



## A Gender Review of the EU Growth Plan: The Reform Agenda of Kosovo

### Introduction

In November 2023, the European Commission (EC) adopted a [New Growth Plan for the Western Balkans](#) (WB), aiming to bring WB partners closer to the European Union (EU), to boost economic growth, and to accelerate socio-economic convergence.<sup>1</sup> The Growth Plan aims to incentivise WB states' preparations for EU membership and to accelerate fundamental reforms. The total budget is **€6 billion**. As part of the Growth Plan, every WB partner country was invited to prepare a reform agenda based on existing recommendations from the EU, including from the annual Enlargement Package and countries' Economic Reform Programmes.

In Kosovo, the "[Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#)" (hereafter, "Reform Agenda") was approved on 9 October 2024. Created in consultation with the EC, it is meant to compliment the [National Program for European Integration 2024-2028](#),<sup>2</sup> among other policies. Funds from the European Growth Plan will be in addition to those from the Instrument for Pre-Accession (IPA), planned in the amount of approximately €950 million for Kosovo. Half is expected to support the Kosovo state budget in implementing reforms, while the other half is to finance investment projects.<sup>3</sup> Payments are expected to be made twice annually, following the achievement of planned reforms, verified by the EC; relevant payment conditions include macro-financial stability, sound public financial management, transparency, and budget oversight.<sup>4</sup> Further, "Kosovo must implement the agreed qualitative and quantitative steps by 31 August 2027 at the latest, and submit a duly justified request for the release of funds in respect of fulfilled payment conditions related to these quantitative and qualitative steps."<sup>5</sup> The European Parliament also will play a role in monitoring the disbursement of money and ensuring that the conditionality principle is respected.

Gender equality is a [fundamental value](#) of the EU. Both the EU and the Government of Kosovo have committed to furthering gender equality in all their actions and financing.<sup>6</sup> Considering the size of investments and the opportunities that this new tool offers for expediting EU Accession-related reforms, this paper examines the extent to which Kosovo's Reform Agenda includes a gender perspective, towards inclusive, gender-responsive development. The following sections examine the gender-responsiveness of Kosovo's Reform Agenda, with section numbering and titles corresponding with each of the sections in the Reform Agenda.<sup>7</sup>

### 1. Main Challenges and Problem Analysis

Based on Kosovo's Economic Reform Programme, the Reform Agenda outlines Kosovo's most significant "structural challenges to competitiveness and inclusive growth":

---

<sup>1</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#), 2024, p. 12.

<sup>2</sup> Previously, from 2016 to 2022, this was titled the National Programme for Implementation of the Stabilisation and Association Agreement (NPISAA).

<sup>3</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#), 2024, p. 99.

<sup>4</sup> For more information, see the EC website, "[Growth Plan for the Western Balkans](#)", accessed 11 Nov. 2024.

<sup>5</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#), 2024, p. 33.

<sup>6</sup> The EU has committed to furthering gender equality through its external financing, as emphasised in the [EU Gender Action Plan \(GAP\) III](#). In its [Law on Gender Equality \(LGE\)](#), the Government of Kosovo has committed to mainstreaming gender in all of its work. Article 5 states: "1. In order to prevent and eliminate gender discrimination and achieve gender equality, Republic of Kosovo Institutions which include bodies at all levels of legislative, executive, judicial and other public institutions shall be responsible to implement legislative and other measures including: 1.3. gender mainstreaming of all policies, documents and legislation".

<sup>7</sup> The numbering of sections is based on the Reform Agenda. As the Kosovo Women's Network (KWN) did not have comments on some of sections, they are not included here, and the numbering of sections thus skips some numbers.

- *Improving energy security and sustainability by reforming the energy sector, transitioning to renewables and tapping energy saving potential;*
- *Encouraging sustainable employment by improving quality education and labour market needs; and*
- *Reduction of the informal economy and improving the environment for doing business.*<sup>8</sup>

The overall analysis does not mention the very gendered dimensions of these challenges. Encouraging sustainable employment relies on increasing women's concerning low labour force participation rate; and addressing the informal economy necessitates a gender-responsive, "do no harm" approach.<sup>9</sup> The overall analysis of main challenges observes a decrease in the unemployment rate "from 25.9% in 2020 to 10.7% in the second trimester of 2023" but lacks sex-disaggregated data.<sup>10</sup> Moreover, the unemployment rate is not the best indicator of improved labour force participation as it does not consider those entirely outside the labour force. From this perspective, women's participation has increased but remained low (from 15.8% in 2020<sup>11</sup> to 24.2% in 2023<sup>12</sup>) despite higher increases in men's participation (from 44.8% in 2020 to 55.5% in 2023). The root causes contributing to this are not identified here. For example, that Kosovo's outdated labour law contributes directly to employers' discrimination against women in hiring to avoid paying for maternity leave,<sup>13</sup> women's poor access to capital,<sup>14</sup> and insufficient childcare availability<sup>15</sup> are not enlisted among key factors hindering women's labour force participation and thus Kosovo's economic growth. Including gender analysis related to these key challenges would have better gender-mainstreamed the document and underlined the importance of addressing these gender-related challenges.

“

**A 'do no harm' approach to gender equality requires that projects/programmes conduct an analysis of the potential risks of unintentionally perpetuating or reinforcing gender inequalities in the context of the intervention, proactively monitor risks, and take corrective/compensatory measures if applicable.**

- OECD Development Assistance Committee

”

Meanwhile, some gender-related issues are addressed later in this section. The subsection on **Education and labour market** does identify significant gender disparities in the labour market, observing male employment at 49.4% and female employment at 18.4% as a critical challenge. It states that this inequality hampers economic growth, perpetuating poverty and limiting opportunities for women. It also mentions women's socialised caretaker role coupled with insufficient childcare services as factors exacerbating "gender disparities in the workforce, limiting economic growth and perpetuating cycles of poverty and inequality".<sup>16</sup>

However, other areas of the overall problem analysis that could have included gender analysis, but did not, are:

- **Governance, public administration reform (PAR) and public finance management (PFM):** It does not state that: 1) coordination in public policy planning needs obligatory quality assurance, which requires

<sup>8</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#), 2024, p. 11.

<sup>9</sup> In accordance with the Organisation for Economic Cooperation and Development (OECD) Development Assistance Committee (DAC) [Gender Policy Marker guidance](#), "A gender analysis and a 'do no harm' approach is mandatory for all aid activities to ensure at minimum that the project/programme does not perpetuate or exacerbate gender inequalities". Related to addressing informality in Kosovo using such an approach, see KWN, [In the Shadows: A Gender Analysis of Informal Work in Kosovo](#), 2024.

<sup>10</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#), 2024, p. 12.

<sup>11</sup> Kosovo Agency of Statistics (KAS), [Labour Force Survey Q4](#), 2020, p. 15.

<sup>12</sup> KAS, [Labour Force Survey 2023](#), 2024.

