

BRIEFING NOTE No. 139

The EU's gender action plan: PRINCIPLES AND PRACTICE

GENDER

By Chloe Teevan

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The EU's latest Gender Action Plan (GAP III) lays out three principles that will guide the EU's approach to gender in external action: a gender-transformative approach, an approach that addresses intersectionality and an approach based on human rights. This briefing note zooms in on the first two principles, as these are new in GAP III. It looks at the evolution of intersectionality and gender-transformative approaches in a development context and at how EU delegations have applied these in programming in partner countries.

Delegations have had varying degrees of success in integrating the principles of GAP III into their planning around gender. While disability was the most widely appreciated intersectionality, other intersectionalities, most notably around LGBTQI+ rights, are often more difficult to tackle due to sensitivities in many countries. When it comes to implementing gender-transformative approaches, measuring progress is a major challenge. It is generally difficult to measure empowerment and disempowerment – and even more so within short project and programme timelines.

While the inclusion of intersectionality and gender-transformative approaches as key principles of the GAP III is a welcome development, the assimilation of these principles into EU thinking and practice will likely take time. To make progress, the EU needs to draw lessons from the experiences of delegations, ensure that its bureaucratic structures align well with its political ambitions, and put in place support systems and incentives that facilitate buy-in from all delegation staff members.

Introduction¹

The EU's Action Plan on Gender Equality and Women's Empowerment in External Action 2021–2025 (GAP III) introduces three ambitious principles that aim to guide the EU's approach to gender in external action: a gender-transformative approach, an approach that addresses intersectionality and an approach based on human rights (EC 2020, pp. 2-3). The human rights based approach was already present in the GAP II (EC 2015) and will not be the focus of this briefing note, which will explore the two new principles: the transformative approach and intersectionality. The transformative approach is defined in the GAP III as "examining, questioning, and changing rigid gender norms and imbalances of power which disadvantage women and girls and generate discriminations at all ages, starting from early childhood, in societies" (EC 2020, pp. 2-3). The GAP III states that addressing intersectionality means the EU should focus on the most disadvantaged women, paying attention to other factors that might further disadvantage women, including racial/ethnic and religious background, age, disability and sexuality. It specifically mentions that the GAP III should be read alongside the EU LGBTIQ equality strategy (EC 2020, p. 3).

While the concept of a transformative approach to gender is new in EU external action, it has been widely discussed in the academic literature over the years and a number of (I)NGOs have begun to explore and adopt transformative principles in recent years. The growing focus on transformative change follows critiques of an approach to women's empowerment that was overly based on individual self-improvement and short-term quantitative indicators, but that did not address deep-seated social norms and systems that reinforced gender inequalities. The focus on transformative change moves a discussion about empowerment away from a focus on the individual towards a more social understanding of empowerment (Hillenbrand et al. 2015, p. 5). It also calls into question the rhetoric of empowerment whereby simply providing women with resources will allow international donors to "bestow" empowerment on women, instead emphasising that empowerment is something that requires women to build their own individual and collective consciousness of their rights

and potential to act (Cornwall 2016, p. 343).

Intersectionality was originally conceptualised in the 1980s by Kimberlé Crenshaw, and "looks at the interwoven nature of social categories on multiple and simultaneous levels. It seeks to center the underlying systems of oppression in anti-discrimination." (Motsi-Khatai and Aced 2020). Within the context of international development, it is crucial to address structural power imbalances that inhibit progress toward UN Sustainable Development Goals, but it is important to note that differences based on race, ethnicity, or other identity markers need to be considered in context, as "groups can be positioned differently along the axis of power in distinct social and historical contexts" (Ryder and Boone 2019). Interviewees also pointed out that, while it is essential to understand the range of intersectionalities, it is important to take a community approach that brings all parties along. Interventions must appear fair as the appearance of favouring specific groups can ultimately lead to backlash.²

In this briefing note we will look further at the evolution of these two principles and their application to a development context; look at some of the challenges and opportunities facing EU delegations in integrating intersectional and transformative approaches into their work around the world; and look at some emerging best practices in terms of measuring transformative change both within the EU and beyond. The briefing note seeks to explore the meaning of these principles in a wider sense and draw lessons from interesting practices both within and also outside the EU, but that might have interesting implications for EU development programming and wider external action. It is the second of a short series of briefing notes that analyse EU GAP III implementation. The first note looked at the ways in which the GAP III is being integrated into the programming process in practice. This work thereby seeks to contribute to the evolution of the understanding of these principles within the EU institutions and EU delegations, and to contribute to an understanding of how they might be integrated into the EU's programming process. The third and last note of the series will look at the integration of the Women, Peace and Security agenda in the GAP III.

