Marginalizing Migrant Women’s Associations in EU Policies: Tracking EU Funds
Editors and writers: Nurhidayah Hassan and Gea Meijers, WIDE+; proofreader: Alison Whyte, with the contributions and support from:

The members of the WIDE+ Migration and Gender Working Group Silvina Monteros Obelar and Tatiana Retamozo (Spain), Red de Mujeres Latinoamericanas y del Caribe en Espana (RED); Jennifer Kamau (Germany), International Women’s Space; Jelena Hrnjak, Marijana Savic and Oluwakemi Oyewole Kimi (Serbia), Atina; Julissa Jauregui (Spain), Alianza por la Solidaridad; Marcela de la Peña Valdivia (Belgium) and Cristina Reyina (the Netherlands) individual members WIDE+, Ulla Björnberg and Nancy Contreras (Sweden), Gadi; Lejla Smajlovic (Sweden), Lex Femmes, Martha Salazar (Denmark), KULU Women and Development, Luciana Davies (Spain), Mujeres Con Voz, Paula Riedemann (Spain), Calala Fund.

And Alyna C. Smith and Giacomo Manca (Belgium), PICUM & ECRE; Alexandra Geese (Germany), Member of European Parliament on behalf of Die Grünen; Sinem Yilmaz (Belgium), European Network of Migrant Women; Karen Weisblatt (France), Weisblatt & Associés.

The editors want to thank all the members of the WIDE+ migration and gender working group experts that shaped this paper and the project it is part of. The views and opinions are the sole responsibility of the editors do not necessarily reflect the views of their associations, nor of the FOSI or OSF.

All illustrations are by Marga RH.

Copyright © 2022 WIDE+

This publication is made possible with in part by a grant from the Foundation Open Society Institute (FOSI) in cooperation with the Human Rights Initiative of the Open Society Foundations (OSF).

Any parts of this publication may be reproduced without permission for educational and non-profit purposes if the source is acknowledged. WIDE+ will appreciate a copy of the text in which the document is used or cited. Please send to info@wide-network.org
SUMMARY OF PAPER

This paper assesses whether the EU adequately contributes to protecting the rights of migrant women and promoting equality between migrant women and (migrant and non-migrant) men. EU’s legal commitment to gender equality is meaningless if it is not able to ensure that women in all their diversity are targeted and included in this objective. Its second aim is to assess whether migrant women’s associations are considered to be relevant stakeholders by the EU’s financial instruments. This paper finds that the EU falls very short on both objectives.

The EU has not produced gender-specific, disaggregated data, intersected with an indicator for migration status to allow for a thorough assessment of large parts of its budget. From publicly available information, WIDE+ has assessed that the EU has implemented a limited gender mainstreaming approach that has also excluded civil society as meaningful stakeholders in its decision-making processes. Additionally, migrant women’s associations have been very seldom considered in EU’s budget allocations.

This paper reviews the available evaluations of EU funds and budget streams, as well as major policy commitments. This review concludes that migrant women and their associations are not a financial priority. In assessing these funding lines, the paper will also take into consideration the context of COVID-19 and how during this difficult period, there is an even greater need to extend financial support to migrant women associations. It will also briefly highlight the many contributions of migrant women to European societies in providing work, unpaid care and assistance before and during the COVID-19 pandemic. Without the enormous amount of work carried out by migrant women in Europe, societies throughout the region would have been much harder hit.
1. INTRODUCTION

Feminist economic analyses have shown that the budget allocations of governments are deeply political processes that are gendered in nature. Money is a political instrument that increases, sustains, or changes existing oppressive systems of power inequality. Often, government budget allocations are framed as scarce resources to justify limited public spending. In situations of crisis, the political interests behind framing such scarcity become very visible, when huge spending is suddenly possible, such as the enormous amount of public money spent through different methods by European countries to help large transnational banks survive during the financial crisis. This was followed by damaging austerity cuts to public services that increased gender inequalities in the same countries.

Currently during the COVID-19 pandemic, big transnational companies have already received huge amounts of financial support in several countries while there are no provisions to help increase salaries or significantly improve the working conditions of health workers. Feminists see that the most marginalized in our societies are often faced with increased precarity and barriers to health and protection.

Whose needs are prioritised, and under which conditions? And who is taxed and on what percentages of their income? These decisions are a matter of political priorities and not a natural given.

Feminists have been very critical of the treatment of migrants in Europe, especially since European politicians stated that there was a “crisis of migration, with increased numbers coming to the EU in 2015-2016”. Compared to the prior years, there had been more refugees, close to 1.3 million, who entered the region. Still, the total number of people who have arrived is less than half a percentage point of the whole population of the EU. Nonetheless, many politicians have framed the arrival of migrants as a crisis that would (among others) weigh heavily on national budgets and in response, European governments have enacted stricter border controls.

Women make up a significant proportion of new arrivals, yet migration and asylum policies remain “gender-neutral”. These policies have been formulated within the framework of border control and security, not in terms of human and women’s rights (Alam et al., 2019). In addition, it seems that not only the policies relating to migrants and refugees lack a gender-equality perspective. The European Institute for Gender Equality (EIGE) found that education and training policies of the EU and most member states use

---

While the UN’s “Universal Declaration of Human Rights” affirms the equal entitlements of rights to men and women and prohibition of discrimination based on sex, women’s rights are further safeguarded in the international treaty, “Convention on the Elimination of All Forms of Discrimination against Women” (CEDAW). To read more on international human rights standards, including women’s rights, go to: https://www.ohchr.org/EN/Issues/Women/WGWomen/Pages/Internationalstandards.aspx
Marginalizing Migrant Women’s Associations in EU Policies: Tracking EU Funds

a gender-blind ‘one-size-fits-all’ approach, ignoring the different needs of migrant women and men, or what the EU terms as ‘third-country nationals’, in migration and asylum policies (Di Santo & Lombardi, 2019).

The lack of a gender focus in European asylum and migration policies is confirmed by members in the WIDE+ network. A recurrent and common thread mentioned by members and partners in the WIDE+ network is the lack of financial support to migrant women's associations and groups by local, regional, and national governments and by supra-national and international organizations like the EU and the UN. This gap seems to signal that the voices and expertise of migrant women in contributing to the effective protection of migrant women’s rights is not seen as relevant. However, numerous case studies and research relating to migrant women tells us that policies can only be fully effective if they take full account of the different intersections of people's identity and experiences. A gender-blind migration policy is as weak as a gender equality approach that does not consider the effects of racism, ageism, and other systemic forms of discrimination. Addressing intersectionality and contextuality is crucial to effective and efficient policymaking.

One of the key takeaways from a European expert session on the protection of migrant women from gender-based violence, is the need to financially support migrant women’s associations to contribute to the protection of women survivors as well as to the prevention of gender-based violence (Women in Development Europe+ [WIDE+], 2017a). Similarly, a recent review of feminist initiatives in Europe (WIDE+, 2020c) shows that there is a strong argument for allocating more funding to feminist groups, especially to migrant women’s associations and other groups with the unique potential to act as bridges and hubs of expertise to inform policy, but whose voices are much less valued by stakeholders. This finding is also echoed by the European Network of Migrant Women who are calling for more financial support for grassroots migrant women’s groups (European Network of Migrant Women [ENoMW], 2020b).

\[2\] The term “third-country national” is often used in the context of migration, and in the EU’s context, it refers to non-EU citizens who does not have the right to free movement. The definition can be found here: https://ec.europa.eu/home-affairs/what-we-do/networks/european_migration_network/glossary_search/third-country-national_en
WIDE+ defines ‘migrant women’ inclusively and refers to all women who are displaced or who have moved from one country to a destination in Europe, as migrant women. This also includes women from another part of Europe relocating to another country in the region. While migrant women from EU countries have more rights than third-country migrant women3 (or non-EU migrants), both categories of migrant women encounter many socio-economic challenges. WIDE+ defines Europe as the geographic continent that includes the EU but also includes many other countries within the region and it considers migrant women’s associations and groups to be those in which migrant women constitute most of the decision makers. These definitions reflect the perspectives of this study.

The reasons for giving more financial support to programmes and policies that target and mainstream the needs of migrant women are clear. Migrant women face multiple intersecting discriminations in European societies, namely (but not exclusively) within the domains of administration, social care, labour, healthcare, political and civic participation, and justice. There are stark gender inequalities in all these domains and status as a migrant often leads to further discriminations. For example, on top of facing a gender wage gap, migrant women also experience deskilling in European employment markets (Agatiello & Humer, 2018, p.6). They tend to be overqualified for the jobs they take due to barriers accessing labour markets (Agatiello & Humer, 2018, p.6). While waiting for residence permits to be processed, some find work in the informal sector in order to financially sustain themselves and their families, as they are not legally allowed to work. Some end up in highly exploitative and dangerous situations, including the risk of being trafficked.