<sup>13</sup> KWN, [Gender-based Discrimination and Labour in Kosovo](#), 2022.

<sup>14</sup> KWN, [Kosovo Gender Analysis](#), 2018.

<sup>15</sup> KWN, [Who Cares? Demand, Supply, and Options for Expanding Childcare Availability in Kosovo](#), 2016.

<sup>16</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#), 2024, p. 16.

gender equality impact assessments to be conducted before policies are proceeded for approval;<sup>17</sup> 2) merit-based recruitment must include affirmative measures to ensure implementation of the [Law on Gender Equality](#) (LGE) requirements for equal representation of women and men; and 3) gender-responsive budgeting needs to be institutionalised within new laws and existing PFM systems to implement LGE requirements,<sup>18</sup> as well as commitments to the Public Expenditure and Financial Accountability ([PEFA](#)) [Gender Framework and Sustainable Development Goal](#) (SDG) indicator [5.c.1](#).

- **Green and Digital Transition:** Despite discussion of “a just transition that does not leave segments of the population behind”, the Reform Agenda does not include gender analysis related to the green transition or energy poverty; nor is the need for an inclusive, gender-responsive digital transition stated explicitly; nor is a gendered approach to cybersecurity issues mentioned.<sup>19</sup>
- **Private sector development and business environment:** The gendered nature of challenges related to human capital, access to finance, and occupational stereotypes are not mentioned.<sup>20</sup>
- **Education and labour market:** The need for inclusive, gender-responsive digital literacy and digitalisation is not stated.<sup>21</sup>
- **Fundamentals/Rule of Law** fails to mention the very gendered nature of crime, with 95%<sup>22</sup> of crimes perpetrated by men. Nor does it observe in this section that gender-based violence is one of the most prevalently perpetrated crimes. While human and minority rights are explicitly mentioned, women’s rights and those of lesbian, gay, bisexual, trans\*, queer, intersex and other identifying (LGBTQI+) persons are not.

Both the EU and the Government of Kosovo have committed to ensuring that gender analysis informs all programming and expenditures.<sup>23</sup> The Reform Agenda thus could have included more gender analysis in this section towards better informing targeted reforms.

## 2. Objectives of the Reform Agenda

In its objectives, the Reform Agenda commits to “addressing gender equality”, primarily related to addressing gender-based-violence.<sup>24</sup> Related to the “Contribution of Reform Agenda to the achievement of the general objectives of the Reform and Growth Facility”, the Reform Agenda refers generally to EU values, which include gender equality, though it is not mentioned explicitly. Only a few references are made to furthering gender equality in the section on how the Reform Agenda will contribute to the Facility, primarily related to “Human Capital Development and Retention”: early childhood education and increasing women’s labour force participation; and “Protecting fundamental rights” by “strengthening protections against domestic and gender-based”.<sup>25</sup> The fact that gender is not mainstreamed in all sections is unsurprising as the EC Growth Plan itself never mentions gender equality.<sup>26</sup> The fact that the EC’s Growth Plan is completely gender neutral constrains the extent to which partner countries’ Reform Agendas, could reference commitments to furthering gender equality. Gender mainstreaming has been left up to countries. From this perspective, Kosovo’s efforts to integrate a gender perspective are admirable and go beyond EC requests.

## 3. Consistency with the Overall Policy Framework

---

<sup>17</sup> The OPM [Better Regulation Strategy 2.0 for Kosovo 2017-2021](#) required gender (equality) impact assessments to be conducted, and officials have stated that these requirements remain in place. The Agency for Gender Equality in the OPM has provided guidelines on how to conduct such assessments: [Gender Equality Impact Assessment Manual](#) (2019).

<sup>18</sup> KWN, [Policy Brief: GRB in Kosovo 2024 Budget](#), 2023.

<sup>19</sup> KWN, [Gender Equality: At the Centre of IT...and Beyond](#), 2024.

<sup>20</sup> KWN, [Kosovo Gender Analysis](#), 2018.

<sup>21</sup> KWN, [Gender Equality: At the Centre of IT...and Beyond](#), 2024.

<sup>22</sup> KAS, Number of adult persons convicted of criminal offenses by courts and gender, 2019.

<sup>23</sup> Law on Gender Equality, [Article 5](#). The EU [Gender Action Plan III](#) commits to using the OECD Gender Equality Policy Marker, which requires gender analysis to inform all programs and their gender-marking.

<sup>24</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#), 2024, p. 17.

<sup>25</sup> *Ibid.*, p. 18.

<sup>26</sup> EC, [New Growth Plan for the Western Balkans](#), Brussels, November 2023.

The Reform Agenda contains a chapter illustrating its consistency with Kosovo's overall policy framework, including the Economic Reform Programme 2024-2026, National Development Strategy and Plan 2030, and the National Programme for European Integration, among others. This section illustrates how reforms planned in the Reform Agenda align with similar pre-existing commitments, such as increasing women's labour force participation. Given that these are pre-existing policies, the content of this section remains consistent with the content of original policies. Thus, the extent to which prior policies were gender-mainstreamed affects how the Reform Agenda could integrate such commitments. Opportunities existed to further gender mainstream these policy documents, and thus the Reform Agenda.<sup>27</sup>

#### 4. Key Policy Priorities

Several of the key policy priorities outlined in this section of the Reform Agenda are gender neutral, meaning they lack any reference to furthering gender equality. However, they could have addressed gender inequalities described in the prior problem analysis section. For example, **4.1. Fundamental Sectors**, related to rule of law, could have mentioned addressing the gendered nature of crime, gender-based violence as a key rule of law issue, and women's rights as human rights (in addition to minority rights, which is explicitly mentioned). Additionally, **4.2. Digital Transformation and Digital Security Issues** could have referred to the need for inclusive, gender-responsive digitalisation and cybersecurity.<sup>28</sup> Only priority "**4.3. Education, Training, Employment and Social Objectives**" includes clear objectives that will contribute to gender equality. It plans to expand access to early childhood education and to have a "positive impact on the employment prospects and labour productivity of mothers".<sup>29</sup> It further foresees "increasing the labour market participation of women, young people and vulnerable groups".