1. The transformative approach and intersectionality: Basing interventions on local realities

Theory and practice tends to emphasise the importance of a deep seated understanding of the context, the challenges and the local actors in order to integrate these principles into development policy, and indeed into wider external action.

The notion of transformative change is deeply rooted in the original concept of women's empowerment as developed by feminist scholars, but has been absent from many recent approaches to women's empowerment that have focused on economic empowerment through the provision of resources. Cornwall argues that for development to be transformative, two levers are necessary; one at the level of women's own consciousness and another at the level of society. Shifts in consciousness are necessary to shift women's own expectations and allow them to challenge social norms and systems that keep them in situations of subordination or dependency. At the same time, a wider change is necessary to tackle wider social norms and beliefs that exist at the level of the community or society, thereby addressing "commonly held and taken for granted assumptions that undergird gendered inequalities in any particular cultural context" (Cornwall 2016, p. 345-6).

The Pathways to Women's Empowerment programme, co-financed by the UK Department for International Development (DFID) and the Swedish International Development Cooperation Agency (SIDA) and led by Cornwall between 2006-2017, studied what enables positive change in women's lives ([Pathways](#)). It repeatedly touched on transformative approaches to women's empowerment. It provides some interesting takeaways in terms of the essential elements of a transformative approach to gender equality that ensures real empowerment for the women involved. One essential element that researchers in the project emphasised was the

importance of "consciousness raising" by actively engaging women in "critical, conscious, reflection on their own circumstances" and sharing that reflection with other women (Cornwall 2016, p. 346-7). Another takeaway emphasised the importance of engagement and empowerment of the practitioners putting projects into practice, who can play a role as agents of change (p. 348). It was also found that collective organisation played an essential role in breaking social isolation, allowing women to voice their concerns and to demand their rights (p. 350). Changing cultural representations of women in mainstream media, including tv and music, was also found to be an essential element in bringing about transformative change (Cornwall 2016, p. 354).

The concept of intersectionality is neither well understood, nor widely implemented in policy within the EU's own borders, and it is thus interesting to see it highlighted as one of the three principles of the GAP III, guiding EU action on gender equality in its external action. This is also the case for European law and legal systems. The Center for Intersectional Justice in Berlin states that: "European legal systems are currently blind towards intersectional discrimination." ([CIJ](#)) Indeed, the concept has been the subject of considerable debate within certain European countries such as France, notably with regard to the intersection with race ([Maad 2021](#)). This has caused some members of civil society to wonder how the EU might credibly integrate intersectionality into its external action.³ Debusscher and Manners note that despite a growing body of work on gender in EU external action, there is a lack of work touching on intersectionality in this area: "the question remains whether these policy developments involving multiple and intersecting grounds of discrimination are also being taken up in the external relations of the EU and what consequences this has for the quality of European gender equality policies abroad." (Debusscher and Manners 2020, p. 9).

In earlier research on how EU delegations were approaching gender in the ongoing programming process, we found that disability was the most widely appreciated intersectionality and was noted as an area for increased focus by multiple EU delegations, although it was not always clear how they planned to

do this. The Spotlight initiative, the EU's flagship partnership with the UN, also aims to integrate the specific vulnerabilities of women with disabilities ([Teevan et al. 2021](#)). Alongside gender, disability is also one of the areas where the EU has a specific marker as part of its Toolbox for the Human Rights Based Approach to International Partnerships ([EC 2021](#)). Other intersectionalities, most notably around LGBTQI+ rights, are often more difficult to tackle in development cooperation due to sensitivities around these issues in many countries. For example in Mozambique, where it was noted that tackling LGBTQI+ rights is essential, the EU has tried to tackle LGBTQI+ rights at the political level, but has no concrete projects supporting this group, and even the Spotlight Initiative struggles to integrate the specific challenges facing members of the LGBTQI+ community. Several member states support a local CSO, Lambda, and the EU has integrated discussion about legalisation of this organisation into its Human Rights Dialogue in Mozambique.⁴