A major problem for migrant women is the discrimination they encounter when it comes to addressing violence against them, especially in the case of undocumented and refugee women and girls. Case studies shared within the WIDE+ network show the many obstacles, including legal ones, that migrant women and girls face. A 2020 evaluation report for Serbia by the Group of Experts on Action Against Violence against Women and Domestic Violence (GREVIO) urges the government to consider the many obstacles women face when seeking help from the authorities with their experiences of violence (Council of Europe [COE], 2020c, p.6). In another example, a law in Spain on violence against women in domestic situations puts migrant women at the risk of deportation from the country. Migrant women without a residence permit face the possibility of being deported if a claim they made leads to a not-guilty verdict (WIDE+, 2020f). A report by the Council of Europe (Alam et al., 2019) revealed that female asylum seekers who have experienced abuse or violence lack awareness of their rights and information about where to access essential services.

3 There are certain exceptions, such as in Spain where migrant domestic workers have the same rights as national employees and are covered by the country’s social security system - https://www.ilo.org/wcmsp5/groups/public/@ed_protect/@protrav/@travail/documents/publication/wcms_173686.pdf
Nevertheless, this paper argues that it is necessary to recognize the heterogeneity of migrant women and to avoid framing migrant women as mere victims. A narrative that foregrounds migrant women as being part of the solution, as highlighted through the immense work of migrant women’s associations, should inform public awareness as well. Migrant women’s associations and groups are safe spaces for many women where they can turn to for protection or for any other support. There are not many spaces that are easily accessible by migrant women. Migrant women’s associations act, for example, as peers supporting migrant women who are survivors of violence seeking justice and protection, and they also advocate for effective policies and programmes that seek to empower migrant women and girls.

Remittances are another example of the significant contribution migrant women make to societies. Several studies have shown that migrants’ remittances to developing countries exceed official development aid and foreign direct investment (Organisation for Economic Co-operation and Development [OECD], 2019a; Barne & Pirlea, 2019; United Nations [UN], 2019). Despite the numerous obstacles they encounter, migrant women are more likely to send regular remittances, and to send a higher proportion of their earnings than their male counterparts (Le Goff, 2016). Hence, this paper also seeks to widen the discourse surrounding migrant women and advocate for their autonomy, agency, and right to self-organise.

The current COVID-19 crisis has exacerbated migrant women’s vulnerable position in European societies, resulting in increased barriers to protection from violence, reducing access to healthcare and safe adequate housing. It has placed additional burdens on migrant women’s associations to support their communities, while at the same time, governments continue to restrict their means of support.

“Nevertheless, this paper argues that it is necessary to recognize the heterogeneity of migrant women and to avoid framing migrant women as mere victims. A narrative that foregrounds migrant women as being part of the solution, as highlighted through the immense work of migrant women’s associations, should inform public awareness as well.”

Given these cross-cutting contexts, this paper is structured as follows. In Section 2, effects of the pandemic and its measures (or lack of) supporting migrant women across European societies are reviewed. This review concludes that migrant women are excluded from the EU’s proposal for the COVID-19 recovery package. Section 3 provides a brief overview of the EU’s legal and policy frameworks around gender equality and migrant women. Section 4 highlights the key findings of different sources that have examined existing EU funds and budgets and how much of these funds address gender equality and reach civil society organisations (CSOs).
and migrant women’s associations. **Section 5** presents the paper’s concluding remarks, also outlines how EU institutions can support migrant women and their rights.

### 2. COVID-19 AND MIGRANT WOMEN

The global pandemic COVID-19 has affected Europe and the world in such significant ways that it must be considered in this review of funds towards migrant women’s associations. While the virus does not discriminate, the pandemic has affected women, especially migrant women, disproportionately in many ways.

Women have been on the frontline of COVID-19 responses given that women are over-represented in healthcare, education, agriculture and other key sectors globally and in Europe. Global health and social care systems are heavily reliant on women’s labour. As ‘essential workers’, women face the risk of being infected while at work. With the extended closure of schools and childcare services, women also bear the responsibility of unpaid domestic caregiving and teaching duties at home. According to the OECD, even before the pandemic, on average, just 45% of women’s working time is paid, compared to 67% of men’s working time, and only 20% of care work is provided through formalized labour (Klatzer & Rinaldi, 2020, p. 4). The majority of care work is unpaid and informal and for every four persons offering this care, three are women, of whom many are migrant women (Klatzer & Rinaldi, 2020, p. 6). There are also widespread reports on how different types of violence against women and girls, particularly domestic violence, have alarmingly intensified, leaving them with limited ways to escape violence. This has led UN WOMEN to speak of the ‘shadow pandemic’ of violence against women. Also, many women in Europe are facing job losses, which has been a recurrent observation and presents a huge challenge for women among WIDE+ members when assessing the gendered impacts of the pandemic.

The gendered impacts mentioned above are magnified for migrant women, as their status as ‘refugee’ or ‘migrant’ in many cases limits their rights, poses additional restrictions, and increases their vulnerability due to gaps in protection. Several WIDE+ members who work closely with migrant and refugee communities were not allowed to visit refugees in centres as contact with NGOs outside camps was forbidden, leaving the camps unattended. On top of this, migrant and refugee women also reported lack of access to basic health care services or were not able to escape violence as entry to safe housing was further restricted. Echoing this experience, other research found migrant girls and women living in overcrowded dormitories, deprived of safe sex-segregated spaces, having to contend with the escalated risks of sexual harassment and violence. This is on top of high exposure to the virus and having to take care of themselves and others in lieu of proper medical assistance and decent housing conditions (National Integration Evaluation Mechanism [NIEM], 2020).
Migrant women workers are likely to work in informal or under-regulated sectors, which leaves them with no unemployment benefits or labour protection when being laid off, unlike those received by EU native citizens. While EU native citizens are protected by various unemployment and social support schemes disbursed during the pandemic, these provisions are not extended to those who work in informal jobs. At the same time, many migrant women work in domestic and caregiving roles, exposing them to the virus, with little or no access to healthcare services.

During the pandemic, live-in migrant women workers have not only lost their jobs, but also their accommodation (European Trade Union Confederation [ETUC], 2020). For example, in Spain, there are over 630,000 migrant domestic workers, and a significant portion of these women are undocumented (ENoMW, 2020b; WIDE+ 2020e). While Spain is one of the few European countries to have social security provisions for undocumented migrants, many of these migrants do not seek assistance through the formal system for the fear of deportation (Fanjul & Dempster, 2020). The lack of access to social protections, coupled with language and cultural barriers, and poor social networks increase migrant women’s vulnerabilities during the pandemic. Without significant financial support and other economic options migrant women are pushed to consider work under exploitative conditions where they are vulnerable to abuse and trafficking. When strict lockdown measures were eased, some countries like Serbia also saw human trafficking networks quickly returning to business (WIDE+ 2020d).

Sparked by fears of food and labour shortages, governments and farmers across Europe turned to undocumented migrants to harvest crops during the pandemic (Davies, 2020a). Italy, Sweden and Portugal announced measures to grant temporary visas for undocumented migrants as a way to curb labour shortages, especially for the agriculture and care sectors (Fasani, 2020). Europe’s agricultural workers consist primarily of migrants, many of whom are women, and they live on-site in deplorable conditions with no access to proper sanitation, healthcare, and social protection (Moreno, 2020). Migrant agricultural workers are often subject to low wages, exploitative labour practices and face abusive employers (European Federation of Food, Agriculture and Tourism [EFFAT], 2020). However, across Europe, no government has announced measures to specifically aid migrant women workers who are disproportionately represented in precarious
employment situations. Spain has been heavily criticized for not providing safe, hygienic, and decent work conditions for thousands of seasonal women migrant workers from Morocco working on strawberry farms during the pandemic (Davies, 2020b). So far, WIDE+ has not seen any EU or national measures to protect the rights and well-being of migrant agricultural workers during this pandemic.