#### 5. Mainstreaming

The Reform Agenda contains a chapter on mainstreaming, including a section dedicated to gender mainstreaming. It states that Kosovo has "reflected the aspect of gender mainstreaming during the process of identification and planning of reforms within its Growth Facility Reform Agenda and will attempt to do so during its implementation by striving to make sure that benefits of these reforms are shared equally between women and men, girls and boys".<sup>30</sup> Related to *fundamental rights and the rule of law*, the Government commits to:

strengthening enforcement of the legislative and strategic framework on protection against domestic and gender-based violence, drafting of the Kosovo regulatory framework for gender responsive budgeting, implementation of the ex-ante gender impact assessment in all new regulator frameworks, and the preparation of the new Kosovo Gender Equality Program, the whole-of-government effort to advance gender equity and equality for all in Kosovo.<sup>31</sup>

The Reform Agenda seeks to address inequalities in labour force participation by integrating gender equality into key sectors, including education, business environment, and public administration. Reforms aim to improve women's participation in the labour market through active measures, enhancing their access to finance, and promoting gender equality in leadership roles in public institutions. Other enlisted commitments towards gender equality include:

In the policy area of *human capital*, we will work toward increasing the participation of women in the labour market through active labour market measures. In the policy area of *private sector development and business environment*, we will work towards enhancing women's access to finance through the Kosovo Credit Guarantee Fund (KCGF) and by directly supporting SMEs and start-ups owned by women. [...] In the policy area of *public administration reform*, we will, through regular recruitment

---

<sup>27</sup> KWN has submitted detailed comments on several of these policy documents, indicating how an improved gender perspective could be included.

<sup>28</sup> KWN, *Gender Equality: At the Centre of IT...and Beyond*, 2024.

<sup>29</sup> Kosovo Government, *Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo*, 2024, p. 31.

<sup>30</sup> *Ibid.*, p. 31.

<sup>31</sup> *Ibid.*, p. 31.

processes, make efforts to increase gender equality in public institutions, in particular in management and decision-making positions.<sup>32</sup>

These commitments address some of the key gender inequalities in Kosovo. Additional commitments could have sought to gender-mainstream *Digital Transformation and Digital Security Issues*.

The fact that the EC's template for the Reform Agenda includes a separate section on gender equality and mainstreaming, rather than requesting gender mainstreaming *within* the key policy priorities section, undermines the meaning of *mainstreaming*, which is to include (mainstream) gender within priorities and plans.<sup>33</sup> This means that governments were not required explicitly to mainstream attention to furthering gender equality within each reform, but rather to treat it as an afterthought. Ensuring implementation of gender equality commitments requires clear objectives, indicators, baselines, and targets to enable monitoring and evaluation of impacts. Otherwise, risks exist that such commitments may not be implemented or reported on.

The Reform Agenda acknowledges the Government's "good practice" of consulting CSOs in May 2024, stating that the "analytical insights and expertise brought by several of the most active CSOs dealing with gender equality and women empowerment will be useful in the implementation of these reform[s]".<sup>34</sup> The Government commits to "continuous monitoring by CSOs dealing with gender equality and women empowerment, aiming at ensuring effective gender mainstreaming throughout this ambitious reform process".

## **6. Policy Area 1: Governance, Public Administration Reform and Public Finance Management**

Part II of the Reform Agenda elaborates policy areas and planned reforms. Related to *1.1. Public Administration Reform*, neither the "Challenges" (problem analysis) section, nor the "Objective" or "Qualitative and Quantitative Steps to be taken under this reform" sections are gender responsive. They could have mentioned institutionalising gender-responsive merit-based recruitment in line with the LGE as relevant to this section, rather than in the mainstreaming section. Nor does *1.2. Public Finance Management* mention the need for gender-responsive budgeting, including clarifying the use of affirmative measures in procurement, as part of foreseen amendments to the Law on Public Procurement. Rather than mentioning gender-responsive budgeting in the mainstreaming section, it could have been included here with a clear target to institutionalise gender-responsive budgeting in the forthcoming amendments to the Law on Public Financial Management and Accountability and Law on Public Procurement. In addition to being a requirement of the LGE, gender-responsive budgeting could support foreseen public finance management reforms by improving transparency, accountability, and budget planning via obligatory (gender) impact analysis. While "best international standards" are mentioned, the PEFA Gender Framework could have been referenced among them. This would include ensuring gender analysis as part of annual performance audits.

## **7. Policy Area 2: Green and Digital Transition**

Related to this policy area, *2.1. Digitalisation of Public Services and Infrastructures* does not include ensuring gender analysis as part of the planned review of draft laws and policies to prevent administrative burden. Nor is inclusive, gender-responsive digitalisation of services mentioned explicitly. *2.2. Cybersecurity* lacks gender analysis as well as attention to gender-responsive reforms and new cybersecurity legislation. *2.3. Market Reforms* mentions investing in "both men and women" in the workforce, but this does not relate explicitly to other sector reforms. Gender impact analyses would be relevant to the planned reforms to the legal framework, *2.4. Decarbonisation Policy* and the planned register of vulnerable consumers, *2.5. Renewables Deployment*, and *2.6. Energy Efficiency*, through it is not mentioned.

---

<sup>32</sup> Ibid., p. 31.

<sup>33</sup> A comparison with other WB countries' reform agendas suggests that the same template was used for all countries. Thus, the EC seems not to have required mainstreaming attention to gender equality in each of the core reforms, but rather this general discussion. The same approach has been used in IPA programming. Notably, the "do no harm" section of the template also seems to refer only to the environment and not to the "do no harm" principle with respect to social and gender considerations.

<sup>34</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#), 2024, p. 32.

## 8. Policy Area 3: Private Sector Development and Business Environment

*3.1. Business Environment* lacks any gender analysis or “steps”, such as related to the planned financing small businesses and start-ups, including ICT and the green and circular economy, or the Intelligent Transport System. *3.2. Access to Finance* lacks gender analysis related to challenges. However, it includes “scaling the Kosovo Credit Guarantee Fund to better support MSMEs, especially women in business, farmers, and start-ups” in planned steps.<sup>35</sup>

## 9. Policy Area 4: Human Capital Development and Retention

*4.1. Education* includes an action focusing on early childhood education, which can indeed “facilitate the participation of women in the labour market”.<sup>36</sup> The Reform Agenda identifies the need to address “gender stereotypes” in curricula and textbooks, ensuring “gender equality is a general standard”, and to further a gender-balance among textbook authors and female experts consulted in curricula development.<sup>37</sup> During implementation, quality review of pre-university education curricula and textbooks will need to require gender screening using the Manual for the Prevention of Gender Stereotypes in textbooks to ensure books do not reinforce gender norms and relations, but rather challenge them. Meanwhile, the Reform Agenda does not include gender analysis or steps related to gender-responsive digitalisation of education.<sup>38</sup> Improving the quality of education through teachers’ professional development and licensing could have included ensuring teachers are qualified in gender-responsive pedagogy and teaching towards transforming gender norms.<sup>39</sup> Evaluations of school performance need to include indicators towards furthering gender equality, including gender-balanced faculty, policies towards gender equality and against sexual harassment, and the quality of gender-transformative education.<sup>40</sup>

The *4.2. Labour Market* reforms include clear commitments to “Increase labour market participation of women, young people and vulnerable groups through the ongoing restructuring and improved administrative capacity of public employment services”.<sup>41</sup> The challenge of women’s labour force participation is discussed and the need for more early childhood education services is explained. Yet other root causes are not stated in the problem analysis, such as urgently needed amendments to the labour law to make the state, rather than employers, responsible for maternity leave benefits, towards decreasing gender-based discrimination in hiring.<sup>42</sup> The planned step for vocational education and training (VET) and adult education for teachers and trainers to be “trained in the new curricula or already have relevant professional experience” could have included requiring qualifications in gender-transformative pedagogy and teaching.<sup>43</sup> While the reform foresees that “50% of Active Labour Market Measures will target women, youth (aged 15-29), people with disabilities, those living in rural areas and ethnic minority groups”, the target actually does not meet the level of need identified in the challenges (problem analysis), which would arguably call for more than 50% of resources to support diverse women, considering their substantially lower employment levels. Combining these groups into one target obscures differences among them. Intersectional gender impact analysis could have been used to identify the needs of each group, informing needs-based sex-disaggregated targets for each respective group: women and men youth, with disabilities, in rural areas, and minorities.<sup>44</sup>

---

<sup>35</sup> Ibid., pp. 67-68.

