

WIDE+ Feedback to Call for Evidence EU Gender Equality Strategy 2026-2030

About WIDE+

Women In Development Europe+, in short WIDE+, is a **European feminist network** of feminist activists and organizations, women's rights advocates, gender specialists, migrant women associations, as well as other NGOs that promote an intersectional feminism as part of their overall goal of promoting human rights and sustainable development. It works through interlinked strategies of analysis and capacity building, encouraging innovative movement building through creating spaces for exchange and collaboration or fostering participation in existing spaces, and advocacy towards the EU and European countries on a range of topics.

The network reaches out to 400 associations, through its national platforms and other members organisations that are networks in themselves. Its formal membership includes thirty-one associations that are formally registered in European countries, of which twenty-two registered in fourteen EU member states. There are thirty-two individual members. WIDE+ also brings together partner organisations and individuals in its working group - in particular, the gender and migration working group - which accounts to 12-15 partner associations. And it is part of several alliances as well as currently one consortium, leading to a broader reach to other civil society and institutions.

For more about WIDE+, we would like to suggest our **website: <http://www.wideplus.org>**. The feedback here provides answers on behalf of WIDE+ to the call for evidence in the context of the online consultation towards a new Gender Equality Strategy 2026-2030. It was prepared in August 2025 by Gea Meijers, WIDE+ General Coordinator, through bringing together the evidence and recommendations from various projects and working groups.



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Introduction

The current geopolitical context is becoming increasingly uncertain and that enhances a diversity of risks that could materialize in Europe and elsewhere. These vary from a risk to becoming part of violent conflict or war, increased climate disasters, and the threat thereof, economic recession, and societal shutdown due to problems with the digital infrastructure connected to many provisions in daily life to mention a few that could have huge impacts.

Within Europe we see a growing political instability that interacts with a seemingly growth of distrust among people to those with other views as well as an increased xenophobia; there is a polarisation among populations of European countries, at least politically.

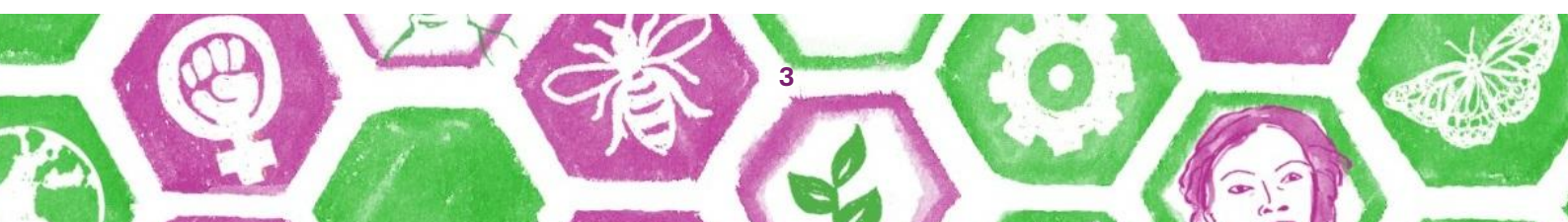
We believe that to counter these threats there is a strong need for **a reliable political and governing transnational leadership that can set out a course towards stability based on sustainable economic growth and protection of human rights.**

As a European feminist network, we fully endorse the overall political project that is embedded in the European Union. Our objective here is to provide evidence-based feedback that connects with EU's current direction.

After the previous elections of the European Parliament the focus on enabling economic competitiveness has increased. We want to make the argument that **the prospect of further economic advantage of the EU lies in the combination of environmental, human rights and labour standards with macro-economic policies that balance reproductive and productive economic activities.** There is no better time to work on inclusiveness and more equality as when the economy faces more uncertainty. The research of different multilateral institutions, such as the [World Bank Group](#), have confirmed the relation between promoting gender equality and economic growth. The in-depth research and publications by Thomas Piketty also led to a similar conclusion but not only linked to gender: economic growth is only on the long term sustainable if it does not increase socio-economic inequality too much. There is no automatic trickle-down effect of economic growth proven as suggested by a neo-liberal approach to economic growth.

An approach of **fostering sustainable economic competition depends of 'fair' and trustworthy rules for economic interaction in order to sustain societal acceptance, promote economic innovation, and limit indirect costs** of unregulated policies, allowing companies to abuse nature and people (for example societal damages such as harmful health impacts because of industrial production). It goes too far to fully unpack this argument proposed here.

However, in terms of evidence, the EU trade policy could serve as example. The EU has learned in the hard way with its trade policy that a neo-liberal paradigm is not sustainable. It has realised in the past decade that European citizens do not automatically accept 'free' trade policies with more deregulation for companies as being only beneficial for European societies. This rejection of the proposition of free trade as panacea for European societies has led to delay or breakdown of trade arrangements and negotiations. The World Trade Association is already becoming a



paralyzed institution, which powerful governments like the US setting their own rules. And the EU has learned that if it is too dependent on materials and technologies provided outside the EU, it is less able to protect its economy from shocks like COVID or digital flaws. EU's trade policy moved from a full embrace of the neo-liberal project to one in which strategic autonomy gained much more prominence, realizing that deregulation is not a guarantee to economic growth.

We want to stress that promoting gender equality and protecting women's rights is not something that is a distraction from EU's economic agenda; to the contrary, we believe that it fully supports this agenda.

We are proposing concrete strategic action around ten overall recommendations:

1. Keep previous agreed language on gender equality, LGBTQI rights and women's rights in place.
2. Introduce or strengthen institutional mechanism to monitor gender equality measures.
3. Ensure adequate and sustainable financing for feminist, in particular women-led civil society.
4. Promote the democratic participation of women from an intersectional approach.
5. Develop an intersectional approach and incorporate it into law.
6. Include measures to develop a gender equality approach in digital transformation.
7. Advance an inclusive and gender-just green transition.
8. Enable access for all women to health, including sexual and reproductive health and rights.
9. Reducing socio-economic inequality through an intersectional approach.
10. Promote peace processes, transnational solidarity, and prevention of violent conflict.



1. RECOMMENDATION: Keep previous agreed language on gender equality, LGBTQI rights and women's rights in place.

On 7th March 2025, the European Commission published the Roadmap for Women's Rights which seems to serve as a bridge between the Gender Equality Strategy 2020-2025 which is coming to the end of its mandate, and the new Strategy that is being prepared.

The Roadmap for Women's Rights, while maintaining a formal commitment to gender equality, marks a shift towards more cautious and conservative language compared to the Gender Equality Strategy 2020-2025. Security, protection, and safeguarding European values are recurrent themes, and the approach to gender-based violence is framed more in terms of law and order than structural social change. The document pays particular attention to the need to protect women and girls from "hybrid threats and security concerns," a formulation that, intentionally or not, echoes nationalist rhetoric gaining traction in several Member States.

Furthermore, it is relevant to note that the document adopts the term gender equality but overall with the connotation of women's rights and equality between women and men, thus avoiding any reference to LGBTQI(+) or anything beyond the binary category of men and women. We do not know if this omission is intentional or a lack of space to explain the interlinkages.

The Gender Equality Strategy 2020-2025 explains in section four that it is linked to the other strategies, including the LGBTQI strategy and in the introduction it explains briefly the scope of the strategy: "*This Gender Equality Strategy frames the European Commission's work on gender equality and sets out the policy objectives and key actions for the 2020-2025 period. It aims at achieving a gender equal Europe ... where women and men, girls and boys, in all their diversity [footnote 9], are equal*". Footnote 9 reads: "*The expression 'in all their diversity' is used in this strategy to express that, where women or men are mentioned, these are a heterogeneous categories including in relation to their sex, gender identity, gender expression or sex characteristics. It affirms the commitment to leave no one behind and achieve a gender equal Europe for everyone, regardless of their sex, racial or ethnic origin, religion or belief, disability, age, or sexual orientation*".