COVID-19 has also exacerbated incidences of gender-based violence for women. Being confined under stressful conditions, underlined by fears of job and income loss, has led to an increase in the rate of domestic violence. As observed by migrant women’s associations, this rate of violence is magnified for migrant women who struggle with higher barriers to protection. For example, domestic abuse organisations in the UK called for emergency protection for migrant women from the government in the wake of the pandemic (Step Up Migrant Women [STMW], 2020). Even before the pandemic, migrant women were exposed to heightened risks of femicide across Europe as they occupy more vulnerable positions, being often economically and legally dependent on their male partners, and struggle with multiple barriers to justice and social protection (ENoMW, 2019a).

It has also been reported that grassroots aid groups in France and Greece were not allowed to provide food to refugees during the pandemic (Makszimov, 2020). It is important to note that the criminalization of aid by CSOs and volunteers has been a longstanding problem in Europe, even before the pandemic (Amnesty International, 2020). A 2019 report by the Group of Experts on Action against Trafficking in Human Beings (GRETA) expressed concern that in some European countries, strict regulation on funding and activities in civil society hinders their work in human trafficking aid (COE, 2020b, p.35). The report calls on authorities to improve NGOs’ access to funding in order to provide much-needed help for victims of trafficking.

In response to the huge economic impact of COVID-19, the EU proposed large recovery packages to aid member states. A gender impact assessment carried out by the political group Greens and European Free Alliance within the European Parliament found that the EU’s Recovery and Resilience Fund of €750 billion, or the Next Generation EU, is largely gender-blind and will leave women behind (Klatzer & Rinaldi, 2020). This fund is a financial instrument that is aimed at helping EU member states recover from the economic shocks of the pandemic. Despite extensive evidence that COVID-19 has had gendered impacts, the recovery fund is primarily targeted towards aiding male-dominated industries, like construction, energy, and transport (Klatzer & Rinaldi, 2020, p.8).

WIDE+ notes that the fund has a strong emphasis on flexibility and is largely dependent on member states’ own initiatives in allocation. This means that while there is still room for a gender equality perspective to be included, it is not a priority.
Marginalizing Migrant Women’s Associations in EU Policies: Tracking EU Funds

The large pool of funds ignores the fact that the pandemic has put a great strain on sectors like education, healthcare and social work, and accommodation/hospitality and food services – sectors where a higher proportion of workers are women. In Europe, women make up 89% of nursing personnel (WHO, 2019) including migrant women. According to the OECD, a quarter of healthcare workers are foreign-born (OECD, 2020e), with a higher proportion being migrant women. In conclusion, the proposed recovery fund seems to do little to repair the negative impacts of the pandemic on migrant women. If the EU chooses to invest in care infrastructure, it will yield higher employment rates for women, as compared to investing in the construction sector (Klatzer & Rinaldi, 2020, p.6). This can ultimately reduce gender employment gaps and reduce job risks for women but men too (Klatzer & Rinaldi, 2020, p.6).

Conclusion
Migrant women in Europe have been facing more severe gendered impacts of the pandemic, while also being on the frontline of the COVID-19 response. Women play a pivotal role in paid jobs in the health sector and related client-based industries, as domestic workers, cleaners, cashiers, etc. However, most care work is unpaid and informal and is primarily carried out by women of whom many are migrants.

There have also been widespread reports about how various types of violence against women and girls, particularly domestic violence, have alarmingly intensified. In addition,
migrant women have faced increased isolation and precariousness, including lack of access to food and safe housing. And in the longer term, it appears that those without full residence status will not be able to access a publicly funded basic income for living, while many migrant women have already lost their income from work during the pandemic.

In response, the EU has proposed large recovery packages to aid member states that are leaving women behind, especially migrant women. This large pool of funds ignores the fact that the pandemic has put a great strain on education, healthcare and social work sectors, as well as service sectors that provide accommodation, hospitality and food, where a higher proportion of workers are women, especially migrant women. Instead, the EU plans to invest in male-dominated sectors. If there are no further measures, the recovery fund will do little to repair the negative impacts of the pandemic on migrant women.

3. MIGRANT WOMEN AND EU’S MAIN LEGAL AND POLICY FRAMEWORKS

To understand the funding streams that reach migrant women and associations, it is necessary to first look at key legal and policy commitments for the EU and beyond.

Obligations on Gender Equality

The Lisbon Treaty forms the constitutional basis of the EU and includes binding agreements for its member states. It is split into two parts, the Treaty on European Union (TEU) and the Treaty on the Functioning of the European Union (TFEU) that each contain clear gender equality commitments. In the TEU, gender equality is upheld as a fundamental value and is enshrined in Articles 2 and 3. Article 2 of the TEU states that the EU is founded on fundamental values of respect for freedom and democracy where ‘equality between women and men prevail’. Article 3 re-affirms that the EU will ‘promote social justice and protection, equality between women and men’ (Treaty on European Union and the Treaty on the Functioning of the European Union.)

Gender equality as a principle is outlined in the TFEU under Articles 8 and 19. Article 8 outlines the commitment to a strategy of gender mainstreaming to promote ‘equality between men and women in all its activities’ (Article 8, TFEU). Article 79 of the TFEU specifically mentions the need for a common integration policy and fair treatment of ‘Third-Country Nationals’ (ie. migrants), and the prevention of illegal trafficking (Treaty on European Union and the Treaty on the Functioning of the European Union).

Overarching Gender Equality Policy

The EU’s overall gender equality objectives are summarized in its multi-annual EU Gender
Equality Strategy that provides a roadmap for the EU and member states. The European Commission launched its latest strategy for 2020-2025 in March 2020. This broad-based strategy adopts a ‘dual approach’ of gender mainstreaming and targeted action and implementation (EC, 2020r). Very importantly it set out to include an intersectional approach; meaning it recognizes intersecting issues such as increased discrimination that women face because of their gender, religion, ethnicity, and ability. However, the strategy does not provide a specific policy target on migrant women.

EU’s External Relations

When reviewing the EU’s commitments to the whole of Europe, it is necessary to review its ‘Enlargement Policy’ and ‘EU Neighbourhood Policy’ (ENP). Both are vital in governing the bloc’s relations with its neighbouring countries. The enlargement policy focuses on countries like Serbia, Turkey and Albania which are candidates for accession to the EU, also called pre-accession countries. It aims to help these states to meet the necessary criteria for membership, supporting them in implementing the related economic and democratic reforms. The ENP focused on neighbours that are often geographically a bit further removed from the EU like Algeria, Egypt and Armenia as examples. Policy priorities under the ENP include the promotion of good governance, rule of law and human rights (EC, 2020s).

The current EC has so far presented an updated enlargement policy for the Western Balkans, with no specific mention of gender equality, the rights of women or migrants (EC, 2020s). However, Serbia, North Macedonia, Albania and Montenegro have developed their own gender equality indices (European Institute for Gender Equality (EIGE, 2020b). These indices are crucial in deepening the countries’ commitment to gender equality, allowing them to use the findings to guide better policy making in promoting gender equality, including for migrant women. For example, using this set of indices (which has eight domains - power, knowledge, work, violence, health, time, money, and intersecting inequalities), the government of Albania published a report assessing the country’s position on gender equality, including an assessment of policy action and programmes in the domain of work, looking at the integration of migrant women into the labour market (Ministry of Health and Social Protection Albania, 2020, p.12).

The gender equality strategy for the EU’s other external action is reflected in the staff working document, ‘Gender Equality and Women’s Empowerment: Transforming the Lives of Girls and Women through EU External Relations’, in short, the GAP. The previous GAP 2016-2020 (also known as GAPII) has just ended and the EU will publish GAPIII in the second part of 2020. It is a programmatic tool to ensure coordinated promotion of gender equality and women’s empowerment in all its external relations. While migrant women were not highlighted as a specific area of action in the previous GAP for 2016-2020, the needs of migrant women are considered under various thematic priorities such as thematic priority B, ‘Physical and Psychological Integrity’ where gender-based violence
and trafficking are tackled, and thematic priority C, ‘Economic, Social and Cultural Rights’ where access to work and other economic opportunities are addressed (EC, 2019q).

The CSO consultation for the new GAP included a set of questions about priorities for migration policies, which suggest that in the upcoming GAP, migration will be featured more prominently (WIDE+, 2020c).

The EU’s external actions are not often mentioned in public debates, but they represent a significant portion of the EU’s budget. The EU has increased its external relations budget commitments under the Multiannual Financial Framework’s heading ‘Neighbourhood and the World’. This includes funding for the Instrument for Pre-Accession Assistance (IPA), the instrument for neighbourhood, development and international cooperation (NDICI) and many other instruments, amounting to €123 billion in nominal terms (Jones et al., 2018). The EU’s external action constitutes almost 10% of its budget (Jones et al., 2018, p.2). The increase in funding shows how there is an urgency to strategically safeguard, or securitise, its own interests vis-à-vis its neighbours.