<sup>36</sup> Ibid., p. 70.

<sup>37</sup> Ibid., pp. 72-73.

<sup>38</sup> For suggestions in this regard, see KWN, *Gender Equality: At the Centre of IT...and Beyond*, 2024.

<sup>39</sup> Kosovo Government, *Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo*, 2024, p. 72. KWN’s forthcoming paper illustrates the need for this. See also KWN, *Integrating Gender-transformative Approaches in Early Education Curricula and Pedagogy*, 2024.

<sup>40</sup> See KWN, *Integrating Gender-transformative Approaches in Early Education Curricula and Pedagogy*, 2024. KWN has developed a methodology for assessing this based on best international practices, which could be used by the Ministry of Education, Science, Technology, and Innovation to inform inspection criteria. Gender-transformative refers to the need to change gender norms and relations (i.e., the social roles that women and men have in society), so that both women and men have equal opportunities to education and employment in diverse fields, as well as equal rights to spend similar amounts of time caring for and raising their families.

<sup>41</sup> Kosovo Government, *Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo*, 2024, p. 74.

<sup>42</sup> See KWN, *Gender-based Discrimination and Labour in Kosovo*, 2022.

<sup>43</sup> Kosovo Government, *Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo*, 2024, p. 77.

<sup>44</sup> This would have been in line with the EU *Gender Action Plan III*, which calls for an intersectional approach to EU external financing.

## 10. Policy Area 5: Fundamentals / Rule of Law

Planned reforms under *5.1. Judiciary* are gender neutral. Reforms related to the Case Management Information System (CMIS) could have included ensuring interoperability with the database for identification of gender-based violence cases, towards decreasing administrative burden for institutions responsible for using both systems.<sup>45</sup> Judicial inspection and disciplinary measures could have included gender equality related criteria such as addressing gender-based discrimination in rulings; low or suspended sentencing in cases involving gender-based violence;<sup>46</sup> and some prosecutors' and judges' illegal practice of "reconciling" criminal cases of gender-based violence, rather than ensuring *ex officio* (automatic) prosecution. The section importantly commits to finalising amendments to the Civil Code in 2025, which will ensure protections for "some of the most vulnerable sectors of Kosovo society, especially women and children, as well as the LGBTI persons".<sup>47</sup>

Actions related to the *5.2. Fight against Corruption* and *5.3. Fight against Organized Crime* are gender neutral. *5.4. Fundamental Rights* has a specific action to "5.4.1. Strengthen implementation of the legislative and strategic framework on the protection against domestic and gender-based violence and on the rights of non-majority communities".<sup>48</sup> The subsection on challenges focuses on the rights of non-majority communities without adequately discussing key problems contributing to gender-based violence. However, the "steps" under this reform do address the need to establish the National Coordinator Secretariat on gender-based violence and to ensure punishments above the minimum legal threshold. The Secretariat arguably should address *all forms* of gender-based violence in line with the Council of Europe Convention on preventing and combating violence against women and domestic violence ("[Istanbul Convention](#)"), and not only domestic violence cases.

Reform *5.5. Democracy* is gender neutral, though the planned introduction of "measures and/or penalties in the rules of procedure" could include penalties for gender-based discrimination in deputies' speeches and obligations for ensuring that obligatory gender equality impact assessments have been conducted properly (qualitatively) prior to accepting or adopting draft legislation from the Government.<sup>49</sup>

## 11. General Conditions for Payments

The section on **Macro-economic stability** focuses on Gross Domestic Product (GDP) as an indicator of growth. Growing evidence suggests that GDP is not the best indicator of progress and improved wellbeing, particularly considering that obscures inequalities among people in a population.<sup>50</sup> Also, Government plans to address the informal economy need a gender-responsive approach to ensure that they do not harm the most vulnerable groups.<sup>51</sup>

Related to **Public Finance Management**, Kosovo's positive PEFA performance is observed, but its [implementation](#) of the [PEFA Gender Framework](#) is not discussed. Nor is Kosovo's [progress in fulfilling](#) the [SDG 5.c.1 Indicator](#) on gender-responsive budgeting mentioned. A legal obligation under the LGE, gender-responsive budgeting also is important for **Transparency and oversight of the budget**; implementing the PEFA Gender Framework and SDG 5.c.1. would contribute to improving the transparency of public expenditures, including publishing information on how planned and implemented expenditures, respectively, are gender responsive. Generally, Kosovo's budget drafting process has been untransparent, without draft budgets being shared for public consultations in accordance with [Regulation \(GRK\) no. 05/2016 on minimum standards for public](#)

---

<sup>45</sup> According to the [Law on Prevention and Protection from Domestic Violence, Violence Against Women and Gender-Based Violence](#), "All institutions that provide services in cases of domestic violence are obliged to register the data in the database for identification of cases of domestic violence in the Republic of Kosovo within twenty-four (24) hours" (Government of Kosovo, Law no. 08/L-185, Article 61).

<sup>46</sup> According to the Kosovar Gender Studies Centre (KGSC), 74% of sentences monitored involved suspended sentencing (37 of 50 cases) ([The Istanbul Convention in the judgments of courts in Kosovo](#), 2022, p. 18). A "suspended sentence" involves a judge sentencing a person to jail or prison time but delays imposing the sentence, allowing the person to serve time while on probation. If probation is completed successfully, the judge typically dismisses the case.

<sup>47</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#), 2024, p. 81.

<sup>48</sup> *Ibid.*, p. 86.

<sup>49</sup> *Ibid.*, p. 88. See footnote 17 regarding the obligation for gender equality impact analysis.

<sup>50</sup> Costanza et al., "[Beyond GDP: The Need for New Measures of Progress](#)", 2009; Kubiszewski et al., "[Beyond GDP: Measuring and achieving global genuine progress](#)", *Ecological Economics*, 93:57-68, 2013; and Fleurbaey, Marc, "[Beyond GDP: The Quest for a Measure of Social Welfare](#)", *Journal of Economic Literature*, 47 (4): 1029-75.