This points to the importance of basing programme design and political dialogue on a solid understanding of the local situation, including a deep understanding of cultural and religious sensitivities. As part of the roll-out of the GAP III, EU delegations are updating country gender profiles (CGP), providing the perfect opportunity to analyse other structural power imbalances in partner countries, and how these intersect with gender. This will be an important step towards improving the integration of intersectional approaches into design, planning and reporting of actions, as well as into political dialogue. It is also an opportunity to highlight where opportunities for transformative change exist, and to analyse some of the underlying social norms and practices that are undermining change. It's not clear whether all EU delegations have used gender profiles as an opportunity to develop systematic analysis so as to integrate the principles into programme design. But one delegation interviewed shared that due to overlapping demands, the delegation was only able to update its country gender profile after the MIP and the CLIP were drafted and submitted.⁵ While this can't be generalised, this sequencing is not ideal. Yet, it speaks to how the EU's bureaucratic set up does not quickly adapt to the EU's conceptual ambitions. The

best case examples of CGPs should be identified and shared with delegations around the world.

To develop a deep understanding of local situations, of the cultural and religious sensitivities that must be tackled and of the best ways to do this, it is essential to work closely with local civil society, to strengthen and support their capacity, and to use their expertise to understand how to begin to tackle these important but often sensitive issues. EU delegations should develop much stronger, more supportive and longer-term relationships with local CSOs, rather than treating them simply as service providers or 'beneficiaries'. Only a strong and empowered CSO sector can lead to meaningful long-term transformative change and tackle deep-rooted intersectional inequalities.

2. Integrating the principles into the EU programming process and political dialogue

It appears that the principles of the GAP III are being integrated into the EU programming process in a relatively uneven manner. Some delegations seem to have centred these principles in their analysis of gender in partner countries and to a lesser extent in programme design, while others are struggling to include even basic gender mainstreaming in the programming process. Questions of internal structure, accountability and capacity within the EU and particularly within delegations will play an essential role in terms of integrating the transformative approach and intersectionality into the EU's programming process and political dialogue with partner countries.

An earlier ECDPM briefing note on the integration of the GAP III into the programming process already highlighted the importance of leadership on these issues and of creating a shared understanding and responsibility for gender across EU delegations, as well as improving coordination with EU member states present in each partner country ([Teevan et al. 2021](#)).

What is true for gender as a whole is even more true when it comes to the new principles of the GAP III. It will thus be vital for delegations to build their understanding of these principles – not just at the level of the gender focal point, but also in the wider cooperation and political staff – and it will be important that European headquarters (EU HQ) puts in place the right incentives to ensure that staff feel responsible for bringing these principles to life. In Morocco, the fact that gender is highlighted as a priority in the EU-Morocco partnership agreement, as well as adequate staffing within the delegation enabled a hands-on commitment to gender throughout the delegation.⁶ Equally, member states with a strong interest in furthering these principles, such as Ireland, should take responsibility for ensuring that these principles are disseminated amongst their embassy staff and that embassies play a role in championing these principles in partner countries.

An important element in terms of operationalising the principles of the GAP III in recent months has been the updating of the human rights toolbox to reinforce the non-discrimination and intersectionality dimensions. The toolbox clarifies concepts to guide EUDs throughout the project-cycle, and includes a gender marker and a disability marker ([EC 2021](#)). However, delegation staff in partner countries where the EU provides budget support would have to balance EU's gender markers and targets with those of partner countries'.⁷

Delegations have had varying degrees of success in integrating the principles of the GAP III into their planning around gender, including notably into the Multiannual Indicative Plans (MIPs) and Country-Level Implementation Plans (CLIPs). The MIPs lay out the EU's sectoral priorities for the programming process in different geographies, while the CLIP outlines how the EU intends to bring forward its gender commitment under the GAP III within the chosen sectors. These are a new development as part of the GAP III and the ongoing programming process, and are an attempt to boost meaningful gender mainstreaming in programming.

In Mozambique, although there have been discussions around the principles and in particular around how to

integrate intersectionalities such as disability into the programming process, it may be more difficult to dwell on these principles in the actual CLIP. In Nepal, the delegation tried to frame the EU's entire approach with regard to opportunities for a gender transformative approach. The EU delegation in Nepal has also highlighted the intersection of gender inequality with other inequalities including caste, ethnicity, religion, disability and sexuality in all of its analysis, including not only in the CLIP, but also in a recent conflict sensitivity analysis. An interlocutor mentioned that the GAP III and the CLIP process led to a reflection together with member states and other interested stakeholders about how to ensure that the framework for the programming process was truly transformative.⁸ In Morocco, the approach is to conduct political economy and power analysis per sector and identify gender dynamics and potential interventions in the sector.⁹ In coordination with relevant line ministries in Morocco the delegation is supporting 15 sectoral analyses.