Protection of Migrant Women against Gender-based Violence

The EU’s ‘Victims’ Rights Directive’ requires all member states to provide minimum rights, support, and protection to victims. This legal and enforceable instrument makes explicit that this protection of rights includes the rights of migrant women, regardless of their residence status (Directive/2012/29/EU). This year, the EU also adopted its first Strategy on Victims’ Rights which explicitly recognises challenges faced by undocumented victims of crime (PICUM, 2020a). The Istanbul Convention treaty provides further policies for gender-sensitive approaches and measures to protect the rights of migrant women. Interestingly, while this treaty has yet to be ratified by all EU member states (European Parliament, 2018a), many pre-accession
states like Albania and Serbia have done so, and this has become the foundation for these countries’ legislative framework in protecting women against violence. Within the Istanbul Convention, there are specific measures to protect migrant women. For example, under article 59 on the residence status of women, victims of abusive relationships and whose residence permits depend on their partners can be granted autonomous permits (COE, 2019a, p.3). Under article 60, gender-based violence such as female genital mutilation and dowry-related violence, are also recognized as forms of persecution (COE, 2019a, p.4).

EU’s Migration and Integration Policy

The European Commission adopted the ‘Action Plan on the Integration of Third-Country Nationals’ in 2016, providing a comprehensive policy framework to support its member states in their efforts to promote integration, with a strong focus on pre-departure and pre-arrival measures, education, access to social services, employment and active participation in society (EC, 2016b). Within this framework, there are targeted measures for migrant women in the areas of labour, education and basic services (EC, 2016b). The implementation of this Action Plan is funded through various funding streams and programmes, including the Asylum, Migration and Integration Fund (AMIF), the European Social Fund (ESF), Erasmus+ and the Employment and Social Innovation (EaSI) programme (EC, 2016b). There is a renewed action plan underway.

At the same time, the European Commission has proposed a ‘New Pact on Asylum and Migration’, with a strong focus on responsibility-sharing amongst member states and stricter border procedures (Neidhardt & Diez, 2020). The proposal has been criticized as lacking a humanitarian approach and pandering to member states, like Hungary and Poland, which have been reluctant to accept refugees (Bhandari, 2020). The proposal has highlighted the risk of women and girls becoming trafficking victims along migration routes (EC, 2020u), however, migrant women has no specific focus in the proposal.

It seems that migrant women are simply not prioritized in the policymaking of the EU and member states, as was highlighted in the research highlighted in the introduction. In addition, a report by the European Court of Auditors found that most EU member states and pre-accession countries do not have policies in place to specifically support migrant women (European Court of Auditors [ECA], 2018a). This points to the predominant perspective that migrant women have low prospects of integrating, and/or are considered as part of a family unit rather than as individuals, which avoids the need to include policies to support them (Agatiello & Humer, 2018).

Conclusion

In conclusion, the EU has incorporated gender equality values into its legal framework, in which fair treatment of third-country nationals is also addressed. These firm
commitments are not extensively translated into policy in relation to different intersections of women, including migrant women. Overall, a focus on migrant women is not strongly embedded in the EU’s migration and gender equality strategies. The most elaborate and explicit inclusion of migrant women is in the EU’s laws and directives towards eliminating violence against women and girls, with principles of protection for migrant women in the Victims Rights Directive, which are further extended in the Istanbul Convention. The EU’s gender equality strategy does not include migrant women specifically, only as one intersection among others. The expired ‘Action Plan on the Integration of Third-Country Nationals’ included targeted measures for migrant women in the areas of labour, education and basic services, but no gender mainstreaming of its policy.

4. MIGRANT WOMEN, THEIR ASSOCIATIONS AND THE EU BUDGET

The aim of this paper is to assess if migrant women and migrant women’s association are included and given priority in EU budgets. To come to a meaningful evaluation, it is necessary to first ask whether the EU adequately contributes to protecting the rights of migrant women and ensuring that there is equality between migrant women and all men. In this context, we then ask whether migrant women’s associations are considered as relevant stakeholders in EU policymaking who can help to achieve these objectives. This is a review that assesses gender mainstreaming but for migrant women and targeted programmes and projects towards migrant women.

A common experience of women’s rights advocates who monitor public budgets is that gender mainstreaming ends up as a kind of gender ‘out’-streaming in which gender has become an ‘add-on’ element that tends to be forgotten by staff with too little time, awareness, and expertise to thoroughly integrate gender equality. A common experience among gender equality advocates is that budget streams that are targeted at funding gender equality or women’s rights (as the main principle) are effective programmes but they are often funded from a (very) limited budget and are therefore quite ineffective in bringing about change.

If the EU aims to live up to its commitment to be a union based on equality between migrant women and all men, this should be reflected in its budget allocations. One would expect to find traces of mainstreamed and targeted approaches in various financial

5 While the renewed Action Plan has not yet been introduced, the Commission has been gathering input from a wide range of stakeholders through a public consultation and an expert group comprising of civil society, businesses and migrant organisations, and individuals. More information on the upcoming Action Plan here: https://ec.europa.eu/home-affairs/news/20200722_integration-migrants-commission-launches-public-consultation-call-expert-group-migrant-advisers
Marginalizing Migrant Women's Associations in EU Policies: Tracking EU Funds

Instruments. This would mean a) a substantial number of programmes targeting migrant women, and b) the issues of gender or migration as additional objectives being reflected in financial instruments. A few million Euros per year out of a multi-million budget, awarded to civil society organizations to protect the rights of migrant women is not a sufficient indication that migrant women are being included.

Does the EU live up to its gender equality commitments? The short answer is that the EU has not produced gender-specific, disaggregated data, intersected with an indicator for migration status or racism to allow for a thorough assessment of large parts of its budget. That this information is not readily available is an indication that promoting migrant women’s rights and equality is not a high priority in the EU’s budgeting and programming. According to the European Commission, only 11 of the 60 spending programmes in the EU's Budget 2014-2020 had provided some financial estimates related to gender mainstreaming (EIGE, 2020c).

It is possible to assess large-scale budgets on gender equality commitments, as proven by the OECD gender marker that has committed OECD member states, including the EU, to track their budget commitments to Official Development Assistance (ODA) with gender equality as a policy objective. The tool is designed in a way that it can collect annual data from all the member states in a simple and efficient manner, while delivering useful statistical information for further evaluations. The tool cannot, however, provide information at a very granular level; for example, it is not able to allow assessments on how much funding is allocated to gender equality objectives in migration-related projects.

It is impossible within the scope of this paper to provide a comprehensive, intersectional gender audit of the whole EU budget. To carry out such a review would require greater capacity and access to data than what is currently available to WIDE+. But several existing reviews and evaluations led us to conclude with enough certainty that the EU’s financial flows hardly reach migrant women’s associations and that migrant women are a low
priority. The key findings in these reviews were reached by assessing funding to civil society, gender equality and migration and integration programmes in the EU.

The starting point of a review of the EU’s budget is to look at its Multi-annual Financial Framework (MFF). This is a financial planning instrument which allocates resources to the EU’s different policy areas and priorities over a period of seven years. In the past seven years €960 billion was committed and €908 billion was spent (set at the value of the Euro in 2011, excluding technical adjustments) (European Council, 2020).

The European Commission set aside €6.17 billion to fund gender-related programmes as part of its Strategic Engagement for Gender Equality 2016-2019 (EC, 2016c, p.19). Contextualizing this figure to the MFF, this amount makes up a mere 0.6% of its 2014-2020 commitments (Lodovici et al., 2016, p.10). More findings will be discussed in the following sub-sections.

The European Commission has been proposing to further limit funding for gender equality in recent years, showing the lack of priority it gives to gender equality, while the European Parliament and civil society organizations have been calling for an increase.

The EU started developing the MFF for 2021-2027 in 2018. In its first communication with the MFF the European Commission did not mention gender equality at all, apart from two references in the annex and migration was proposed as one of six priorities in combination with border management. Unsurprisingly, no links to migrant women were made (EC, 2018l). In response, the European Parliament adopted a position with a view to agreement in this first draft in which it “deplores the lack of clear gender equality goals, requirements and indicators in the proposals on the relevant EU policies; calls for the annual budgetary procedures to evaluate and integrate the full impact of EU policies on gender equality (gender budgeting); expects a renewed commitment by Parliament, the Council and the Commission to gender mainstreaming in the next MFF, and its effective monitoring, including during the MFF mid-term revision” (European Parliament, 2018b).