<sup>51</sup> KWN, [In the Shadows: A Gender Analysis of the Informal Economy in Kosovo](#), 2024.

[consultation process](#). This lack of transparency has hindered the extent to which civil society can analyse the budget from a gender perspective and support more gender-responsive budgeting.

## 14. Consultation

The Reform Agenda has a section describing public consultations undertaken to inform it. The Government of Kosovo has a responsibility to ensure that all laws and policies undergo adequate public consultation as per [Regulation \(GRK\) No. 05/2016 on minimum standards for public consultation process](#). Generally, the Office for the National IPA Coordinator in the Office of the Prime Minister (OPM) informed the Kosovo Women's Network (KWN) about upcoming reforms in December 2023. Then, on 2 May 2024, the OPM published information that the Interministerial Council for European Integration discussed "the Reform Agenda within the EU Growth Plan for the Western Balkans and the key reforms of the National Program for European Integration 2024-2028".<sup>52</sup> There, the Prime Minister mentioned planned consultations with civil society, international financial institutions, and economic organisations on reforms. The Government informed civil society about the Growth Plan and preparation of the Reform Agenda through a consultation process that included separate meetings with civil society representatives and businesses in May 2024.<sup>53</sup> During the civil society consultation on 3 May 2024, OPM officials provided information about each policy area. Then, attendees could comment and ask questions. Civil society participation involved a rather balanced representation of women and men, and three representative of women's rights civil society organisations (WCOSOs) participated, including KWN.<sup>54</sup> Civil society could provide written input on the Reform Agenda as well, and KWN submitted comments on 8 May 2024. However, Kosovo officials indicated that the Reform Agenda had been difficult to negotiate with the EC and was essentially finalised when presented to civil society, with little space for revision. The final Reform Agenda was not shared through the official [public consultation platform](#).

A review of the final document suggests that much of civil society's input was not addressed, despite the final Reform Agenda stating that feedback was "addressed and reflected".<sup>55</sup> As noted, according to officials, the Reform Agenda had already reached a final version that was challenging to revise based on civil society consultations. A OPM representative stated: "The EC has not enabled substantive changes in how the steps of the reforms have been formulated."<sup>56</sup> This hampered the extent to which civil society could influence the content of the Reform Agenda, including from a gender perspective. Thus, the process of adopting the Reform Agenda arguably lacked adequate public consultation.

## 15. Monitoring, Reporting, and Evaluation

Government plans for *monitoring* implementation of the Reform Agenda do not explicitly mention engagement of CSOs or civil society expertise. However, in the *reporting process* section, the Reform Agenda states that:

The Government will also cooperate with civil society organisations, business associations and other stakeholders in implementation of reforms and monitoring their implementation. This will be done through the well-established, institutionalized forms and structures of cooperation, focusing on consultations, sharing of expertise and other forms of cooperation.<sup>57</sup>

WCOSOs could have been explicitly mentioned as stakeholders who can support the monitoring of reforms, particularly related to their quality, implementation on the ground in diverse communities, and gender-responsiveness. The role of WCOSOs was mentioned in the gender mainstreaming section of the Reform Agenda but could have been explicitly included (mainstreamed) in this section.

---

<sup>52</sup> OPM, "[The sixth meeting of the Ministerial Council for European Integration was held](#)", 2 May 2024, accessed 8 October 2024. The [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#) also describes consultations (pp. 97-98).

<sup>53</sup> Ibid.

<sup>54</sup> KWN, KGSC, and Women for Women Kosovo.

<sup>55</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Kosovo Reform Agenda](#), 2024, p. 98.

<sup>56</sup> KWN communication with the Government of Kosovo, 2024.

<sup>57</sup> Kosovo Government, [Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo](#), 2024, p. 103.



The Reform Agenda foresees engaging “joint EU-Kosovo stabilisation and association [SAA] bodies established under the SAA: Stabilisation and Association Council (SAC), Stabilisation and Association Committee and stabilisation and association subcommittees and special groups” in monitoring.<sup>58</sup> In this regard, the prior internationally acknowledged good practice of both the EU and Kosovo Government engaging civil society in consultations prior to SAA committee and subcommittee meetings could be continued, including attention to progress on the Reform Agenda.<sup>59</sup> These could include diverse WCSOs. The Reform Agenda’s planned regular publishing of six-month and annual reports on the implementation of reforms will indeed support accountability and transparency to the public. In accordance with both the EU’s and the Government of Kosovo’s commitments, reports should contain sex-disaggregated data on end-beneficiaries as well as further information related to how reforms have contributed to furthering gender equality, utilising gender impact analysis. This can reveal needs that can inform future reforms. In developing a “detailed” Reform Agenda reporting guideline,<sup>60</sup> the OPM can clearly require sex-disaggregated data and qualitative reporting on how reforms have contributed to gender equality. Planned audit and evaluation can include attention to gender equality impacts of expenditures in line with EU and Kosovo commitments to gender-responsive budgeting.

## 16. Control and Audit

The Reform Agenda outlines the process of control and audit. Notably, planned amendments to the public finance legal framework, especially the laws on Public Financial Management and Accountability and Public Procurement, could institutionalise gender-responsive budgeting throughout the budget cycle. This would provide clearer guidance for the implementation of gender-responsive budgeting. Control could include obligatory checks that gender-responsive budgeting is being applied appropriately, whereas audit could involve examination of gender equality impacts of expenditures, in accordance with LGE commitments to implementing gender-responsive budgeting and best practices in the [PEFA Gender Framework](#) and the [SDG 5.c.1 Indicator](#).

## 17. Communication

The communication and visibility plan foreseen by the Reform Agenda would require targeted, gender-responsive actions to reach diverse women and men who have different communication needs and means. Videos and infographics should require gender-responsive imagery that challenges socialised gender norms and encourages diverse opportunities for women and men. The selected key projects to be showcased should include a gender dimension, demonstrating the Government’s contributions to furthering gender equality. Monitoring and evaluation of reach should include sex-disaggregated by age, ethnicity, and other key demographic factors, in line with LGE requirements.

## 18. Annex 1: Steps and Payment Conditions by Policy Area

This annex to the Reform Agenda outlines the planned reforms, EU financial support, reporting indicators, baselines, steps to be taken according to a specified six-month timeframe, and payments foreseen based on each step achieved, among other information. While some of the Reform Agenda’s narrative is gender-responsive, as indicated in prior sections of this paper, not all commitments are reflected consistently in the Agenda’s indicators. A review of the indicators reveals that only four sub-areas explicitly address gender equality. First, under “Fundamental Rights”, regarding operational capacities for protection from domestic and gender-based violence, two targets relate to furthering gender equality:

- The National Coordinator Secretariat is established; Number of protection orders issued in 2025 by basic courts increased by 20% (baseline 2023)
- Punishments for domestic violence are above the minimum legal threshold in at least 80% of cases; Number of final convictions related to domestic violence using the domestic relationship as an aggravating circumstance in 2026 increased by 40% (baseline 2023)<sup>61</sup>

<sup>58</sup> Ibid., p. 100.