To enable the interlinkages with the other strategies and ongoing EU policies (for example the EU Erasmus+ programme counts the number of non-binary people reached), we would recommend to again include this definition in a new gender equality strategy.

The concept of gender equality has been instrumentalized in ideological attacks that have been prominent in different EU member states in the past decade framing it as being anti-nationalist in the sense that it undermines the traditional family values and norms. It has been politically objected to in institutional spaces of the EU as well. We believe it is not coincidental that the roadmap published this year focused mostly on women's rights. There is too much concrete work to be done in the current context to turn gender equality policy into a domain for political ideological contestation. In this context, it might be politically effective to refrain from focusing mainly on the concept on gender equality.



However, **the concept of gender equality and other concepts such as intersectionality are already established in EU policy and international conventions** for a reason. We want to point out that the current gender equality approach is broader than a policy on promoting women's rights and women's empowerment, and if the focus would be narrowed to women's issues, major gaps would remain. The EU has acknowledged that equality moves beyond focusing on one group -one example for this is mandatory paternity leave. **Framing the problem as one of equality allows men to become part of policies as a stakeholder that also has responsibility to contribute to the proposed change(s) and that can also be a beneficiary for policies.**

Often when we organise feminist meetings, which are events for any interested audience, a question is being asked about the role men play in feminism and their often minimal presence or complete absence in these meetings (men tend to shy away from joining a meeting when they see it is about women). Without taking away the need and importance of safe spaces for a particular group of women or other gender identities facing one or more forms of discrimination, we want to put forward that the concept of gender equality through an intersectional approach should be included in the upcoming strategy and the role of men and other gender identities besides women should not be forgotten.

1.1 Concrete Strategies

- The new strategy should include a reference to women and men, girls and boys, in all their diversity, in which the expression **'in all their diversity' is explained to express that, where women or men are mentioned, these are a heterogeneous categories including in relation to their sex, gender identity, gender expression or sex characteristics.** It affirms the commitment to leave no one behind and achieve a gender equal Europe for everyone, regardless of their sex, racial or ethnic origin, religion or belief, disability, age, or sexual orientation.
- **The concept of gender equality should be part of the strategic objectives, referencing the role of men and other gender identities in the implementation of the strategy.**
- **The EU must uphold and defend internationally agreed language on gender equality and human rights as enshrined in its own treaties, legislation, strategies, and action plans, as well as in internationally binding frameworks** such as the *Convention on the Elimination of All Forms of Discrimination against Women* (CEDAW).



2. RECOMMENDATION: Introduce or strengthen institutional mechanism to monitor gender equality measures.

The announcement for the new gender equality strategy suggests that one of the key objectives will be the continuation of the dual approach of gender mainstreaming and targeted actions. We welcome the efforts of the EU and member states to an ongoing dual approach combined with strengthening institutional mechanisms for (monitoring) implementation. Based on evidence from gender equality policies across regions and domains, we would like to propose some concrete strategies to consider for adopting into the new strategy.

Accumulated experience with gender mainstreaming or gender inclusion in policy objectives confirms that **the actual impact of policy intentions depends largely on whether in the actual implementation there are mechanisms that ensure follow up, including systemic monitoring and evaluation.** Women's rights civil society have played a key role to help monitor policies and their impact, for example through CEDAW shadow reports.

In the previous Gender Equality strategy 2020-2025 there was no specific percentage as quota of programmes having gender objectives as one or as main objective. However, the EU Gender Equality Action Plan III (GAP III) in external action -as with the previous GAPs- does include quantitative targets. The GAP III sets out that 85% of all new external actions will contribute to a gender equality objective (mainstreaming target).

Previous GAPs also included a target for gender targeted projects in line with the definition used by the OECD for its gender marker. The OECD DAC gender equality scoring system used three scoring (0, 1, 2) with gender as an objective (marked 1) that means that gender equality is a relevant objective, but not the principal reason for undertaking the action, while principal (marked 2) means that gender equality is the main objective. No score obviously means there is no gender consideration included. The OECD gender marker measures on percentage of budget and the EU on percentage of new programmes, which means both indicators do not measure the outcomes of the programmes and projects. For humanitarian aid, the Commission applies its own [humanitarian Gender-Age Marker](#).

A danger with quantitative scoring is that such scoring, as it is not measuring on impact and reduces the complexity to a number, remains 'a ticking of the box' exercise. Therefore, it needs to be combined with other forms of assessing the inclusion of gender equality objectives. The GAP III is again a good model as it combined quantitative monitoring with qualitative evaluations such as with the CLIPs (Country Level Implementation Plans). We also realize that it requires resources to set up and maintain a monitoring and evaluation system. However, we recommend the GAP III methodology with targets, regular monitoring, and qualitative evaluation to be adopted to more policy domains.

The EU Gender equality strategy for 2020 to 2025 also laid the foundation for introducing a gender budgeting tool in the EU's 2021-2027 multiannual financial framework (MFF). It was applied to all spending programmes in the annual budgets for 2023, 2024 and 2025. The [European Parliamentary briefing on gender-budgeting](#) gives a summary of what has been achieved and what are avenues forward. It concludes that in order: *"to make [gender budgeting] more operational and comprehensive*



the methodology needs to be developed and accompanied by other tools recommended by experts, for example ex ante and ex post gender impact assessments, gender audits, and the application of high quality indicators. In addition, introducing a target for spending on gender equality, as for climate mainstreaming, could be a turning point for embedding gender-responsive budgeting in EU expenditure. These are areas that the European Parliament could address during its 10th legislature". This resonates with the above suggestion we are making. It also underlines the importance of comprehensive evaluation.

A systemic gender analysis on impacts should be added to ongoing gender-budgeting exercises of the EU. EU's trade policy has built up experience with a systemic gender analysis in ex ante and ex post sustainable impact assessments, in particular the ones that are completed in and after 2022. The Sustainable Impact Assessments conducted in assignment of the European Commission cover a range of human rights, labour standards, economic and environmental impacts mostly in terms of expected impacts (ex-ante). It has incorporated in recent years a systemic analysis of the impact of women (after decades of including incidental impacts) through using the methodology outlined in the UNCTAD's Trade and Gender Toolbox published in 2017 with its CGE model. Analysis done with this system highlights also important gaps in data-collection, such as intersectional disaggregated data as well as extremely limited information about the informal sector in which women work, which is also a sector that is relevant for assessment in Europe.

There are several other developed tools and handbooks with indicators that can serve as inspiration:

- Canada facilitates **GBAplus assessments** (an analytical process used to assess how diverse groups of people from a gender perspective may experience the impacts of policies, programs, and initiatives differently).
- While the EU is analysing the impact of trade on women, it is mostly the impact of trade agreements on women in partner countries they are mapping. A positive example of mapping trade impacts on women inside Europe, has been the **Gender Export Gap Report, commissioned by the Scottish Government** and published in 2025 ([Gender Export Gap in Scotland](#)).
- Feminist Economists from different regions have been analysing trade agreement impacts on women for multiple decades, including furthering theoretical development. One example of theoretical development is the paper, "Gender Indicators for monitoring Trade Agreements", prepared by professor Irene van Staveren in 2007 for WIDE ([Staveren gender indicators](#)).

What is important in terms of gender-budgeting is to ensure that the EU budgeting tool for tracking the whole EU budget does not only monitor Gender Equality responsiveness, but also intersections with different groups of women, including migration status, age, disability, LGBTQI-identity, etc.

Our final suggestion is to improve the collection and analysis of gender-disaggregated data. There are still important gaps in the collection of data to see the impact of distinct categories of women intersected with other characteristics, for example migration or ethnicity. And the availability of data on other genders than men and women is further lagging. A related problem is the harmonization of categories of data to allow for comparison over time and across countries.