Interestingly, in some parts of the world the EU is supporting potentially transformative practices that it does not in fact undertake domestically, including supporting selected countries to introduce gender-sensitive budgeting. This is the case in Morocco, where the EU, together with Agence française de développement (AFD), is supporting the work of the Centre of Excellence for Gender Responsive Budgeting (known by French acronym CE-BSG) within the Ministry for the Economy and Finance. The CE-BSG was created in 2013 and publishes a 'Gender Budget Report' annually. While this report evaluates the extent to which the principles of gender equality are integrated into public policies, its relevance has been further boosted by the adoption of '*La loi organique de finance*' or financial law by the Moroccan government in 2015. The financial law sets benchmarks – including in relation to gender – on inclusive finance and budgeting and annual reports towards these benchmarks and targets are reviewed by the parliament. The government's buy-in and use of gender as a performance indicator had facilitated a more proactive technical and political engagement between the EU and Morocco on gender.¹⁰ It has also added to the value-add of gender responsive budgeting and 'The Gender Responsive Budget' report

accompanies this reporting. CE-BSG has been supported by AFD and the EU since 2018. The EU/AFD support is linked to indicators across seven government departments, and is also supported by a grant to UN Women ([AFD 2021](#)). But the budget support is an important tool in EU development cooperation in Morocco and there are gender indicators attached to budget support to line ministries.¹¹

Again, it will be essential to draw lessons from this programming process, including developing a strong understanding of what allowed some delegations to integrate the principles of the GAP III into the MIPs and CLIPs in a meaningful manner, while others seem to have struggled to do so. Continued hiring of young professionals with the latest knowledge of best practices in terms of gender in development policy will be necessary, together with training for existing staff, which should not be limited to gender focal points but made obligatory on an annual basis across delegations. The experience of innovative programmes, such as the budget support to help roll-out gender-sensitive budgeting in Morocco, should be examined and could be rolled out more widely.

3. Challenges and best practices for measuring transformative change

In terms of the transformative approach, the monitoring and evaluation mechanisms adopted for the GAP III will be vital. One of the most difficult challenges in implementing transformative approaches to gender equality is that measuring transformative change requires a complete change in the kinds of indicators used to measure progress. It is difficult to tackle and to measure cultural dimensions of empowerment and disempowerment, and almost impossible if projects and programmes have short timelines and requirements to show progress using quantitative indicators. Several INGOs began to examine how to better integrate transformative approaches into their work in recent years, including exploring different approaches to measure transformative change. In Nepal, Finland has similarly

been working with UN Women to develop a new programme with the support of the EU delegation.

Annual reporting on the GAP III is likely to still be relatively focused on quantitative data, but a more qualitative, mid-term review report on the GAP III in 2023 will look at outcomes and impact. The reporting system for this is currently being set up, with inputs from member states. This will be vital to ensuring that the reporting on the GAP III moves beyond short timelines and short-term quantitative indicators of progress. It will be essential to integrate a longer-term perspective that allows for transformative change over the longer run. As we will explore below, member states have an important role to play in pushing the EU to move in the right direction on this topic, including playing a role as innovators and sharing best practices from the field.

In a 2015 study, Care International sought to unpack the concept and to look at promising practices (Hillenbrand et al. 2015). Plan International later adopted a gender transformative toolkit in 2020 following a lengthy process of research and adaptation that began in 2017. The new gender transformative toolkit was developed in consultation with country offices in all of the regions where the organisation works beginning in 2018, and feedback on the initial pilots was integrated into the gender marker. A reference group to accompany the implementation of the gender toolkit included regional leads and regional gender experts, alongside the gender team at Plan International's global office. The marker will be subject to a quarterly review with national offices feeding into regional hubs, which will in turn feed back to the global office. The organisation is seeking to tackle social norms and biases within its own staff by rolling out training across the organisation.¹²

In Nepal, the Finnish Embassy is working closely with UN Women, with the support of the EU delegation on a new programme that aims to demonstrate transformative change over the long-run. The project developed as the result of conversations about the limitations of quantitative data to show real change in social attitudes and norms, and the need to develop better indicators to measure changes in norms over time. Instead of following traditional development

practices, where indicators are usually defined by development practitioners, the project will seek to allow the populations targeted by the project to define the indicators. This will be developed through the use of an app called Sensemaker, which will allow participants to tell their stories, including through the use of pictures, videos and text. Participants will be able to quantify things themselves. The app also takes into account the needs of people with disabilities and illiterate participants. The project is currently being developed further through an extensive research phase that should also be repeated every two to three years in the same municipalities. This will allow for measuring change in these communities over an extended period of time, but also allow for any adjustments to be made.¹³