<sup>59</sup> Juzová, Jana, *Towards Inclusive EU Accession: Follow-up assessment of Western Balkans’ EU accession process from a gender perspective*, The Kvinna till Kvinna Foundation, Brussels, 2024, p. 30.

<sup>60</sup> Kosovo Government, *Reform and Growth Facility for the Western Balkans: Reform Agenda of Kosovo*, 2024, p. 102.

<sup>61</sup> Ibid., p. 133.

Second, the plan to “Increase labour market participation of women, young people and vulnerable groups through the ongoing restructuring and improved administrative capacity of public employment services” includes the partially illegible target: “50% of Active Labour Market Measures to target women, youth (aged 15-29), people [...]”. Third, on access to finance, the step includes:

Scale up the Kosovo Credit Guarantee Fund (KCGF) to improve access to financing with an emphasis on export-oriented manufacturers and service providers, as well as underserved [micro, small, and medium-sized enterprises] MSMEs such as women in business, farmers and start-ups by creating two additional windows: an export-oriented MSME window and a start-up window (companies registered for less than 2 years). Providing an additional Governmental EUR 20m contribution to the Fund’s Capital Structure.<sup>62</sup>

Fourth, the foreseen “Increase enrolment in and quality of the early childhood education by improving access to and quality of care system and services, promoting holistic development of children, and as a result also facilitate the participation of women in the labour market” has two targets to increase the share of children in early childhood education: ages 0-2 (8%) by December 2025 and 3-5 (45%) by December 2026. As stated, this can contribute to women’s labour force participation, though no indicator measure this precisely. The Reform Agenda also requires disaggregating some targets by sex, though baselines and targets are not provided, so contributions to gender equality will likely be unclear.<sup>63</sup> The lack of clear indicators and targets related to furthering gender equality will likely hinder monitoring and evaluating progress.<sup>64</sup>

Several reforms could have included indicators for measuring progress towards furthering gender equality, as KWN suggested during consultations on the draft Reform Agenda (see Annex I). For example, related to the labour market, a reform plans to “Increase labour market participation of women, young people and vulnerable groups through the ongoing restructuring and improved administrative capacity of public employment services”. The indicator is: “Degree of performance of public employment service”. No indicator measures the percentage of women, young women/men, and women and men from vulnerable groups (e.g., minorities and persons with disabilities) participating in the labour market. This will make it difficult to monitor and evaluate progress.

The absence of gender-responsive indicators across other areas, such as education, private sector development, and public administration reform, raises concerns about the Reform Agenda’s ability to achieve its stated goals or track progress towards gender equality outcomes. The lack of gender-specific benchmarks weakens accountability mechanisms and risks diluting the effectiveness of gender mainstreaming. Additionally, despite Kosovo’s commitments to gender-responsive budgeting, the expected EU financial support and payment provisions do not indicate planned budget allocations towards gender equality across the Annex.

## Conclusions

- The EC’s New Growth Plan is gender neutral, leaving WB governments responsible for including gender-responsive reforms within their Reform Agendas.
- The fact that the EC’s template for the Reform Agenda included a separate section on gender equality mainstreaming, rather than requesting gender mainstreaming throughout all sections of the Reform Agenda and clear targets related to furthering gender equality, undermined gender-mainstreaming.
- The extent to which pre-existing public policies are gender-mainstreamed has affected the extent to which reform agendas could prioritise and integrate commitments towards furthering gender equality.
- The Government of Kosovo has integrated attention to gender equality in some albeit not all policy areas. The Reform Agenda addresses several key issues underpinning gender inequality in Kosovo. Opportunities existed to integrate attention to gender equality in additional policy areas.

---

<sup>62</sup> Ibid., p. 129.

<sup>63</sup> For example, on primary and secondary education (4.1.3.) and Vocational Education and Training (4.2.2) (pp. 130-131).

<sup>64</sup> Monitoring of other EU Accession-related strategies, such as the European Reform Agenda, suggests that a lack of indicators can slow implementation of gender-responsive measures (see KWN, [Gender Mainstreaming the EU Accession Process: Country Assessment Report: Kosovo 2022, 2023](#)).

- Ensuring implementation of gender equality commitments requires clear objectives, indicators, baselines, and targets to enable monitoring and evaluation of impacts. Otherwise, risks exist that such commitments may not be implemented or reported on, undermining evaluation of intended impacts.
- Public consultations occurred too late in the process, hindering the extent to which civil society, including WCSOs, could influence the Reform Agenda and inform it with gender-mainstreaming expertise.

## Recommendations

### For the EU

- Ensure the process of monitoring and evaluating progress on the Reform Agenda includes analysis of the *quality* of implementation, including gender equality impact assessments.
- Hold the Government accountable to implementing gender-responsive budgeting as part of reforms, particularly considering that EU payments will be made twice annually following the EC's verification of the Government's achievement of relevant payment conditions and pre-conditions, such as macro-financial stability, sound public financial management, transparency, and budget oversight. The EC can ensure that these and the allocation of EU funding involves gender-responsive budgeting.
- Consult diverse WCSOs during the implementation, monitoring, and evaluation of the Reform Agenda, such as through consultations related to SAA committee and sub-committee meetings. Engage them in providing independent input to the monitoring and evaluation of the achievement of conditions.
- Ensure all future external financing regulations and facilities, including any future Growth Plan, implement EU commitments to the OECD DAC Gender Equality Policy Marker by clearly requiring that gender analysis informs all EU programming, and that all EU external financing involves clear objectives, indicators, and targets towards gender equality.

### For the Government

- Ensure gender-responsive reforms across *all* policy areas during implementation, in accordance with the LGE. Take the initiative to add, monitor, and evaluate additional and sex-disaggregated indicators related to the Reform Agenda Annex, measuring progress towards gender equality in all policy areas. For example, this can include tracking female enrolment rates in VET programs, monitoring women-owned business growth rates, and ensuring gender parity in public sector recruitment, particularly decision-making positions. See Annex I for additional suggestions.
- Publish regular Reform Agenda reports, as planned, including intersectional gender impact analysis as to how reforms are contributing to gender equality, as per the LGE. Ensure all public outreach related to the Reform Agenda involves a gender-responsive approach that attend to diverse women and men's communication needs and means.
- Ensure participation of WCSOs in the working group monitoring and reviewing the implementation of reforms. Continue the previously internationally recognised good practice of consulting civil society prior to SAA committee and subcommittee meetings, attending to progress on the Reform Agenda, ensuring participation of diverse WCSOs.
- Engage WCSOs and gender experts in monitoring and evaluating the extent to which reforms are contributing to gender equality, ideally compensating them for their time and expertise.
- Institutionalise gender-responsive budgeting in public financial management laws and systems, ensuring that the implementation of the Reform Agenda and all related direct budget support from the EU involves gender-responsive budgeting.
- Ensure that all future policies, laws, strategies, and programmes are designed based on gender equality impact analysis, as per the LGE. Include objectives, indicators, baselines, and targets to measure gender equality impacts.