2.2 Concrete Strategies

The EU should in the new strategy:

- **Include targets for gender mainstreaming and ideally targeted actions as part of the total budget or programme for which the GAP III can serve as a model.**
- **Continue with gender-budgeting within the MFF cycle and programmes and include systemic gender impact analysis and an intersectional approach.**
- **Improve the collection and analysis of gender-disaggregated data, addressing gaps in data, improving the intersectional approach and gaps in cross-national harmonization.**



3. RECOMMENDATION: Ensure adequate and sustainable financing for feminist, in particular women-led civil society.

The EU must significantly increase funding for feminist organisations, particularly groups, associations and networks that include working on multiple intersections, both in Europe and externally, and who are critical actors in upholding human rights, advancing democracy, and reaching marginalised communities. And secondly, funding needs to be flexible, long-term, accessible, and allocated through transparent and participatory mechanisms that allow women rights and feminist organisations to set their own priorities. Finally, we want to appeal for increased support to participate in formal advisory spaces within the EU institutions. We explain our three recommendations with experiences from our collective work.

‘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 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.

Feminists have for a long time promoted the inclusion in policy making of those people that are directly affected by the policies as they know the context, needs, challenges, etc., at first hand. Besides knowledge, **they often also have relevant networks that can support the implementation of a policy, bridging lack of knowledge or distrust between potential beneficiaries or target groups and professionals** implementing the policy.

And thirdly, **the inclusion of civil society in a transparent manner can increase the acceptance towards policies, or at least towards the policy makers in creating an acknowledgement that a policy was developed in a ‘fair’ democratic process,** in which the final majority view has been adopted. The EU has developed different forms for civil society participation, of which this online consultation is one example. These mechanisms are important and should be further strengthened.

While the EU has developed formal spaces and mechanisms for civil society to share their knowledge with others and to provide advice, contribute to policy development or help monitor policy implementation, our network experiences increased barriers to participate in formal spaces as well as encouraging other feminist and women’s rights associations to participate. WIDE+ is currently the only feminist/women’s rights association that is taking part on behalf of the EU in Domestic Advisory Groups (DAGs) around different trade agreements. We are currently actively participating in three DAGs: the one between the EU and Canada, the one between the EU and Central American countries and the agreement between EU and Colombia, Peru, and Ecuador. While there is some travel support available from the DAG secretariat, we would really like to involve other civil society associations and groups into the monitoring, to improve the feedback we can collect and increase awareness on the trade agreements. Funding to reach out to other civil society is lacking.

Also in our work around the implementation of the Artificial Intelligence (AI) Act, we experience and see



how difficult it is for civil society associations to take part in processes to help implement the Act according to its principles for upholding fundamental rights in high-risk AI tools to enter the European market when the AI act is enforced. **Standardisation bodies can include the participation of civil society. However, associations need to pay for their participation in terms of reimbursing time invested by a dedicated representative, as a well-prepared participation requires a lot of time.** And it also requires a level of specialisation into the topics, which requires again time investments. This is a barrier for many associations tied to project funding and facing scarcity of financial support compared to representation of businesses into these standard-setting processes that can more easily allocate financial resources for this participation.

It would be especially important to have more civil society representatives taking part in the different committees around setting standards around the AI act and any further development of AI standards, as their expertise, and more general perspectives about societal impacts, is currently underrepresented. We would want to ask for additional support to participate in the CEN and CENELEC Joint Technical Committee 21 (JTC 21) group(s).

In addition to support for participation, we want to underline the importance of funding feminist associations that represent constituencies. To make our evidence-based argument, we want to share insights from our gender and migration working group. The WIDE+ network keeps the concept ‘Nothing about us, without us’ dear to its governance approach for promoting societal change. One of our four thematic European working groups is the WIDE+ gender and migration working group. This working group brings together networks, groups and associations that are all women-led either by migrant women, or a mix of migrant women activists, groups and other women’s groups and leaders. WIDE+ adopts an inclusive definition of “migrant” women.

For our purposes, migrant women refer to all women, who have been displaced between countries, trafficked, moved from a third or European country to a destination in Europe, or are second-generation migrants. This definition includes third-country nationals, asylum seekers, refugees, undocumented migrant women, women with migrant parents, and mobile EU citizens. While our approach to defining migrants is broad, we acknowledge that migrant women experience varying degrees of resources and vulnerabilities. In some projects or contexts, it will be very relevant to focus on a specific group of migrant women, like trafficked women or refugee women. We oppose political concepts in which diverse groups of migrants are pitted against each other or used for other kinds of xenophobic narratives towards migrants.

Since the inception of the working group in 2016, organisations, groups and networks have come together regularly to exchange their expertise and experiences. The reports on our website are a testimony of this collective analysis. The marginalization of migrant women groups and associations has been a recurrent concern in our working group. **Often groups are also faced with extremely limited access to financial support, which mirrors the lack of attention to the context faced by migrant women and girls in programmes of the EU and of EU member states at national, regional, and local level.**

In 2022 WIDE+ published its review of EU funds towards migration women and migrant women’s associations (<https://wideplus.org/wp-content/uploads/2022/05/Marginalizing-Migrant-Womens->



[Associations-in-EU-Policies-Tracking-EU-Funds.pdf](#)). The report confirmed the huge contribution of migrant women to European societies. At that moment Europe was grappling with the aftermath of the COVID-19 response, in which women, especially migrant women, had been at the frontlines as they conduct a disproportionate part of caring roles (time spend on unpaid and paid care). Similarly, the precarity faced by migrant women increased, but our member organisations reported that their governments often overlooked this precarity.

Our review from 2022, which synthesises findings from various sources that have evaluated the EU budget and funding lines, found that migrant women are simply not prioritised. In policy areas where migrant women are considered, the approach is often economic-oriented and fails to address the multiple intersecting issues they grapple with, including racism, xenophobia, and sexism. This led to an increased demand on migrant women groups and associations, which offer informal community support, help with guiding migrant women to services (offering peer support and language support for example), provide targeted integration projects, and other types of support and solidarity. They can be a bridge and safety net where formal provision fails to connect or is not available.

Our review concluded that migrant women associations and feminist associations with migrant women and others are conducting an immense work, despite operating on thin resources. And the review of EU's budget allocation in the past years, led to our conclusion that the EU had allocated some funding to migrant women's associations in Europe (EU and neighbouring states), but that the amounts were nothing compared to EU's overall budget.

We estimated that for the previous seven-year budget of the EU, 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 Daphne programme 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 from a limited amount of research that a very low percentage of the budget is implemented by women's right associations thus we expected implementation by women's migrant associations to be even lower.

As many migrant women associations and groups have problems accessing financial support, a majority of them tend to remain small in terms of their financial capacity, which keeps a circle in place that again makes it difficult to compete with large NGOs and institutions that can arrange for the needed financial capacity to manage large grants as well as ensure support and expertise for writing project proposals. **The EU has taken steps in the previous years to make it easier for grassroots associations to be supported by EU grants**, for example through enabling regrants, reducing the percentage of needed additional financing for grants, and through standardisation of its application process as well as reducing financial administration in different calls. We welcome these developments and would like to encourage the EU to continue on this path. What is also extremely helpful is flexibility in support, for example with the recent Erasmus+ programming in which the current grant cycle of the EACEA allows for more flexibility in designing a coherent project of collaboration.



3.1 Concrete Strategies

- **The EU must significantly increase funding for feminist organisations, particularly groups, associations and networks that including working on multiple intersections, both in Europe and externally, and who are critical actors in upholding human rights, advancing democracy, and reaching marginalised communities.**
- **Feminist civil society continue to make a strong appeal for funding that is flexible, long-term, accessible and allocated through transparent and participatory mechanisms** that allow women rights and feminist organisations to set their own priorities as well as processes that are not too complex administratively to apply for and manage.
- **We call for increased (financial) support to participate in formal advisory or standard setting spaces within the EU institutions, in particular the Domestic Advisory Groups around trade agreements, and the CEN and CENELEC Joint Technical Committee 21 (JTC 21) around the AI Act.**



4. RECOMMENDATION: Promote the democratic participation of women from an intersectional approach.

It is a human right to be able to politically participate in the place a person lives. However, the reality is often that women, young people, migrants, and minorities are not or unrepresented in political spaces and in policy consultations of the EU and EU member states. There have been many efforts taken to track and encourage the participation of women in political bodies. Some EU member states work with quota for example to ensure or encourage a reasonable percentage of women into parliaments and other elected bodies.

