Erol Akdag	Human Rights Coordinator	Delegation of the European Union to Albania	Albania
Fedra Idzakovic	Co-Director	NGO Pravazasve	Bosnia and Herzegovina
Fetije Mehmeti	Director	NGO Gruaja Bashkohore	Republic of Kosovo
Fetije Smakaj	Director	NGO Okarina e Runikut	Republic of Kosovo
Hermann Spitz	Head of Cooperation Section	EUD	Montenegro
Igballe Rogova	Executive Director	Kosovo Women's Network	Republic of Kosovo
Imran Mazrek	Assembly Member	Municipality of Mamusha	Republic of Kosovo
Iris Aliaj	Lawyer	Centre for Legal Civic Initiatives	Albania
Ivan Lagator	Program Manager for infrastructure (transport)	Delegation of the European Union to Montenegro	Montenegro
Jelena Milinovic	Head of Department for Coordination	Centre for Gender, Equity and Equality	Bosnia and Herzegovina
Julia Jacoby	Task Manager	European Union Office in Kosovo	Republic of Kosovo
Lendita Gashi	Program Manager	European Union Office in Kosovo	Republic of Kosovo
Luigi Brussa	Head of Cooperation	European Union Office in Kosovo	Republic of Kosovo
Katarina Ivanovic	PR Coordinator	NGO Astra	Republic of Serbia
Magbule Elezi	Director	NGO Shoqta e Mamive te Kosoves	Republic of Kosovo
Mahije Smajli	Director	NGO Bliri	Republic of Kosovo
Maja Raicevic	Director	Women's Rights Centre	Montenegro
Miha Pezeij		European Union Office in Kosovo	Republic of Kosovo
Milana Rikanov	Gender Specialist/ Head of Office	UN Women	Republic of Serbia
Mirjna Maksimovic	Social Inclusion and Minorities	Delegation of the European Union to the Republic of Serbia	Republic of Serbia
Mirjana Music	Psychologist	NGO Zene Zenama	Bosnia and Herzegovina
Mladenka Tesic	Gender Focal Point, Cooperation section, programme manager for human rights and focal point for EIDHR and Roma	Delegation of the European Union to Montenegro	Montenegro
Nevenka Rikallo	Director	NGO Ruka Ruci	Republic of Kosovo
Nicola Bertolini	Head of Cooperation	Delegation of the European union to the Former Yugoslav Republic of Macedonia	Former Yugoslav Republic of Macedonia

NAME	TITLE	INSTITUTION	COUNTRY
Nicoals Bizel	Head of Operation section I justice	Delegation of the European union to the Republic of Serbia	Republic of Serbia
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Sanne Tielemans	Political Adviser	Delegation of the European Union to BiH	Bosnia and Herzegovina
Selma Cekic-Dincsoy	Gender Focal Point	European Union Office in Kosovo	Republic of Kosovo
Sevdije Musliu	Director	NGO Psikoterapeutet ne Veprim	Republic of Kosovo
Seylan Mazrek	Assembly Member	Municipality of Mamusha	Republic of Kosovo
Sladjan Maslac	Programme Manager for environment and energy	Delegation of the European Union to Montenegro	Montenegro
Sophie Beaumont	Programme Manager, Education & Gender; Disability Focal Point	Delegation of the European union to the Former Yugoslav Republic of Macedonia	Former Yugoslav Republic of Macedonia
Spomenka Krunic	Expert Advisor	Centre for Gender, Equity and Equality	Bosnia and Herzegovina
Stephen Stork	Head of Operations Section 1	Delegation of the European Union to Albania	Albania
Stergios Tragoudas	Program Manager Education	European Union Office in Kosovo	Republic of Kosovo
Tanja Slijepac	FIGAP Officer	Centre for Gender, Equity and Equality	Bosnia and Herzegovina
Tidita Fshazi	Program Manager	Delegation of the European Union to Albania	Albania
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NAME	TITLE	INSTITUTION	COUNTRY
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Vanja Macanovic	Coordinator	Autonomous Women's Centre	Republic of Serbia
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Vjollca Sejdiu	Project Assistant	NGO Iniciativa e Grave	Republic of Kosovo
Vesna Grkovic	Project Manager	Delegation of the European Union to BiH	Bosnia and Herzegovina
Vesna Vukmanic	Director	NGO Inicijativa i civilna Akcija	Bosnia and Herzegovina
Zeljeka Umicevic	Project Coordinator	Helsinki Citizen's Assembly	Bosnia and Herzegovina
Zljeko Volar		UDAS	Bosnia and Herzegovina
Zvezdana Budimovic Savkovic	Director	NGO Sandglass	Republic of Serbia

ANNEX 4. PROBLEMATIC GAP II INDICATORS

This Annex discusses some of the issues identified with the existing GAP II indicators, to date. First, 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 an 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.

RESEARCH SHOWS THAT A STRONG AND INDEPENDENT WOMEN'S MOVEMENT IS THE MOST CRITICAL FACTOR FOR IMPROVING WOMEN'S RIGHTS.