Earlier this year the European Commission presented a new draft of the next MFF budget (launched together with the Next Generation EU package) in which it proposed a 20% reduction of the Rights and Values programme under which the targeted gender equality programmes fall (see below). The European Parliament and Civil Society had been calling for a substantial increase of this programme, and the proposed reduction was much contested (among others by 300 NGOs) (Sestovic, 2020). In its latest draft proposal, the European Council withdrew this budget cut and proposed a similar amount as in the previous MFF, but no increase (EC, 2020t). Under the upcoming budget, the Justice, Rights and Values Fund falls under the Cohesion and Values budget line. The external action
programmes falls under Neighbourhood and the World. The ESIF make up a large proportion of the budget directed to economic, social and territorial cohesion, but a substantial part of the budget is also placed under the other two large budget priorities (sustainable growth and jobs). The ESIF includes the European Regional Development Fund (ERDF, approx. €230 billion); the European Social Fund+ (ESF+, approx. €100 billion); the Cohesion Fund (CF, approx. €40 billion); the European Agricultural Fund for Rural Development (EAFRD, approx. €90 billion); and the European Maritime and Fisheries Fund (EMFF, approx. €6 billion). (EC, 2018).

A. The European Structural and Investment Funds

The European Structural and Investment Funds (ESIF) are intended to support the EU’s economic development, including promoting small businesses, rural development, sustainable management of resources and innovation, including digitalization.

There are 11 thematic objectives within the ESIF, including Competitiveness of Small and Medium-Sized Enterprises (SMEs) and Social Inclusion and Educational and Vocational Training which do not include gender or migration issues. The ESIF is the main instrument...
for translating policy objectives and commitments to action on the ground. While gender equality is not a thematic objective, the ESIF could be considered to be the “most important financial support” for gender equality policies in the EU (Lodivici, et al., 2016, p.25) given the huge budget allocated through the fund.

As mentioned above, while the ESIF does not directly promote gender equality through a targeted programme, article 13 of the Common Provisions Regulation (Reg.1303/2013) requires that all stages of implementation of the funds must ‘aim at eliminating inequalities and at promoting equality between men and women and integrating the gender perspective’ (Reg.1303/2013). In addition, including gender equality is an ‘ex-ante conditionality’, meaning that including gender equality in the use of the funds is a pre-requisite. While the 2018 Common Provisions Regulation proposal for the upcoming MFF 2021-2027 has removed gender equality as an ex-ante conditionality (EWL, 2019), it is still considered as a horizontal principle. Under article 6 of the proposal, in implementation of funds, member states must involve partners to promote gender equality.

A report by the European Institute of Gender Equality concluded that less than 1% of the ESIF between 2014-2016 were set aside to promote gender equality (EIGE, 2018a). There are a few examples of projects targeting migrant women through one of the funds. The European Social Fund (ESF) has funded numerous projects to support job-related efforts or projects to enhance migrant women’s entrepreneurship skills (European Web Site on Integration [EWSI], 2018). Many initiatives support the language and civic integration courses that are aimed at giving them skills to go back into the labour market.

The argument that there is a lack of funding for gender equality is also supported by a report from the European Parliament’s Policy Department for Citizen’s Rights and Constitutional Affairs, which found that even if the overall ESF budget for 2014-2020 had increased from previous years, this budget spends less on gender-sensitive areas (Brodolini, 2012, p.44). This is part of a longer-term trend. When comparing previous budget cycles (between 2000-2006 and 2007-2013) where the ESF budget had increased by 17% from the previous budget term, 34% less resources went to gender equality action (Brodolini, 2012, p.44). While the ESF budget is allocated through member states and regions, its diminished lack of focus on gender equality suggests that any programmes for migrant women will have also diminished.

B. The Justice, Rights and Values Fund

The Justice, Rights and Values Fund incorporates gender equality programmes through the Rights, Equality and Citizenship Programme (REC) (EC, 2017g), among other rights-

---

based programmes that are also relevant to gender equality targets. The REC programme includes calls for civil society organisations and other stakeholders to act as partners in protecting women’s rights (EC, 2018h). In recent years the REC called for proposals to prevent and combat all forms of violence against children, young people and women and in some years, additional proposals around gender-based violence (GBV) have included projects that target migrant women. It also offers other programmes to support citizenship and human rights which could promote migrant women’s rights and include CSOs as stakeholders in the EU’s implementation. According to a mid-term review of the Rights, Equality and Citizenship (REC) programme for the first part of the MFF cycle (2014 to mid-2017) the programme was able to contribute effectively to gender equality objectives, though not enough to realize structural change (EC, 2018k). Of the whole programme, 40% was allocated to non-profit associations (EC, 2018k, p.8). It was also concluded that the programme “does not seem to capture the needs of people suffering from multiple disadvantages, as the specific objectives do not support synergies and actions for groups falling under two or more of them” (EC, 2018k, p.11). The review also stated that for smaller NGOs it was very difficult to participate in projects because of the co-financing requirement (the EU often requires a percentage of 20-30% in additional financing).

A report by the Women’s Funds Europe (2019) found that between 2014-2016, 35% of the REC funds were intended to meet two primary objectives - gender equality and violence against women (under the Daphne strand) (Weisblatt & Charhon, 2019 p.20). Thus a considerable minority prioritized gender equality within the REC’s thematic focuses. In addition, in 2015, 15 of the 66 beneficiaries were women’s/feminist organizations and in 2016, only 16 out of 99 beneficiaries were women’s/ feminist organisations. It is clear that the financial flows did not prioritise reaching women’s associations, despite dedicated funding that is specifically relevant to their work in advancing gender equality and promoting women’s rights.

WIDE+ has not found a systematic review of the REC calls to third parties for project implementation, in order to shed light on the percentage of migrant women’s associations receiving funds for such projects. WIDE+’s own review shows that recent REC calls
included some projects that aim to address GBV faced by migrant women. WIDE+ came to this conclusion through reviewing abstracts of approved projects under the annual REC call for proposals to prevent and combat all forms of violence against children, young people and women (project summaries of 2017-2018 are available online) and previously around GBV (summaries of two calls in 2016 are available). However, most of these projects are implemented by NGOs and institutions that do not have women’s rights as their main objective. In addition, only a few include partnerships with migrant women’s associations. Projects that include migrant women and/or women’s associations in their partnerships more often adopt an intersectional approach in which they target and prioritise migrant women and girls. To see details of WIDE+’s review, see Annex A.

The review shows that a focus on migrant women and inclusion of migrant women’s association is limited and uneven. In 2016, there was one proposal that prioritized migrant women and in 2017, there were four. In 2018 none of the abstracts of the approved projects considered migrant women and girls as a relevant target group to be clearly outlined as an independent target group, separate from other groups. The abstracts hardly indicated any awareness of the gendered nature of GBV. For example, the proposal INHeRE “aims to improve holistic care for migrants, applicants of international protection (AIPS) and refugees (MAR) who have been sexually victimized (SV) and/or sex trafficked (ST), regardless of their sex, gender, sexual orientation, legal and/or protection status,” (EC, 2019m, p.45). The largest amount went to a project coordinated by the IOM that had as its main objective to improve reaching out to migrant communities, with no mention of a gender perspective in their abstract (EC, 2019m, p.49) which seems to inaccurately suggest that there is no gender-specific impacts of GBV.

Our review also found that between 2016-2018, €492,000 was allocated to migrant women-led associations, €901,000 was allocated to women’s associations or those with gender equality as the main objective, and €6,621,000 was allocated to institutions or associations that were not representing migrant women nor had a main focus on gender equality. Around 6% of all the funding in the calls targeting migrants was allocated to migrant women’s associations as stakeholders, which amounts to around 1.5% of the overall budget for the given period. It also shows that a big majority of the funding allocated to projects around addressing violence intersected by migration are implemented by institutions and associations that do not represent migrant women nor have a main focus on gender issues.

The review also shows that in 2018, there were much fewer women’s (migrant) associations involved in the selected projects, which seems to have contributed to a lack of awareness that sexual and GBV is mostly experienced by migrant women and girls and that an effective approach is based on realizing the gendered nature of this violence. In 2017, three of the four projects that included women’s (migrant) associations also clearly acknowledged the specific context and experience of migrant women, by directly targeting migrant women in their project.
A further analysis of this budget stream within the REC as well as other budget streams would be required to assess if the conclusion drawn from the review of the REC call also apply for other calls, namely that a limited number of target issues around gender intersected with migration and that migrant women associations are the least considered stakeholder, receiving the lowest percentage of funding for implementing such projects that are primarily implemented by institutions and associations.