Often forgotten in elections and data for tracking women's participation into politics, are migrant women. Many countries do not provide electoral rights if the migrants do not have an EU passport. Migrant women who are mobile EU citizens can vote either in their home country or in their host country. They are also eligible to vote in municipal elections, and in different Member States, they can stand as candidates in the host country. In contrast, migrant women from non-EU countries are generally excluded from voting in municipal, national, or European elections, with exceptions. For example, in Denmark, Sweden, and Finland, they can vote in municipal and regional elections after a certain number of years of residency. Spain has bilateral agreements with specific countries that grant access to the residents from these countries voting rights under certain conditions. And this landscape is not fixed, as political debates regarding constitutional changes to extend voting rights have taken place in France, Austria, Germany, and Italy ([ECIT Foundation](#)).

Migrants represent a considerable proportion of the European population and women are more or less equally represented in this population. According to Eurostat data from 2021, there are 447.2 million people living in the EU. Of these, third-country nationals, or non-EU citizens, make up approximately 5% of the population, or 23.7 million people. If we add on mobile EU citizens, this figure increases to nearly 10%.

We know that women are as a group underrepresented in political processes, but there is hardly adequate quantitative data for migrant women. This is the main outcome of the studies WIDE+ and partners conducted as part of the project: "Expanding tools in Addressing Barriers for Migrant Women to Participate in Democratic Life", in short, WE-EMPOWER. It united seven organisations and networks and associate partners, all committed to safeguarding and advancing the rights of migrant women in Europe and is financed by the EU Erasmus+ programme. The project has been wrapped up by the end of 2024.

This is what our studies found:

- There is a lack of research and data around the political participation of migrant women in the EU and across European states.
- The limited information available, confirmed by each study, points to migrant women being marginalised in political processes.
- Migrant women are not the only one 'missing': there is a severe lack of participation of women in political and public decision-making from under-represented and discriminated groups that



include migrant women, Roma women, LGBTQI women, and women of colour ([Council of Europe in 2020](#)).

A key barrier that can only be changed by law, is granting active and/or passive election rights to migrants that do not have an EU passport. If one takes the concept of political participation in its broadest implication, it is about democratic participation. Democratic life also involves being actively engaged in community and social life, expressing active citizenship, such as participating in non-governmental associations and organisations that are concerned with the public and political life of the country. A healthy democratic life, a term we discovered through the EU Erasmus+ programme, starts with enabling active citizenship in its broadest sense.

The key barriers that consistently came forward in our studies for democratic participation is firstly the language barrier, which often isolates people from political institutions and wider public life. Many studies also find that marginalisation in democratic life is compounded by multiple sources of discrimination with a considerable number of migrant women encountering sexism, racism, and xenophobia. For example, in Denmark, migrant women are stigmatised by political rhetoric, while many lack full electoral rights, as only Danish citizens can vote in Parliamentary elections, and the citizenship process is notoriously difficult.

And finally, economic vulnerability also plays a critical role, as migrant women tend to be more often either unemployed or confined to low-wage jobs, making them vulnerable to exploitation and poor working conditions. Italy's restrictive immigration laws and unequal labour market opportunities prevent many migrant women from securing residence permits or voting rights, while the media often portrays them through a cultural lens as 'the Other,' further alienating them from political processes.

In our project we concluded that political or broader democratic processes should be redesigned as inclusive, giving migrant women access to decision-making positions and voting at both local, regional and national levels. We believe this a concept of inclusivity can be applied to all different categories of women and marginalised genders intersected with one or more categories for potential discrimination such as disability.

When it comes to migrant women, a key entry point, also for improving access to other rights, is simplifying the process for acquiring citizenship and reducing other bureaucratic challenges. It can be extremely tedious to register as a formal association, for example, if migrant women want to further organise themselves. Public institutions can and should also improve their participatory mechanisms; migrant-led advisory councils are recommended, which can be implemented at each level of governance from the local to the transnational.

And concrete strategies are to ensure easy access to language programmes and translation services, but also education about the political system, migrant women's rights, and opportunities for engagement. Economic empowerment initiatives are needed, and this is also about recognising education completed outside a country on equal footing for education completed in the country of residence.

Mentorship from (migrant) women leaders and other peer support from civil society organisations as well as training are also effective. This means that financial and political support is necessary for migrant women's organisations to thrive and enable them to influence decision-making and share their



expertise, and self-organisation should be encouraged. Affirmative action, including quotas for board and committee memberships, can help create role models and ensure more diverse representation.

Enabling democratic engagement and expression by migrant women leaders, other feminist activists and associations, and civil society as a whole, requires and is based on the assumption that civil society can safely participate in public spaces and express their views, online, on the streets, in media and in consultations. This has come under pressure through backlashes on feminist associations and activists initiated by anti-gender / ultra-conservatist movements that has gained influence over the past decade, and that is connected to attacks on democratic values, climate action, LGBTQI-rights and those of minorities in general.

4.1 Concrete Strategies

The new strategy should:

- **Enable research and data collection around the political participation of women intersected with belonging to under-represented and discriminated categories that include migrant women, Roma women, LGBTQI women, and women of colour.**
- **Support and encourage the democratic participation of women intersected with belonging to under-represented and discriminated groups that include migrant women, Roma women, LGBTQI women, and women of colour.** Advisory councils with an adequate representation of these groups are recommended, which can be implemented at each level of governance from the local to the transnational.
- **Keep promoting safe spaces for democratic participation of women's rights and feminist organisations, especially those led by migrant women or other minorities and acknowledge and encourage them to thrive.**



5. RECOMMENDATION: Develop an intersectional approach and incorporate it into law.

It has been an important milestone that the previous Gender Equality Strategy as well as many of the other strategies of the EU, like the anti-racism and LGBTQ strategy, include an intersectional approach with a definition from EIGE, the European Gender Equality Institute.

Women, girls and marginalised gender identities in all their diversity must have equal decision-making power at all levels. Structural barriers continue to hinder women's and gender-diverse people's full participation in economic, political, and public life. We call on the EU to acknowledge the specific needs and contexts of underrepresented groups.

Tackling structural gender inequalities requires a transformative and intersectional approach that addresses root causes and overlapping systems of oppression, based on gender, race, class, disability, migration status, sexual orientation, and more. It means that the voice and leadership of underrepresented groups is acknowledge and included, such as of women with disabilities, migrant and refugee women, women of colour, LGBTQIA+ persons and sex workers. And the engagement men and boys among other gender identities, is necessary, for example to challenge harmful gender norms and stereotypes and encourage shared caregiving responsibilities.

We want to promote an intersectional approach into the implementation of adopted conventions and directives on online and offline gender-based violence. Obviously addressing Gender Based Violence with an ambitious agenda should be part of the new Gender Equality Strategy. The EU must take stronger action to prevent and respond to online and offline gendered violence targeting women in all their diversity. This includes implementing the EU Directive on violence against women, in alignment with the Istanbul Convention, now ratified by the EU.