## Annex 1. Missed Opportunities for Gender-mainstreaming the Reform Agenda Annex

The Reform Agenda Annex is important in that it sets forth the timeframe and targets that the Government must achieve to qualify for payments from the EU. The first four columns of the following table are from the Reform Agenda Annex 1: Steps and Payment Conditions by Policy Area. Based on a rapid gender analysis of the Annex, the last two columns suggest ways in which the Annex could have included more gender-responsive reforms (objectives) and “steps” (targets). KWN has underlined the text proposed to be added, including some new indicators. As the Annex has been finalised and approved, this is merely indicative with a few examples; it is not comprehensive. The Reform Agenda, and any similar future document, could benefit from a thorough gender analysis and mainstreaming. Also, it should be observed that some text in the final Reform Agenda was truncated and illegible. For these, KWN has drawn from the previously circulated draft Annex, though the potential exists that the content may differ.

Sub-area	Title of the reform	Indicator	Step	KWN proposed revision to reform	KWN proposed revision to step
<b>Public Administration Reform</b>	1.1.1 Strengthen administrative capacities by filling regularly vacancies in the public administration and reducing number of open vacancies and acting positions, while improving the management and evidence-based monitoring of human resources.	Degree of implementation of internal organisation regulations in line with LOFSAIA	80% planned open vacancies in the annual recruitment plan for state administration institutions are successfully filled through regular organisation of centralised recruitments and acting positions reduced to 20%	Strengthen administrative capacities by filling regularly vacancies in the public administration and reducing number of open vacancies and acting positions, <u>ensuring a gender balance</u> , while improving the management and evidence-based monitoring of human resources.	<u>Additional step: Increased percentage of women in the public administration, demonstrating improved gender balance following merit-based recruitment using affirmative measures.</u>
<b>Public Finance Management</b>	1.2.1 Complete the legal and institutional framework for the Public Procurement system	Degree of alignment of Public Procurement and Private Partnership legal frameworks with EU standards	Adoption by the Assembly of the new primary laws on Public Procurement and Public Private Partnership aligned with the latest EU acquis and EU standards	Complete the <u>gender-responsive</u> legal and institutional framework for the Public Procurement system <u>and financial management</u>	Adoption by the Assembly of the new primary laws on Public Procurement and Public Private Partnership aligned with the latest EU acquis and EU standards, <u>including gender-responsive budgeting</u> <u>Additional step: Institutionalise gender-responsive budgeting into public finance laws and system as part of new Law on Public Financial Management and Accountability</u>
		Degree to which the legal and institutional framework for public procurement is completed	Annual performance audit on procurement activities in line ministries in high-risk areas to detect and prevent corruption and irregularities. 10% of large public procurement contracts are awarded with the	Degree to which the legal and institutional framework for public procurement is completed <u>and implemented in line with gender-responsive budgeting</u>	Annual performance audit on procurement activities in line ministries in high-risk areas to detect and prevent corruption and irregularities <u>and assess use of affirmative measures towards furthering gender equality</u> 10% of large public procurement contracts are awarded with the use of best price-quality ratio as the contract award criterion <u>and</u>

Sub-area	Title of the reform	Indicator	Step	KWN proposed revision to reform	KWN proposed revision to step
			use of best price-quality ratio as the contract award criterion		<u>include measures for furthering gender equality in quality assessment</u>
			The project appraisal and selection guidelines and methodologies, which are in line with best international standards, are systematically applied to all capital projects by all budget organizations. Indicator: increased execution rate of capital spending to at least 80%		The project appraisal and selection guidelines and methodologies, which are in line with best international standards <u>including gender-responsive budgeting</u> , are systematically applied to all capital projects by all budget organizations. Indicator: increased execution rate of capital spending to at least 80%
<b>Digitalisation of public services and infrastructures</b>	2.1.1. Ensure user friendly digital public service delivery through administrative burden reduction and improved quality and increased number of services available online.	Extent to which user friendly digital public services are efficiently delivered	50% of public services for citizens and businesses are offered online through an on-line e-Kosova portal	Ensure user friendly, <u>gender-responsive</u> digital public service delivery through administrative burden reduction and improved quality and increased number of services available online.	50% of public services for citizens and businesses are offered online through an on-line e-Kosova portal, <u>using gender-responsive approach (e.g., in services prioritised for digitalisation)</u>
<b>Cybersecurity</b>	2.2.1. Comprehensive framework for cyber resilience (introducing requirements of NIS2 Directive and strengthening relevant institutions)	Extent to which a comprehensive framework for cyber resilience in line with requirements of NIS2 Directive is set up and operational	Establishment of a competent authority and list of entities (the Cybersecurity Agency acting as competent authority as defined in the NIS2) is operational: sufficiently staffed, equipped with supervisory powers, performing supervisory checks; list of entities in scope of the national law corresponding to the NIS2 Directive is finalized)	Comprehensive <u>gender-responsive</u> framework for cyber resilience in line with requirements of NIS2 Directive is set up and operational	Establishment of a competent authority and list of entities (the Cybersecurity Agency acting as competent authority as defined in the NIS2) is operational: sufficiently staffed and trained, <u>including related to gender-based cyberviolence</u> , equipped with supervisory powers, performing supervisory checks; list of entities in scope of the national law corresponding to the NIS2 Directive is finalized)
<b>Decarbonisation policy</b>	2.4.1 Implementation of climate and energy actions as per the National Energy and Climate Plan (NECP)	Extent of implementation of climate and energy actions as per the National Energy and	Adoption of a Just Transition Roadmap with an implementation timeline and indicators		Adoption of a <u>gender-responsive</u> Just Transition Roadmap with an implementation timeline and indicators
			Revision and adoption of the package of the secondary legislation for the implementation of the climate change law,		Revision and adoption of <u>gender-responsive</u> package of the secondary legislation for the implementation of the climate change law,