While the project has essentially been designed by Finland and UN Women, it is being supported and co-financed by the European Union, which sees this as a positive way to test new methods of measuring norm change over an extended period. It is seen as having many synergies with the overall approach of the EU in Nepal, which seeks to build synergies between all of the different work strands on gender and with other programmes that include a strong gender component.¹⁴

Ultimately, it will be essential to continue to learn from what is very much an evolving area of practice, and to continue to gather best practices and to develop new methods to measure transformative change over the coming years. Member states have an important role to play in bringing attention to interesting examples across the world and should ensure that their embassies are ready to play a role in moving this agenda forward.

4. Conclusion and recommendations

While it is extremely positive that the GAP III has included intersectionality and a transformative approach to gender equality as key principles, it is likely to take some time before these principles are fully assimilated into EU thinking and practice around

gender equality. It is essential that the EU and its member states base programmes on strong underlying analysis and work closely with civil society organisations and public administrations in partner countries and allow them to lead the way, as only they can develop the longer-term understanding and vision to bring about longer-term transformative change and to integrate overlapping intersectionalities. There will be a need for a profound shift in the structure, accountability and capacity of EU delegations, while EU member states also have an important role to play and can play a catalysing role in bringing about change. Further, continued learning and experimentation will be necessary in order to understand how to best implement and measure transformative change.

A strong underlying analysis of the gender dynamics in partner countries is essential to being able to act on gender equality issues in a given context, and should feed into the design and implementation of development programmes, as well as into wider external action. The gender country profile is one such opportunity, but a gender analysis that includes intersectionalities should be conducted as part of the design of every programme.

Providing women's rights organisations with institutional support over the medium- to long-term is essential in allowing them to develop a transformative approach. When organisations are forced to chase after short-term project funding, this often undermines more meaningful long-term efforts to achieve change. These organisations can play an innovative role if there is long-term support for capacity building rather than treating them as contractors. Similarly, it is essential to develop meaningful and supportive partnerships with these organisations, and to draw on their expertise to feed into policy dialogue (Cornwall 2016, p. 357).

It is essential that the right structures are in place so as to ensure that these principles are taken seriously at the level of EU delegations. As with the wider issue of gender equality as a whole, only the full commitment of the whole delegation will ensure that a transformative approach is adopted and that intersectional discrimination and inequalities are

addressed in EU external action. This means continuing to hire and train delegation staff to understand the major issues around gender equality, including developing their understanding of transformative development practice. This will better allow staff to analyse and respond to local needs, and to target resources towards meaningful interventions and organisations that can bring about transformative change (Cornwall 2016, p. 357).

Member states, such as Ireland, with a strong interest in furthering the transformative approach and intersectionality, should ensure that these principles are fully understood and integrated into the work of

their own embassy staff across the world, allowing them to play a leading role in championing these principles in partner countries.

Member states also have an essential role to play at the level of EU HQ in order to push the EU to develop monitoring and evaluation systems that allow for a longer-term perspective that measures transformative change in a meaningful way. Member states should share best practices from the field and bring in the views of civil society organisations, academics and gender experts from the field who can bring a new perspective to discussions in Brussels.

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Endnotes

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- ² Interview, 11 August 2021.
- ³ Interview, 25 June 2021.
- ⁴ Interview A, 10 August 2021.
- ⁵ Interview, 14 September 2021.
- ⁶ Interview, 29 September 2021.
- ⁷ Interview, 14 September 2021.
- ⁸ Interview A and B, 10 August 2021; Interview, 11 August 2021.
- ⁹ Interview, 29 September 2021.
- ¹⁰ Interview, 29 September 2021.
- ¹¹ Interview, 29 September 2021.
- ¹² Interview, 7 June 2021.
- ¹³ Interview B, 10 August 2021.
- ¹⁴ Interview, 11 August 2021.

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HEAD OFFICE
SIÈGE

Onze Lieve Vrouweplein 21
6211 HE Maastricht
The Netherlands *Pays Bas*
Tel +31 (0)43 350 29 00
Fax +31 (0)43 350 29 02

BRUSSELS OFFICE
BUREAU DE BRUXELLES

Rue Archimède 5
1000 Brussels *Bruxelles*
Belgium *Belgique*
Tel +32 (0)2 237 43 10
Fax +32 (0)2 237 43 19

info@ecdpm.org
www.ecdpm.org
KvK 41077447