Our members repeatedly call for an intersectional approach in the implementation of regulation to combat Gender Based Violence. Our network members and partners in the WIDE+ European Gender and Migration working group have shared much evidence on how migrant women face a higher risk to gender-based violence and domestic violence. This is not a cultural issue, but more a result of structural factors, for example, mostly migrant women perform precarious domestic work, they are victims of trafficking, or family reunification laws might encourage migrant women to stay in abusive relationships. Our members have also shared much evidence that document that migrant women face additional discrimination when trying to access services to protect them from violence, thus leading to decreased use of such services. We recommend studies into these processes by the Red de Mujeres Rurales de América Latina y El Caribe (network of Latin American and Caribbean migrant associations in Spain): <https://tirardelhilo.info/>.

When it comes to the concept and approach of an intersectional perspective, **we recommend to again include the EIGE definition for intersectionality as it is included in the current strategy.** We suggest adding further explanation of how an intersectional approach is operationalized in the different policy domains. For example, there could be a brief explanation for each thematic topic how it is approached from an intersectional perspective.



There are two major gaps when it comes to the implementation of an intersectional approach in policy and law. Firstly, the EU directives around protecting people from discrimination focus on discrimination occurring on only one ground of the six grounds, also called protected characteristics: gender, age, racial or ethnic origin, religion or belief, disability, sexual orientation. While implementing the anti-discrimination directives, some member states include additional grounds of protection. There is no explicit definition in the current regulatory framework that protects people from intersectional discrimination. And courts are hesitant to recognise such type of discrimination. **The lack of harmonization between the different directives and the lack of incorporation of intersected forms of discrimination means that the directives fail to capture all forms of discrimination.** In this context, it is of high importance that the European Commission has revived its equal treatment directive after initially removing it from its 2025 plans. We hope the Council will approve the initiative.

When developing and using Artificial Intelligence tools in the market (post-deployment), the concept of intersectional discrimination is appropriate; it could work better than a framework of assessing discrimination on single protected grounds only. Algorithms operate based on many possible biases that can occur. Roughly there are three types. Algorithms read data through societal biases that are included in the data they are interacting with for their task; there is bias in the design of the tool. And there are emergent biases from the interaction between the AI tool with its context. The unexpected combination of data, design and interaction can lead to biases that at first glance seem illogical and are most likely completely unintended. Algorithms can interpret data in completely unexpected ways, especially through proxy information. For example, one research found that in job applications hobbies such as walking in Sweden correlated positively with a higher ranking in suitability of CVs (see for more: <https://www.biasproject.eu/>). A more common 'proxy' is the inclusion of a name in data that an algorithm scan for the task it designed to do. Another example of research of AI in hiring processes: it has been proven multiple times that having a name that expresses a minority identity can lower the scores for suitability to a job.

Proxy variables are substitutes that often occur in software applications. Even if certain characteristics, such as the origin of applicants, should be ignored by a specific system, the algorithm can still be influenced by them by proxy information. For example: a recruiting software is supposed to automatically identify qualified candidates for an open position. Technically it is supposed to ignore the age, origin, and gender of the applicant. However, it rates their work experience. Based on that information, the system can draw conclusions about, for example, the age of the applicant as part of its recommendations (rating age in a certain way). An applicant with 20 years of work experience cannot be 25 years old. Or, if someone went to a girl's school, this indicates the gender of the candidate, while zip codes can serve as proxy for assumptions about the socioeconomic background of candidates.

Data is full of proxies, meaning that the use of algorithms for tasks that impact people, such a providing ranking or pre-selection of candidates for jobs and allocation of services or selection for control, can lead to all kinds of unintended combinations of biases leading to discriminatory impacts. Thus, the development of an intersectional definition of discrimination is even more relevant in the digital domain. And with the enforcement of the AI Act, the standards for high-risk AI tools will be set.

The AI Act puts obligations on providers of such high-risk AI systems to take appropriate measures to detect, prevent and mitigate possible biases that are likely to affect the health and safety of persons,



have a negative impact on fundamental rights or lead to discrimination prohibited under EU law. These obligations apply primarily to the development stage before the system is operating in the real world or market. However, certain obligations apply specifically after the AI system has been deployed (post-deployment monitoring and external governance).

Connected to the need for a clear definition of intersectional discrimination in policy, is the inclusion of such explicit definition in the law. Courts in the EU generally do not consider intersectionality. While scholars argue that the courts could protect victims of intersectional discrimination, even under current EU non-discrimination law, courts seem to shy away from this option due to a lack of a clear and explicit definition (see: Fredman, S. (2016). [Intersectional discrimination in EU gender equality and non-discrimination law](#). Publications Office of the European Union, and Howard, E. (2024). [‘Intersectional discrimination and EU law: Time to revisit Parris’](#). International Journal of Discrimination and the Law, on page 15). So far, the European Parliament has adopted a resolution acknowledging intersection discrimination, but this resolution is not legally binding, as it is neither a directive nor a regulation.

5.1 Concrete Strategies

- Obviously addressing Gender Based Violence with an ambitious agenda should be part of the new Gender Equality Strategy. **And we advocate for an intersectional approach in implementation of the GBV directive and Istanbul Convention.**
- **There is a need of harmonization between the different anti-discrimination directives and the incorporation of intersected forms of discrimination, especially the further use and development of algorithmic tools** (given the enforcement of the AI Act in 2026).
- **A definition of intersectional discrimination should be developed and included in binding policy, regulation, or law.** Among others this can help people to bring forward claims of intersectional discrimination to courts.



6. RECOMMENDATION: Include measures to develop a gender equality approach in digital transformation.

We would welcome in the new EU Gender Equality strategy a section on Artificial Intelligence and the digital transformation. If we want to ensure EU's competitiveness, we need the development of a European digital industry including AI development, according to European standards that include proper gender equality and anti-discrimination standards. We believe it is a false narrative that we can fully control how AI makes decisions. Thus, as European nations together **we shouldn't rely too much on the current big tech companies mostly located outside Europe as there is even less control over their operations. Currently the EU runs the risk of becoming a digital colony.**

For WIDE+ a gender equality approach in the digital arena moves far beyond the inclusion of more women in STEM positions (science, technology, engineering, and mathematics). We base our views and analysis on our participation in the EU funded Horizon Project "FINDHR" to prevent, detect, and mitigate intersectional gendered discrimination in Algorithmic hiring. WIDE+ is part of a consortium to implement a 3-year research and innovation project. The project will end by early 2026. The collaboration has led to guidelines, methods, algorithms, and training for an intersectional anti-discrimination approach that are contextualized within the technical, legal, sociological and ethical problems of algorithmic hiring. Its findings could be applicable -with further development- to a broad class of applications involving human recommendation. The final conclusions will be published in the fall of 2025. We will share a few highlights here.



Toolkits for Policymakers, Software Developers and HR Professionals, available online and as PDF:
www.findhr.eu/toolkits.

Other FINDHR materials:

- Training Course Materials
- Equality Monitoring Protocol, combining technical and legal options to monitor discrimination
- Impact Assessment and Auditing Framework
- For Job Seekers: Fine-Tuning your CV
- Recruitment Software Development Guide
- Scientific publications & External Expert Reports
- Datasets and Software Development: Synthetic CVs, Synthetic Interactions, Fairness API

FINDHR is a project funded by the EU framework programme Horizon Europe (under the call: HORIZON-CL4-2021-HUMAN-01-24) and unites 11 partner organisations in developing anti-discrimination methods, algorithms, and training for algorithmic hiring. The consortium includes leaders in algorithmic fairness and explainability research (Universitat Pompeu Fabra, Universiteit van Amsterdam, Università di Pisa and the Max-Planck-Institut für Sicherheit und Privatsphäre), pioneers in



the auditing of digital services (Eticas Research and Consulting), and a leading industry partner (Adevinta). It is complemented by experts in technology regulation (Radboud Universiteit) and cross-cultural digital ethics (Universiteit Utrecht), and three NGOs dedicated to fighting discrimination (AlgorithmWatch CH, Praksis Association and WIDE+).