Sub-area	Title of the reform	Indicator	Step	KWN proposed revision to reform	KWN proposed revision to step
		Climate Plan (NECP)	including the legislative framework to enable the establishment of the MRVA		including the legislative framework to enable the establishment of the MRVA
			Establish a comprehensive register of vulnerable consumers and define a national objective to support energy poor households and vulnerable consumers in line with the Law on Energy and the NECP objectives		Establish a comprehensive, <u>sex and age-disaggregated</u> register of vulnerable consumers and define a <u>gender-responsive</u> national objective to support energy poor households and vulnerable consumers in line with the Law on Energy and the NECP objectives, <u>allocating financial support in a gender-responsive manner</u>
<b>Business environment</b>	3.1.1. Facilitate investments of private sector and improve mechanisms to attract FDI in strategic sectors promoting adoption of higher value-added products and services and innovation.	Degree to which innovation and entrepreneurship measures are implemented	Put in place a sustainable framework for supporting existing business incubators addressing innovative start-ups in the green and circular economy and ICT (minimum 30% to be covered by government)	Degree to which <u>gender-responsive</u> innovation and entrepreneurship measures are implemented	Put in place a sustainable framework for supporting existing business incubators addressing innovative start-ups in the green and circular economy and ICT (minimum 30% to be covered by government), <u>using affirmative measures to support those led by women, employing a gender balance of women and men, and/or with gender equality policies in place.</u>
			Creation of a window for innovation towards adoption of green technologies within Innovation Fund with sizeable number of beneficiaries (at least 40 companies)		Creation of a window for innovation towards adoption of green technologies within Innovation Fund with sizeable number of beneficiaries (at least 40 companies, <u>50% women-led, with women in leadership, and/or with a gender balance among employees</u> )
	3.1.3 Enhance export profile of strategic sectors, including through implementation of the Industrial Development & Business Support Strategy 2030.	Rate of export growth in strategic sectors	Support SMEs to help them address conformity assessment challenges in priority sectors with the aim of export growth (100 beneficiary companies)	<u>Add: Percentage of SMEs supported that overcome challenges, disaggregated by gender of leadership and employees.</u> <sup>65</sup>	Support SMEs to help them address conformity assessment challenges in priority sectors with the aim of export growth (100 beneficiary companies, <u>50% women-led, with women in leadership, and/or with a gender balance among employees</u> )
<b>Education</b>	4.1.1. Based on Education Strategy 2022 – 2026,	Degree of digitalisation of	Digital teaching materials developed and produced for	Based on Education Strategy 2022 – 2026, introduce a <u>gender-</u>	<u>Gender-responsive and transformative</u> digital teaching materials developed and produced

<sup>65</sup> Notably the original reporting indicator is not aligned with the “steps” (targets).

Sub-area	Title of the reform	Indicator	Step	KWN proposed revision to reform	KWN proposed revision to step
	introduce a digitalised education system by implementing digital infrastructure in schools, providing digital learning materials and developing the digital skills of teachers.	the education system:	basic subjects and secondary level and shared with all schools	<u>responsive</u> digitalised education system by implementing digital infrastructure in schools, providing digital learning materials and developing the digital skills of teachers.	for basic subjects and secondary level and shared with all schools
	4.1.2. Increase enrolment in and quality of the early childhood education by improving access to and quality of care system and services, promoting holistic development of children, and as a result also facilitate the participation of women in the labour market.	Degree of compliance with quality assurance framework in early childhood education	At least 80% of all ECEC institutions comply with at least 40% of the quality assurance framework		At least 80% of ECEC institutions comply with at least 40% of the quality assurance framework, <u>including gender-responsive teaching methods (pedagogy)</u> .
		Share of children enrolled in early childhood education	At least 8% of children aged 0-2 enrolled in pre-primary education.		At least 8% of children aged 0-2 enrolled in pre-primary education, <u>disaggregated by sex</u> .
			At least 45% of children aged 3 to 5 years enrolled in pre-primary education.		At least 45% of children aged 3 to 5 years enrolled in pre-primary education, <u>disaggregated by sex</u> .
		Degree of quality of early childhood education	At least 80% of all ECEC institutions comply with at least 40% of the quality assurance framework	Degree of quality of early childhood education, <u>including gender-transformative approach</u>	At least 80% of all ECEC institutions comply with at least 40% of the quality assurance framework, <u>including gender assessment</u>
		Degree of quality of primary and secondary education	Adoption of revised curriculum for grades 1-5; Adoption of revised curriculum for grades 6-10 and 70% of textbooks and teaching materials according to pre-university education levels	Degree of quality of primary and secondary education, <u>including gender-transformative approach</u>	Adoption of revised, <u>gender-transformative</u> curriculum for grades 1-5; Adoption of revised, <u>gender-transformative</u> curriculum for grades 6-10 and 70% of textbooks and teaching materials according to pre-university education levels
			At least 80% of new/accredited pre-service teacher training programmes are in line with teacher standards and curricula		At least 80% of new/accredited pre-service teacher training programmes are in line with teacher standards and curricula, <u>including gender-transformative pedagogy and teaching methods</u>
<b>Labour market</b>	Increase labour market participation of women, young people and vulnerable groups through	<u>New: Degree of women and men's labour</u>			<u>New: Adopt Labour Law in line with the EU Work-Life Balance Directive, especially in relation to maternity, paternity, parental, and carers' leave.</u>

Sub-area	Title of the reform	Indicator	Step	KWN proposed revision to reform	KWN proposed revision to step
	the ongoing restructuring and improved administrative capacity of public employment services.	<u>force participation</u>			<u>New: National Strategy on Combating Informal Economy is adopted inclusive of gender-responsive measures to encourage registration of workers, safeguard workers' rights, and ensure a do no harm approach</u> <u>New: [Increased]% of women and % of men in labour force.</u>
Judiciary	5.1.1. Improve the performance, integrity, accountability and efficiency of the judiciary, including by implementing the Joint Commitment Statement	Status of operational capacities of the judiciary <sup>66</sup>	Reinforcing the monitoring and reporting mechanism to ensure the full and effective use of the Case Management Information System (CMIS), based on accountability and linked to disciplinary measures.		Reinforcing the monitoring and reporting mechanism to ensure the full and effective use of the Case Management Information System (CMIS), based on accountability and linked to disciplinary measures, <u>ensuring interoperability with the database for identification of cases of domestic violence.</u>
		Status of Civil code	Adopt the Civil Code		<u>New: Adoption of Civil Code that safeguards human rights of women, men, and LGBTQI+ persons.</u>
Democracy	5.5.1 Improve the Assembly's performance in law making and oversight through improved planning, internal management and development.	Status of operational capacities of the Assembly	Introduce measures and/or penalties in the rules of procedure to ensure the Assembly can perform its role		Introduce measures and/or penalties in the rules of procedure to ensure the Assembly can perform its role, <u>including penalties for gender-based discrimination and obligations for ensuring that gender equality impact assessments have been conducted properly prior to accepting or adopting draft legislation submitted by the Government</u>

<sup>66</sup> Notably, the reporting indicators for this and the next indicator were not aligned with the steps but have been reversed to be better aligned.





**KVINNA  
KVINNA**

 **Sweden  
Sverige**

*This brief was written by Eleta Shala, Nicole Farnsworth, and Valmira Rashiti for the Kosovo Women's Network. It was financed by Sweden and the Kvinna till Kvinna Foundation, which do not necessarily agree with the opinions expressed within. The authors alone are responsible for the content.*