C. Asylum, Migration (and Integration) Fund

The Asylum, Migration and Integration Fund (AMIF), which has been renamed as the Asylum and Migration Fund (AMF) in the current MFF term, promotes the implementation, strengthening and development of a common approach to asylum and immigration based on EU values. Since gender equality is one of the fundamental values of the EU, all AMIF-funded programmes should have robust gender considerations, but this does not seem to be the case. In the second edition of the regulation document of AMIF, where migrant women and girls are considered, they are merely regarded as part of a vulnerable group of third country nationals (EC, 2017e, p.119).

In 2019, there was a call for applications by the European Commission, which made available €4 million for ‘Social and Economic Integration of Migrant Women’, a funding pool under AMIF which NGOs and public bodies could apply for (Guardia, 2019). But to date, there is no information on the beneficiaries or partnerships that resulted from this.

In continuing to investigate the extent to which AMIF reaches women's groups or focuses on gender equality, the WFE report (2019) found that within the period 2014-2017, only 10 out of 42 programmes under AMIF had a gender equality objective (Weisblatt & Charchon, p.32). Even with this evidence, a lack of gender-disaggregated data and information on beneficiaries and target groups makes it hard to determine whether sufficient funds from the current AMIF reach migrant women associations and migrant women.

Underlying this assessment is a concern about the continued ignorance of the multifaceted challenges that migrant women face. A review carried out by EIGE (2019) on the Draft Regulation for the upcoming AMF concluded that there could be decreased commitment to gender equality and mainstreaming; this particular document (the draft regulation) does not provide specific references to women which means that it is likely that there will not be targeting funding for migrant women (Di Santo & Lombardi, 2019, p.19).

The European Network of Migrant Women published a report, ‘Follow the €€€ for Women and Girls: Addressing the Needs of Migrant Women and Girls in Asylum Migration and Integration Fund (AMIF)” in 2020 and made the same conclusions that there is a lack
of gender mainstreaming in AMIF projects and grassroots migrant women organizations are not necessarily encouraged to be lead project partners.

D. EU’s External Action

The EU’s external action includes enhanced gender mainstreaming efforts along with other targeted instruments (EC, 2019q). Regarding the intersection of gender and migration, the EU reported only one programme focusing solely on migrant women in its 2018 annual review. The EU had provided €25 million for the ‘Safe and fair’ programme in 2017, to improve the working conditions of female migrant workers going to the Gulf countries from Southeast Asia (EC, 2019q, p.64). There are several initiatives where migrant women are an intersecting issue or target group that did receive support, like the project ‘ComVoMujer’ to combat gender-based violence in Latin America, and the partnership with Migrant Women Association Malta (EC, 2019q). The EU also supported actions to promote women’s rights and gender equality as well as migration and integration programmes in countries outside the EU, but WIDE+ could not find further information on how the EU targets migrant women.

The EU’s external action is evaluated by the EU through its own gender markers for which the EU has set as goals that at least 85% of the EU’s official development aid (ODA) has gender equality as a significant or principal objective and 20% of these funds must have gender equality as a principal objective (measured as a commitment in the proposal for a project). Projects with gender equality as a principal objective are those that target gender equality objectives; if a project has gender equality as a significant objective, it means that there is an explicit gender equality component. According to the EU’s own evaluation for 2018 68% of EU aid projects had gender equality as a significant or principal objective in new projects and programmes, which is an increase from 52% in 2015 (EC, 2019q, p.36). For example, in 2018, 55.05% of the projects under the Enlargement and Neighbourhood policy targeted ‘significant’ or ‘principle’ action for gender equality, an increase from 43.13% in 2017 (EC, 2019q, p.79).

The OECD DAC suggests the following examples of activities that could be “marked as significant objective: -- activity which has as its principal objective to provide drinking water to a district or community while at the same time ensuring that women and girls have safe and easy access to the facilities; -- a social safety net project which focuses on the community as a whole and ensures that women and girls benefit equally with men and boys” (from OECD, 2019, p.3).
The EU also provides data towards the OECD for its gender markers. The 2019 OECD DAC report assesses 2016-2017 the year for which the EU provided information for the whole budget. It concludes that 47% of EU Aid is committed to gender equality as a principle or significant objective, with less than 2% of the budget targeting gender equality as a principle objective (OECD, 2019c). Overall, the budget commitments to targeted gender equality programmes remains very limited and is not increasing a lot over time, while the data shows a significant increase in project that include a gender equality aspect (OECD, 2019c).

The difference between the EU and OECD figures is probably in that the OECD measures percentages of funding commitments in US dollars, while the EU counts the number of (new) programmes that include or exclude gender equality commitments without looking at percentages of financial allocations. The OECD gender marker will be therefore more accurate, as it is able to weigh more precisely different elements of projects that target gender equality. The EU marker will qualify a large or small allocation to gender equality in a project equally.

There are specific programmes relating to migration within the external relations budget, though not as prominent as gender equality. And there is no evidence that gender equality and migration objectives are systematically analysed to allow for an intersectional approach. For example, it is a focus within certain trust funds of the EU’s external relations budget, like the EU Emergency Trust Fund (EUTF) for Africa, which aims to address ‘irregular migration and displacement issues’. A report looking at how gender mainstreaming has been incorporated into this financial instrument (Cascone & Knoll, 2018), concludes that even if EUTF for Africa projects include gender considerations and address gender inequalities, overall, the approach in planning and implementing programmes lacks comprehensiveness in deepening commitments to gender equalities (p.29).

Caution must be applied when interpreting data that reflects gender mainstreaming (that include gender equality as an aspect). There is a risk that the gender marker becomes a ‘tick-box’ exercise, in which gender equality objectives are ‘mainstreamed’ in order to make the project look better. Gender equality inclusion should be based on a relevant analysis that will include a gender equality perspective, not only at the start of the project but integral to the design, implementation and evaluation. The gender marker does not measure outcomes. The figures should not be taken at face value as the final score for gender equality, they should also be viewed through qualitative project and process evaluation.

In terms of external action, a 2017 independent analysis of the EU’s evaluation of the Instrument for Pre-Accession Assistance (IPA) in Western Balkan countries by the Kosovo Women’s Network and Kvinna till Kvinna Foundation found that little gender analysis is
carried out when evaluators assess the IPA (Farnsworth & Banjska, 2017). This points to the lack of importance given to targeted gender equality actions in IPA funding, despite the importance of promoting gender mainstreaming highlighted in GAPII. Instead, it was found that there was a “fundamentals first” approach where focusing on the rule of law and fighting corruption were prioritized (Farnsworth & Banjska, 2017, p.5). In addition to the low priority given to achieving gender equality objectives, the report (2017) also found that there are weak capacities at national level in both understanding and applying gender mainstreaming to IPA programming (p.7).

The EU’s external action has made some progress in meeting gender equality objectives, though not sufficient to match the EU’s commitment to gender equality. There is no evidence to suggest that the EU has developed an intersected approach that reaches migrant women or has set up a targeted programme. As discussed in this subsection, there are a couple of examples of such projects to be found.

E. Lack of funding going to NGOs

In looking at the various funding streams and how they have (not) reached women’s organizations, in general, it has been found that NGOs are not the main beneficiaries of EU funding. This is discordant with the EU’s partnership principle, which outlines the obligation of EU institutions and member states to adopt inclusive engagement practices (PICUM & ECRE, 2020b). This principle asks governments to involve multiple stakeholders when it comes to implementing and programming funds. The belief underlying this principle is that NGOs are valuable partners who can extend effective support, especially as they work closely with marginalised populations like migrant women.

This partnership principle has not translated into substantial funding going towards NGOs. A 2018 report by the European Court of Auditors revealed that only 1.7% of 2014-2017 EU budget allocation went to NGOs, and these funds were mostly for external action (p.5). This point is also raised by the European Economic and Social Committee (EESC) who have urged the EU to improve access to funding for small CSOs and the most marginalized in society (Roirant, 2017).