FINDHR is based on the premise that discrimination occurring through algorithmic recommendation processes is a lose-lose scenario focusing on the recruitment process. On the one hand, the individual or groups affected have one of their most fundamental rights violated and are less favourably treated based on characteristics protected against discrimination. On the other hand, it leads to higher cost for companies in the long run: recruiters risk not only a bad reputation but also to miss the most suitable candidate if they filter applicants based on characteristics that are not related to qualifications. Reducing algorithmic discrimination in recruitment is therefore crucial on ethical, societal, and economic levels.

WIDE+ was responsible for the Participatory Action Research Sessions (in total around 25) that reached to close to 170 people of underrepresented groups in 7 different countries. It provides insight into the intricate dynamics of discrimination in the online hiring process, making visible the views and experiences of people facing higher incidence to discrimination from an intersectional perspective as well as empowering them to counter to some extent this possible discrimination. In the end the jobseeker have the least control and say over a hiring process; their strategies are limited to trying to shape their CV and application in a way that it is better read and ranked by an Algorithm, asking for information (about the AI assisted selection), providing feedback and asking for redress in cases where discrimination is suspected.

Our research found a lot of self-reported cases of discrimination, though the most visible discrimination is the one that happens through the communication with recruiters. Often the AI-related discrimination is hard to detect due to very limited information being shared about the process to applicants. Even though algorithmic discrimination can concern anyone, **our research confirmed that inequitable treatment based on characteristics that are protected under European anti-discrimination law, including of women, migrants, or people with disabilities, is particularly frequent.** Participants shared experiences of both human and algorithmic discrimination, often based on gender, ethnicity, and age, which are also personal characteristics that are difficult to hide. Discrimination was experienced throughout the hiring pipeline, up to being hired and quickly fired or offered a demoted position. Also, many highly qualified individuals shared stories of being told by human recruiters that they were either overqualified, did not fit the team, or, in the case of AI-based hiring processes, received no response at all despite meeting the criteria. **A common recurring frustration was the lack of adequate explanation and feedback when applying through an AI tool. Many participants reported not even receiving replies to applications.**

*“I sent out 100 resumes in 1 month but did not get any interview call-back. The only few interviews I managed to get were through referrals.” – Ju
(Plackis-Cheng, P. et al. (2023) p. 25)*

Algorithmic systems are often deployed in secrecy, without informing people that an automated tool made or contributed to a decision affecting their lives, let alone informing them about

important parameters, how the system works and reached its decision. This makes algorithmic discrimination really hard to detect for people who have been subject to it, noting that people with multiple intersections of increased risk to discrimination will be more likely negatively affected by the tool.

Our research also confirmed that those that are most marginalised, like homeless people or illiterate people, do not even access the digital domain for jobseeking. We conclude that a relevant minority in European societies are cut off from digital processes, which can in turn lead to different forms of exclusions. A related aspect is **that women, girls, and those with a marginalized gender identity, especially when they are also migrant, disabled, etc. receive more online hate and violence. This can in turn decrease their presence in the digital domain by women, thus reducing using online tools.** This was what one of the experts reports of FINDHR found, migrant women made less use of online jobseeking tools and platforms due to previous negative experiences and fear for abuse and online violence (see: C. Rosales, N. Buslón, F. Curi and R. Jorge (2023), 'Beyond the Algorithm: Expanding the understanding of fairness and non-discrimination in algorithmic hiring – [The case for Latin American migrants seeking for employment opportunities in Spain](#)', FINDHR Expert Reports).

When we contextualise the findings from our participation in the FINDHR project, we conclude that the development of algorithmic systems increasingly relies on large-scale data, often from the US. These systems are vulnerable to creating structural inequalities embedded in the data, especially along gender, race, age, disability, migration status, and sexual orientation lines. **FINDHR research confirms that discriminatory outcomes in algorithmic hiring are not only a matter of design and testing but requires a careful reflection on how diverse, correct and representative the data is.**

Data that is sensitive is essential to detect discrimination, yet its use is severely limited by the GDPR (General Data Protection Regulation). Sensitive data has a specific description in the GDPR, which excludes gender and age, but includes for example ethnicity. The regulatory framework imposed by the GDPR is essential to safeguard those with the least amount of power from data-extractivism, although it creates additional challenges for enabling a good grasp of how an algorithm interacts with data of people. **Despite these challenges, the increased transparency around the operation of algorithms in the market should be promoted.**

Algorithmic processes should not remain a black box to those who use it and to those that are impacted by it, especially if there are serious negative impacts, such as fines, on not being pre-selected for a job interview. This means that algorithms should come with a system card (a full explanation of its architecture and its components) and it should also be explained to the end-users. The term 'end-users' points to those people for which the tool is intended: clients, beneficiaries, subjects, etc. Applying this to a hiring pipeline, the jobseekers are the end-users and recruiters will be other users of the AI system. When a jobseeker is applying, this person should be informed that their data is being processed by an algorithm as well how this is monitored and how their data is reviewed (like rejection of application because of low score on criteria x or because the algorithm couldn't read the file). The right to be informed is most beneficial to those that have the highest risk of being discriminated against, such as women intersected with other identity markers.

Finally, we want to make a case for supporting civil society in the further implementation of the AI Act. This support should continue for a while, as it is a large piece of legislation that is being introduced and there is a lot unknown about algorithms. Many people need a better understanding to be able to deal effectively with AI. **The articles around AI literacy in the AI Act could prompt the EU and member states to allocate specific tasks with financial support or grants in promoting AI literacy among those most at risk of being harmed or discriminated by AI tools.**

6.1 Concrete Strategies

- **The EU and member states should support civil society to participate in the implementation of the AI act, especially to help them develop and provide AI literacy.**
- **The EU should take more measures in policies, regulation, and oversight to enable more transparency in the implementation of the AI Act. End-users, including beneficiaries, should be able to exercise their right to be informed when an algorithm is used. This means receiving an explanation when a person is interacting with an algorithm and how it is processing their data.**
- **It is important to stimulate targeted programmes and projects to protect and encourage women, girls, and those with a marginalized gender identity, to use online tools and spaces, given the higher amount of online hate and violence.**



7. RECOMMENDATION: Advance an inclusive and gender-just green transition.

To protect its global competitiveness and economic security the EU must guarantee that its transition to a green and digital economy is inclusive and gender-just. Europe can simply not afford to leave half of its population behind in its further development of the economy.

Feminists from the Global South and the Global North, including WIDE+, stress that the climate crisis is a social crisis. The environmental challenges posed by climate change are universal, affecting every nation and community. However, **it are the most wealthy on this planet that are contributing the most to climate change**, be it in the shape of large transnational companies, the most wealthiest persons or the high-income countries (see for an analysis about the latter the presentation by Anke Schaffartzik in our first [COPGendered report](#)). **At the same time, the climate crisis exacerbates inequality, intensifies poverty, and plunges the world's most marginalised populations into heightened insecurity.**

The brief analysis that we share here is based on a multi-year collaboration entitled: "Gender and Climate Justice: Knowledge for Empowerment", in brief COPGendered. This project builds up tools, knowledge and methodologies for learners to upskill themselves (in groups, individually or with a teacher) in the relationships between gender inequality and the climate crisis. This includes providing tools for adult education providers. The project lasts for three years and ends in November 2025. WIDE+ is coordinating the project with 6 other associations; it has published briefing papers and an e-learning platform: <https://comm.gendercc.net/>.

Vulnerable groups, encompassing women, children, LGBTIQ individuals, people with disabilities, minorities and indigenous peoples, bear the brunt of the impact of climate change. The escalating threats, ranging from rising sea levels to more frequent extreme weather events, disproportionately affect these groups. The prevailing discrimination and exclusion faced by these social groups render them exceptionally susceptible to the adverse impacts of climate change.

In addition, we see that powerful groups within our current political and economic governance have a significant influence on the proposed climate policies, such as by huge transnational companies that are responsible for most of the CO2 emissions. These policies and solutions are mostly or completely blind to the impact they have on these marginalized social groups. Older white males tend to be overrepresented in European climate change policy-making groups. **Mary Robinson, former U.N. climate envoy, once stated: "Climate change is a man-made problem and must have a feminist solution". Gender considerations must not be an adjunct but rather a fundamental element in shaping ideas for a just transition through a feminist lens.** Consequently, such concepts should be informed by feminist principles, alongside decolonial and anti-racist methodologies.

Particularly within ecofeminist discourse, notably prevalent in Latin America, emphasis is placed on the nexus between violence against nature, territories, and human bodies. **Feminist critique has consistently pointed out that the commodification of productivity, efficiency, and competition tends to sideline the imperative of nurturing both human and environmental well-being.** Western political-economic governance is geared to enhance a relentless pursuit of productivity, measured by



GDP growth, which results in an enduring crisis of social reproduction. **Notably, prevailing green economic discourses often prioritise technological solutions, thereby obfuscating the underlying economic and ecological structures.** This perspective narrowly focuses on technological advancements' capacity to remediate, enhance, or streamline processes while at the same time failing to address the root causes of contemporary challenges. In other words, just changing the technology will not bring us climate justice. We need to reconsider not only socio-political power imbalances, but also our economic model that is driving forward our economic growth.

Feminist advocates have consistently opposed the practice of patenting living organisms and the commodification of women's bodies, prioritising scrutiny of the social ramifications and associated costs. **Their emphasis lies in reclaiming communal resources and fostering collective ownership.** Central to ecofeminist thinking is the recognition of climate change, gender disparity, and societal inequity as interrelated challenges, all stemming from the prevailing dominance of patriarchal structures within society. Part of this critique is the development of (eco-) feminist alternatives that aim to put reproduction or care at the centre of the economy, based on **a socio-economic model that is not aiming for as much economic growth as possible but balanced sustainable growth in which people live within planetary means.** An example of such alternative models and practices is the development of the Buen Vivir concept, stemming from indigenous communities in Latin and Central America. Another is the role of local/regional cooperatives that focus on basic needs.

Elements of a well-being economy, such as more sustainable production chains and balancing private life, reproduction and care with productive work, can be promoted in the upcoming Gender Equality Strategy through incorporating gender mainstreaming or less ambitious gender targeted projects into the European Green Deal, which sets out to reduce net greenhouse gas emissions by at least 55% by 2030. **The "Smart and Sustainable Mobility Strategy" (SSMS) is a key component of the European Green Deal. While the strategy acknowledges gendered employment gaps, it lacks proposals for mainstreaming gender equality in mobility and transport policies** and fails to address safety concerns for vulnerable individuals using public transport or working in the industry. Moreover, we believe the policy overly prioritises individual mobility by promoting electric cars over public transportation. This approach exacerbates environmental damage due to increased demand for raw materials like minerals and rare earth for electronic devices and batteries. The strategy's emphasis on male and middle-class mobility patterns and neocolonial extractivism further perpetuates inequalities and environmental degradation.

Incorporating an intersectional gender lens into SSMS policy area can increase gender equality and lead to a more efficient strategy to achieve the policy goal greenhouse gas emissions. Globally, women shoulder three-quarters of unpaid care work, leading to more complex travel patterns for women compared to men. Women often undertake shorter trips but with multiple tasks, such as taking children to school while running errands or assisting family members with mobility limitations. However, existing transport networks primarily cater to commuting needs, neglecting women's requirements for multiple off-peak trips. Furthermore, personal safety concerns significantly influence women's mobility choices. Fear of sexual harassment and assault leads women to prioritise safer transport options, even if they are more time-consuming. This exacerbates time constraints and "time poverty" for women with unpaid caring responsibilities. Gender differences in the use of bicycles and new shared mobility



options in Europe are notable. Research indicates that men cycle significantly more than women, with women's lower bicycle usage largely attributed to concerns about traffic safety.

The sector of transportation and connected to it the mobility infrastructure is one example of how redesigning it from a gender equality lens can bring multiple benefits for equality, efficiency and greenhouse gas reductions.

Our position is that European countries and the EU should take responsibility for current macroeconomic policies that contribute hugely to pollution such as CO2 emissions, and they should transform these policies through an intersectional gendered approach. **This entails supporting macroeconomic strategies aimed at transitioning towards a “well-being” or “caring economy.”** Such an economy would also necessitate holding companies accountable for upholding human rights and environmental protection standards, while also ensuring that extractive industries are held liable for any adverse impacts they may cause.

7.1 Concrete Strategies

- **The Gender Equality Strategy should promote the integration of intersectional gender and LGBTIQ perspectives throughout the entire spectrum of data collection, analysis, and policy making in policies supporting the Green Deal.** In this way it should foster a more nuanced understanding of the challenges faced by diverse communities. Part of this process is to **recognise and amplify the vital role of civil society in driving climate justice awareness and holding polluting entities accountable.**
- **The EU and Member States should prioritise sustainable and equitable public transport options,** catering to the diverse needs of women and other underserved groups of people. **Overall, it should promote the integration of a gender-responsive approach in policy development.**
- **Governments should promote sustainable consumption, based on macro-economic policies that promote reusing materials and decrease the excessive global shipping of goods and oil.** Part of these policies are trade policies based on human rights, environmental standards and feminist social justice. The EU and Member States should ensure fair pay and labour conditions, along with stringent environmental standards, to foster more sustainable production, transport, and consumption cycles. This includes a full commitment and implementation of the Due Diligence regulation



8. RECOMMENDATION: Enable access for all women to health, including sexual and reproductive health and rights.

WIDE+ welcomes the inclusion of health to the upcoming Gender Equality Strategy. In several EU member states access to health, especially sexual and reproductive health, is decreasing. And despite the huge scientific progress, there are still important research gaps around health problems that are connected to women's bodies, intersected with other kinds of differences.

Our mission statement reads that we: “strive for rights-based societies in which everybody has the power to control productive assets and resources; influence over the decisions affecting their lives and livelihoods; control over their own bodies and lives; the ability to develop their full potential”.

Sexual and reproductive health and rights (SRHR) are fundamental to gender equality, enabling women and girls to make autonomous choices essential for full societal participation. The EU has both the duty and the legal competence to uphold SRHR as a core part of its Gender Equality Strategy. Ensuring access to SRHR enables women and girls to make autonomous decisions about their bodies, relationships, and futures – decisions that are essential for their full participation in education, employment, and public life. The EU needs to ensure that women and girls in all their diversity have access to sexual and reproductive healthcare services. That there are EU member states that criminalize abortion or make it practically inaccessible is unacceptable.

Another aspect of our mission statement is the firm belief that autonomy over one's own body is a right and not a privilege; access to health care should be accessible for each person living in the EU. Currently this access is not equal, with those women and others without any papers having great difficulty to access health care. PICUM, the Platform for International Cooperation on Undocumented Migrants, has done a lot of collective analysis on this from multiple angles (see for one of the latest publications: https://picum.org/wp-content/uploads/2023/12/Migration-status_A-key-structural-social-determinant-of-health-inequalities-for-undocumented-migrants_EN.pdf). We do not have specific evidence to add onto their analysis, other than the flag that a feminist approach to health should focus on what kind of health care is accessible and who can access it. **It is equally unacceptable that undocumented women in the EU cannot access health care in case of need, especially if people are afraid to use services out of fear of being deported or otherwise registered for migration control.**

Finally, we want to address the importance of supporting further research into health care solutions and communication processes from an intersectional approach. It has been proven that being a man or woman, coming from a certain social class, and/or other intersections on itself or combined, can influence the kind of care people receive and the health care that they need. This starts with biased communication patterns between clients and doctors as well as skewed information around diagnosis. This field of research and implementation still has many issues that require further development to tailor care.