“\nIn this context, the current pandemic is expected to negatively affect the ability of smaller NGOs to compete for EU funding. COVID-19 presents greater challenges to NGOs as they cannot physically engage with communities while the burden of care is increasing.\n”

It has also been found that EU funds are mostly disbursed to large entities like government agencies, and do not reach women’s organizations (Weisblatt & Charhon, 2019, p.5). For instance, under the Rights and Values Funds, of the 99 groups that received money from this funding stream in 2016, only 16 were women’s organisations or organisations with a
main focus on gender equality (p.21). CSOs, in particular the smaller NGOs, have difficulty accessing these funds because they have lower budget and administrative capacities to manage the whole funding process. Often the financial criteria that the EU imposes excludes such NGOs from successfully qualifying for funds. Further assessments of the EU’s instruments are needed to reveal how much funding from their open invitations to third parties include migrant women's associations.

OECD-DAC data also shows that in 2018, the percentage of EU’s ODA going through CSOs is 11% (OECD, 2020d p.15). This type of funding (through CSOs) refers to funding used to implement donor-initiated projects and not for CSOs’ core support. Out of this figure, none of, or any insignificant amount of the ODA reached women’s organisations. This strongly suggests that women CSOs are missing out from ODA flows despite the effective work they do with very little resources in protecting women’s and girls’ rights, and more.

Austerity measures from a decade ago reduced funding for women’s groups that deal with gender-based violence and human trafficking, as governments cut back on care and health services, and support for gender equality projects (European Women’s Lobby[ELW], 2019). This means that a lack of funding has been an issue for many years.

In this context, the current pandemic is expected to negatively affect the ability of smaller NGOs to compete for EU funding. COVID-19 presents greater challenges to NGOs as they cannot physically engage with communities while the burden of care is increasing. Members and partners of WIDE+ reported an increased workload in migrant women’s associations and others working with migrant women in recent months as they have also been providing essential support such as food.

Despite the gaps in data in tracking funding across different types of NGOs, taking into account all of the available evidence, it has become clear that there is a lack of funding of women’s rights organisations, and that even fewer funds are reaching migrant women’s groups.

5. CONCLUSION AND RECOMMENDATIONS

‘Nothing About Us without Us’, is a statement often made by women of different ethnicities addressing decision makers within governments and other financially powerful institutions such as transnational corporations. In the context of the Black Lives Matter movement, this statement has gained additional resonance and approval among segments of society across Europe. It is not only a moral appeal, but also an argument to make policies more effective. This approach will add relevant knowledge, networks, and insights to policymaking; without such knowledge, policies might be less effective or even
counterproductive. It is smart policymaking to include migrant women as part of solutions to current problems. But this has not been the case for the EU.

Migrant women in Europe have been facing more severe gendered impacts given their caregiving roles on the frontline of COVID-19 responses, providing ‘essential’ work. In addition, there have been widespread reports about how various types of violence against women and girls, particularly domestic violence, have alarmingly intensified. During this period, migrant women have faced increased isolation and precariousness, including lack of access to food and safe housing. And in the longer term, it appears that those without full residence status will not be able to access a publicly funded basic income for living, while many migrant women have already lost their income from work during the pandemic.

Without a doubt, migrant women in Europe have been prominently on the frontline of the COVID-19 response. They play a pivotal role in paid jobs in the health sector and related client-based industries, as domestic workers, cleaners, cashiers and more, in unpaid and informal sectors. However, a recent gender impact assessment of the EU large recovery package to aid member states suggests women will be left behind, as it seems to prioritize investment in male-dominated sectors. It appears that migrant women are among the first to be marginalized, while being hit harder by the pandemic compared to other women.

Without any effective gender mainstreaming of the EU recovery packages, our fragile economic systems, which are highly dependent on the care sector and the unpaid and informal care work carried out by many women, will not be sustainable. And gender equality will take a backward step. Migrant women are an essential group of workers (formal, informal and unpaid) providing care and services during the COVID-19 pandemic and they will be throughout the recovery. Without the contribution of migrant women in Europe, its societies would have been much harder hit. European leaders should start recognizing the contributions of migrant women to their societies.

Big transnational companies have already received huge amounts of financial support in several countries while there are no provisions to help increase salaries or significantly improve the working conditions of health workers, or to give basic support to migrants
without permanent status. This once again proves the observation by feminist economists that government money is a political instrument that increases, sustains or changes existing oppressive systems of power inequality. And currently it is not used to create a ‘new normal’ of caring and wellbeing in our economies.

What does our review show in response to the main questions?

- Does the EU adequately contribute to protecting the rights of migrant women and ensuring that there is equality in allocating its budget between migrant women and all (migrant and non-migrant) men?
- Are migrant women’s associations considered to be relevant stakeholders by the EU’s financial instruments?

Our conclusion is that the EU falls very short on both objectives. The EU has not produced gender-specific, disaggregated data, intersected with an indicator for migration status to allow for a thorough assessment of large parts of its budget. Though it is clear from all other available information that the EU has not included a gender mainstreaming approach that takes account of institutional racism. Nor are migrant women’s associations really included as stakeholders in its budget considerations.

All in all, we found that in recent years, the EU has allocated some funding to migrant women’s associations in Europe (EU and neighboring states). Based on our review, we estimate that for the previous seven-year budget, the amount implemented by migrant women associations would have been in the millions at most, but not reaching tens of millions. For a total EU budget that is reaching €1 trillion, this is a negligible percentage. We base this figure on concluding that an amount of roughly €500,000 was implemented by such associations in the REC call around violence. Secondly, there was also a €4 million call in the AMIF fund targeting migrant women, which we assume will also lead to the inclusion of some migrant women associations in the implementation. And perhaps there have been other projects that have included migrant women’s associations. Finally, we found that there are examples of projects targeting migrant women in the budget for external relations, but also, we found that a very low percentage of the budget is implemented by women’s associations thus we expect implementation by women’s migrant associations to be even lower.

The EU has firm commitments to gender equality values enshrined in its legal constitution, in which fair treatment of third-country nationals is also addressed. But a gender-equality approach is not firmly rooted in its policy and budget cycles.

“The EU has firm commitments to gender equality values enshrined in its legal constitution, in which fair treatment of third-country nationals is also addressed. But a gender-equality approach is not firmly rooted in its policy and budget cycles.”
majority of EU’s financial programmes and instruments appear gender blind in their budgets and assessments. The EU’s largest financial instrument, the ESIF, is legally committed to gender mainstreaming. However, a report by the European Institute of Gender Equality concluded that less than 1% of the ESIF between 2014-2016 was set aside to promote gender equality (EIGE, 2018a). There are a few examples of projects targeting migrant women through one of the funds. Overall, the European Commission set aside €6.17 billion to fund gender-related programmes as part of its Strategic Engagement for Gender Equality 2016-2019 (EC, 2016c, p.19). Contextualizing this figure against the MFF, this amount makes up a mere 0.6% of its 2014-2020 commitments (Lodovici et al., 2016, p.10).

We conclude that there is a gap in implementing policies that intersect gender equality with migration. The EU aims for an intersectional gender equality approach, but we could not find any recommendations towards migrant women in key strategies for the policies concerning gender equality in the EU and external relations. Similarly, EU’s migration policies are mostly gender-blind. For example, within the period 2014-2017, only 10 out of 42 programmes under AMIF had a gender equality objective (Weisblatt & Charchon, p.32). The most elaborate and explicit inclusion of migrant women, taking into account their specific situations, is in the EU’s laws and directives towards eliminating violence against women and girls, with principles of protection for migrant women in the Victims Rights Directive, which are further extended in the Istanbul Convention.

A big gap in developing an approach that helps to improve the situation of migrant women is the lack of gender-specific, disaggregated data, intersected with an indicator for migration status produced by the EU to allow for a thorough assessment of large parts of its budget. That this information is not readily available is an indication that promoting migrant women’s rights and equality is not a priority in the EU’s budgeting and programming.

In looking at the various funding streams and how they have (not) reached women’s organisations, in general, it has been found that NGOs are not the main beneficiaries of EU funding. This is discordant with the EU’s partnership principle, which outlines the obligation of EU institutions and member states to adopt inclusive engagement practices (Platform for International Cooperation on Undocumented Migrants [PICUM], 2020). A 2018 report by the European Court of Auditors revealed that only 1.7% of 2014-2017 EU budget allocation went to NGOs, and these funds were mostly for external action (ECA, 2018b, p.5).

Our own assessment of REC funding for addressing sexual and gender-based violence between 2016 and 2018 found that around 1.2 % was allocated to migrant women’s associations, in total roughly €500,000. In contrast €6,621,000 went to institutions or associations that were not representing migrant women or lacked a focus on gender equality for implementing project on the intersection of this violence with migration. Our
review that projects on this particular intersecting that were being implemented by coalitions that lacked women’s (migrant) associations in their midst, did not display a strong gender awareness of GBV, or did not acknowledge migrant women as an explicit target.