This research and innovation should include the design and use of AI tools in health care, as this is a market in which companies and Universities in the EU are specializing. Our reflections with AI experts



that aim to reduce discrimination as a result from migration, gender, and other factors, point to a gap of fully diversified (end-)user panels for research and innovation (end users are the patients/clients receiving the care). This can increase bias and thus discriminatory impacts. There are good examples of how AI systems in care are developed from multiple client profiles or considering panels of a diversity of possible end-users. Still a lot needs to be developed.

8.1 Concrete Strategies

- **The EU needs to ensure that women and girls in all their diversity have access to sexual and reproductive healthcare services.** That there are EU member states that criminalize abortion or make it practically inaccessible is unacceptable.
- **There should be an intersectional approach included in which the strategy also reflects on who has access to health care. Our position is that health care should be accessible for each person living in the EU.** Currently this access is not equal, with those women and others without any papers having great difficulty to access (even basic) health care.
- **Research and innovation into health care solutions and communication processes should be developed from a gendered intersectional approach.**



9. RECOMMENDATION: Reducing socio-economic inequality through an intersectional approach.

In the Gender Equality Strategy 2020-2025 key issues concerning socio-economic inequality are highlighted such as increasing women's participation into the labour market, working on work-life balance, the role of tax in policies, gender pay gap and the pension gap. In the chapter of external relations objectives around trade policy are formulated. All these issues remain relevant, as reducing socio-economic inequality take time and a lot of effort. WIDE+ will address a few elements from its recent work that we propose for further consideration.

In the upcoming Gender Equality Strategy, we would recommend a section on the recent developments on the labour market, reflecting on the mid-term impact of COVID-19 and the digital transformation of the economy, with new kinds of entrepreneurship and platform work.

Regarding trade policy it is most relevant to further develop theory and practice around trade impacts of current trade policy. More evidence-based advice is needed to reduce gender biases in tax policies (for example issues around taxing second income earners, pink tax, etc.). And a critical review of the impact of austerity policies by EU member states are needed as part of this chapter. **More public investment, such as in the development of a strong European digital sector, might contribute to more economic growth, according to many economists.**

In addition to addressing the vertical segregation of the labour market (see the Directive on improving the gender balance among directors of listed companies), we would also encourage a reflection on how to rebalance horizontal segregation. In other words, we propose to address patterns of overrepresentation of women in care and public sectors, vis-à-vis an underrepresentation in STEM sectors (science, technology, engineering and mathematics). This is not only a matter of a disproportion in gender balance. It interconnects with difference in gender pay.

To sum it up, we call on the EU to reflect global trends in labour connected to EU's macro-economic policies around social protection, labour conditions, trade, tax and the internal market. We believe that the digital transformation as well as geo-political developments (especially the policies of the US, Russia and China) informs gender socio-economic inequality and efforts to reduce this.

WIDE+ would also recommend the ratification of two key ILO Conventions that are of high relevance for women in the labour market. It concerns to Convention 189 on domestic workers and Convention 190 on Violence and Harassment in the World of Work. It might not be in the mandate of the European Commission, but the EC could promote further analysis and research on the need for such conventions.

And we are highly critical of the EU's deregulation agenda, which seeks to dismantle human rights safeguards and reduce accountability. All "Better Regulation" or simplification initiatives must be subject to robust human rights and gender impact assessments, democratic oversight, and public



scrutiny. Strengthened support for civil society watchdogs, independent media, and human rights defenders is essential. Simplification of regulation in itself can be a valuable strategy, but it should not be used to pushback on the standards already put in place for the European markets in terms of safety, trustworthiness, etc. Companies that do more external harm than good (see the biggest oil companies: <https://www.thecorporategovernanceinstitute.com/insights/news-analysis/the-20-most-polluting-companies-in-the-world-esg>) will not thrive in the future if they are not able to transform their business model.

9.1 Concrete Strategies

- **We want to encourage the EU to adjust macro-economic policies** (social protection, labour conditions, trade, tax and the internal market) to account for recent economic developments. **We believe that the digital transformation as well as geo-political developments informs gender socio-economic inequality.** Effective policy measures therefor need to be aware of the new dynamics in order to be efficient in their impact.
- **WIDE+ recommends the ratification of the Convention 189 on domestic workers and Convention 190 on Violence and Harassment in the World of Work,** or if not possible, further research on the need for such Conventions or measures that could have similar impact.
- **All “Better Regulation” or simplification initiatives must be subject to robust human rights and gender impact assessments, democratic oversight, and public scrutiny.** They should not result in a lowering of current industry standards.



10. RECOMMENDATION: Promote peace processes, transnational solidarity, and prevention of violent conflict.

In response to a growing threat of violent conflict and war facing Europe, promoting peace processes and transnational solidarity for women human rights defenders is needed. This includes support for women activists in exile. We realise that calls for peace, such as ending the siege on Gaza, will be considered outside the scope of the upcoming Gender Equality Strategy. However, some of the EU programmes and commitments are connected to the promotion of civil society dialogue and peace processes. **Given the current geo-political context, we believe it is important that the EU's commitment to UNSCR resolution 1325 and UNSCR 1820 is referenced in the strategy.**

The EU must institutionalize the Women, Peace and Security agenda as outlined in UN Security Council Resolution 1325 and subsequent resolutions. In the past decade, the world registered a disturbing 50 percent increase in the number of women and girls living in conflict. Gender-responsive inclusive peacebuilding and conflict prevention are central to EU values of peace, democracy, and human rights. Women need to be equally represented in formal peace processes and post-conflict reconstruction, particularly in roles with decision-making power. The EU and EU member states must increase their efforts around this agenda. And we want to propose financial support to help document instances of sexual violence as weapon and tactic of war, thus helping to implement UNSCR 1820.

The EU can do more to allocate financial support to women human rights defenders and peace activists in their country or in exile. And they can encourage transnational collaboration among civil society. **War and violent conflict cannot last forever; investing in activists that embraces European values of democracy, peace and gender equality will pay itself back through a better equipped civil society that can lead societies away from violence.**

WIDE+ has organised multiple online meetings with feminist (peace) activists coming from different countries that are involved in war and conflict, such as with feminist peace activists in Slovenia and Colombia reflecting on past processes to promote peace during and after war. And with feminists, women rights defenders and other women from Ukraine, Belarus, Russia, Iran, Palestine and Israel. Each brings their own perspective and voice that is important to be considered. **As common thread we propose for the EU to support safe spaces for exchange and dialogue among civil society, as well as support grassroots support and movement building. It sounds hardly revolutionary, but still these spaces are often a scarcity.**

As feminists we strongly believe in a leadership model that is not developed top down but bottom up. **Through grassroots movement building, leadership skills of many should be enhanced as well as collaboration in a fractured diaspora haunted by trauma and threat.** Activists express a deep wish to connect with other across Europe as part of their capacity building. The sentiment can be described as follows: “Transnational solidarity and connection is very important in a Europe and world in which so many women individually are countering backlash against progressive values. If we are able to connect, we feel and become strong in standing up for our feminist values including respect for democracy, (peaceful) dialogue, women’s rights, and a more horizontal model of leadership. This solidarity is what



we can bring to the table” (Gea Meijers summarizing a dialogue between a Belarusian human rights defender in exile with a MEP held in November of 2024).

10.1 Concrete Strategies

- We call on the EU to re-affirm in its **strategy, the gender, peace and security agenda with acknowledgement of women and other underrepresented civil society promoting peace and human rights in diplomacy, conflict-resolution, peaceful dialogue and/or other relevant policy spaces.**
- **The EU must institutionalize the Women, Peace and Security agenda as outlined in UN Security Council Resolution 1325 and subsequent resolutions, like resolution 1820.**
- **We also want to propose to include (financial) support to women human rights defenders and peace activists in their country or in exile to build capacity and (trans)national collaboration.**