Finally, we found that financially smaller NGOs are faced with barriers to accessing EU funds, especially in regard to the co-financing principle. We expect this is also a very relevant barrier that migrant women's association face.

**Our Recommendations**

The EU should not leave women behind in their COVID-19 recovery packages, especially not migrant women who seem to be among the first to be left out in EU policies. We call on the EU to:

- Undertake gender impact assessments and gender budgeting for all funds spent in the framework of the Recovery and Resilience package and encourage member states to do the same.
- Rebalance the focus of the packages towards more investment in the care economy. And encourage developments towards resilient care services and schools that allow all carers to maintain paid jobs and a healthy life balance, such as parents, and adult children taking care of their elderly, etc.
- Initiate new policy initiatives to better protect the rights of migrants to decent work and social protection when providing seasonal, domestic work and other forms of irregular work, of which many are migrant women.
- Set up targeted funding lines to provide basic income and support to migrant women that are not able to access safe housing, food, sanitation, etc.

The EU should include migrant women and migrant women's associations in MFF and annual budget cycles. We call on the EU to:

- Promote and create a tool for tracking the whole EU budget on not only Gender Equality, but also intersected with different groups of women, including migration status, age, disability, LGBTQI-identity, etc. This tool should be used for gender impact assessments at all stages of planning and implementation of EU budget instruments and programmes.
- Enforce the Partnership Principle which requires EU institutions and member states to have a formal obligation to adopt inclusive engagement practices – this means ensuring that CSOs are meaningfully included in planning processes.
- Specific budgets or funding strands can be earmarked and be further simplified for women’s rights CSOs, especially migrant women-led associations - the EU can set up funds that enable financially smaller NGOs to apply, through adjusting the
Marginalizing Migrant Women’s Associations in EU Policies: Tracking EU Funds

administrative burden and co-financing principle. Since EU-level funds are based on calls for proposals, the complex bureaucratic procedures of these funds prevent smaller organisations (which many migrant women associations are) from applying.

- Develop and adopt an intersectional gender equality approach that is intersected with institutional racism and that is visible in the budget allocation. It should ensure inclusivity and that no one is left behind.
- Increase the number of programmes and funds towards the empowerment and protection of migrant women’s rights.

By considering the various issues raised in this paper and working towards solutions to address them, the EU Commission and EU Parliament will ensure that fundamental gender equality values enshrined within EU’s treaties can be honoured. There is also an urgent need to prioritise migrant women in policymaking as they grapple with several layers of discrimination and disadvantages across European societies. Migrant women's associations are also in a better position to build solidarity networks and safe spaces, yet they are not receiving sufficient EU-level funds to support their work. This has to change, and the way forward needs to include and develop sustainable partnerships with migrant women. In all, more intersectional and gender-responsive policy actions can decrease risks of violence and exploitation, increase agency and empowerment, and ultimately transform migrant women’s lives and experiences across the region and beyond.

References

Marginalizing Migrant Women’s Associations in EU Policies: Tracking EU Funds


 Marginalizing Migrant Women’s Associations in EU Policies: Tracking EU Funds

- European Commission (2020u, September). *Communication from the commission to the European Parliament, the council, the european economic and social committee and the committee of the regions: On a new pact on migration and asylum.* Retrieved from https://ec.europa.eu/info/sites/info/files/1_en_act_part1_v7_1.pdf
Marginalizing Migrant Women’s Associations in EU Policies: Tracking EU Funds

Marginalizing Migrant Women's Associations in EU Policies: Tracking EU Funds

• Organisation for Economic Cooperation and Development. (2020e).
• Regulation 1303/2013 of the European Parliament and of the Council of 17 December 2013 laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European


### 6. ANNEX

**WIDE+ Review of the REC calls around Gender Based Violence 2016-2018**

Four calls for 2016, 2017 and 2018 have been reviewed, assessing which amounts go to projects that target violence with migration and assessing how much money was allocated to migrant women associations and associations that primarily focus on gender equality or are women's associations. To assess if an association was a (migrant) women's association, the website of all the partners and coordinators of the specific migrant-related projects were reviewed. This review entailed reviewing information on the association's website, reading their mission statement and introduction.

#### 2016

There were two calls, a smaller one of two million Euros for four projects and three were put on a waiting list to receive funds. The call was titled: 'A proposal to educate and raise awareness of girls and boys about gender-based violence and to prevent it at an early stage' (EC, 2018h). The second one ‘Action grants to educate and raise the awareness of girls and boys about gender-based violence as a way to prevent it at an early stage’ was a call for €4 million (EC, 2018i). Nine proposals were accepted, two were put on the waiting list. For this review it is assumed that the ones on the waiting list, were the last abstracts in the overview of approved projects.

Of the 13 projects that were accepted for both calls, there was one project that focused on refugee women which received €697,000 from the EU, which is 17% of the total budget available in the calls. This project had nine project partners, two of these partners were women's migrant associations: SOLWODI Germany and the European Network of Migrant Women. One partner is a women's association (G.I.R.A.F.F.A. Gruppo Indagine Resistenza alla Follia Femminile Ah! Onlus). While no further information is available on the division of responsibility and of the budget, for the purpose of this evaluation €155,000 Euros of the total project budget is assumed to be allocated to migrant women's associations and €77,000 Euros is assumed to be allocated to women's associations.

#### 2017

A review of the accepted project proposals in the 2017 (EC, 2019m) budget round showed there was a specific sub-priority for projects as follows: ‘the coordination and/or adaptation of support services for sexual and gender-based violence to include refugees and migrants (children, women, LGBTI persons, men and boys)’. Around 28% of the total available budget of €12,7 million was allocated to projects that intersected violence with migration, which amounted to seven of the 35 approved projects. The sum of €337,000 Euros was allocated to migrant women's association and €696,000 was allocated to associations prioritising or focusing primarily on gender equality or
women’s rights. In total 32 coordinators and partners received funds for migration related projects.

Funds were allocated as follows:

- €242,000 to a project led by Centre for European Constitutional Law and partners
- €495,000 to a project led by Medicins du Monde
- €508,000 to a project led by Hope for Children (HFC) that included one organisation with a focus on gender equality, the Gender Alternatives Foundation in Bulgaria that received €54,000
- €570,000 to a project led by Kentro Gia Meleton Kai Ereyvnon Astiki Mi Kerdoskoiki Etaireia. The coordinator is a women’s association that received €204,000. One of the partners in this project, Kentpo Gia Thematia Isotitas Kethi, an association primarily focused on gender equality, received 141,000 Euros
- €363,000 to a project led by the Association Italia Donne per Lo Sviluppo, of which €217,000 went to the coordinator, an association that primarily focuses on freedom of choice for women and girls in the world. Another partner in this project is the Women’s Rights Foundation in Malta, which received €70,000
- €436,000 to a project led by Groupe pour l’Abolition des Mutilations Sexuelles féminines (association located in Belgium which fights to eradicate Female Genital Mutilation, set up by a migrant woman) received 204,000 Euros, with FORWARD, an African women-led organization in the UK receiving €133,000
- €1,3 million to a project coordinated by International Organization for Migration Including Le monde selon les femmes in Belgium, a women’s organization receiving €10,000.

2018
A review of the last round of approved projects for which data is available, shows that in the 2018 budget round there was a specific sub-priority for projects related to: ‘the coordination and/or adaptation of support services for sexual and gender-based violence to include refugees and migrants (children, women, LGBTI persons, men and boys)” (EC, 2019n) as was the case the year before. In total, around a quarter of the total available budget of €13,3 million was allocated to projects that intersected violence with migration. This were five projects of the 38 projects approved. The five selected projects provided a relatively large amount of funds to big institutions. The same call but for 2020 suggested that the average amount given to a project is around €300,000, which is (much) lower than the amounts allocated to these five projects in 2018 (EC, 2018j).
There were in total 26 partners and coordinators of which two associations mainly focus on women’s rights. In total, they received €128,000 (a refuge in Luxemburg to protect women and girls from violence that received €77,000, and a refuge in Germany that received €51,000). No migrant women’s association was included in these projects either as a partner or as a coordinator.

Funding was allocated as follows:

- €786,000 to a project led by Medecins du monde
- €846,000 to a project led by the University Gent
- €417,000 to a project led by Oxfam Italia
- €1,031,000 to a project led by the International Organization for Migration
- €342,000 to a project coordinated by Universitätsstad Marburg.