



RESILIENT AND CONSISTENT

EXPECTATIONS OF THE EU GENDER EQUALITY STRATEGY
2020 – 2025

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//////////////////// PRELIMINARY REMARKS

The Deutsche Frauenrat (National Council of German Women's Organizations, DF), member of the European Women's Lobby (EWL), welcomes the new Gender Equality Strategy¹ 2020–2025 which the EU Commission (COM) presented to the public on 5 March 2020. German policy does not appear out of thin air: Approximately 80 percent of laws in Germany originate from the EU level. The EU finally wants to re-establish the momentum for gender-equality that has faltered over the years; the last equality strategy expired back in 2015 and austerity measures have slowed progress on the way to equality. In this regard the new strategy in March signals an ambitious departure.

But then the coronavirus descended upon us. The crisis places a disproportional burden on women; the threat of gender relations being retraditionalised looms worldwide. The gender-based dimensions of the pandemic become more significant every day. Much like a magnifying glass, it enlarges the inequalities between the genders. Adhering to the targets and time schedule of the gender equality strategy instead of pushing them into the background is therefore even more important. After all, the coronavirus crisis will change our society permanently. What happens today will determine whether our coexistence, our

¹ EU-COM. A Union of Equality: Gender Equality Strategy 2020–2025 https://ec.europa.eu/info/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_en

economy, our relationships with the world in terms of the Agenda 2030 for sustainability, will become more equal, more social, peaceful and more environmentally friendly to live in – or the opposite. Gender equality is of crucial importance in this regard.

In light of this, the DF, as the largest representative of equality policy in Germany, states its position on the individual topic areas of the equality strategy as follows.

//////////////////// SUMMARY

BEING FREE FROM VIOLENCE AND STEREOTYPES

A life free from violence is the fundamental requirement for an equal, self-determined life in freedom. Stakeholders in women's policy are increasingly discriminated against and threatened online. This is not acceptable. The COM must therefore ensure that the help system in the area of protection against violence also contains additional financial support in the area of digital violence. They must also ensure that directives to prevent and penalise criminal offences are created. Furthermore, the DF strongly urges the EU to swiftly implement their intention to conclude their accession to the Council of Europe convention on preventing and combating violence against women and domestic violence (Istanbul Convention). The DF likewise supports the commitment of the COM to motivate the Member States towards ratification of the International Labour Organisation (ILO) convention to combat violence and harassment in the world of work.

The DF welcomes the planned EU-wide communication campaign combating gender stereotypes. The transmission of discrimination-free and partnership gender norms is crucial. Particular attention should be paid to removing sexism and stereotypes. Cooperation with regulatory authorities in the advertising industry should therefore be promoted. In addition, the DF calls for algo-

gorithms and AI applications to exclude any discrimination of women in all their diversity in a reviewable manner.

THRIVING IN A GENDER-EQUAL ECONOMY

The current global financial crisis once again shows the imbalance in our economic system.

Creating jobs via an active economic and structural policy is essential in the fight against women's unemployment. In this respect, economic development must be guided by equality criteria, thus securing and considering the jobs and employment types for both women and men to an equal extent. Equality-policy criteria for state grants need to be determined for this.

An over-arching EU labour market policy must stand for women's economic independence, work to secure a livelihood, social coverage and sufficient old-age provision. In order for women to more easily pursue gainful employment, the spectrum of occupations to choose from for young women should be expanded, more full-time jobs should be created for women, professional careers facilitated and 'typically female' professional fields enhanced by means of fair pay and improved working conditions. In addition, employment subject to social security contributions from the first euro and legal minimum wages in all EU Member States should be introduced across the board.

The DF welcomes the Work-Life-Balance Directive. Member states must now implement this as soon as possible in national law and go beyond the minimum standards when doing so. The objective must be the equal distribution of paid work and unpaid care responsibilities between men and women. The EU-COM must counteract the 'part-time trap' for women and work towards flexible working hours. This includes life phase-oriented working hours. Furthermore, the DF advocates for statutory, wage, and corporate (work protection) regulations and standards on mobile gainful employment and new forms of work, as well as a discussion on the reduction of core working hours and on gender-equal job concepts.

The resolution of the COM to remove gender-discriminating taxation and social protection systems is long overdue. The DF recommends a more vigorous approach towards a taxation and social policy oriented to the individual and the elimination of joint tax assessments of spouses, since the latter fosters the outdated 'breadwinner model' and prevents – predominantly the woman – from independently securing a livelihood over the whole course of life.

The digital transition is leading to big changes in the world of work and directly affects employees. The DF calls on the COM to likewise consider the effects of the digital transformation in removing gender differences on the labour market. The key task must be to facilitate decent gainful employment for all people, i.e. to use the potential of digitalisation and minimise their risks.

Women are less often entrepreneurs, particularly in the technical sector. This is why the DF commends the fact that women's participation is to be specifically promoted as part of Horizon Europe. Promoting women in leadership positions in private equity and venture capital funds and in funds as part of the InvestEU programme must also remain a priority in times of crisis. The DF calls for supportive consultation and funding provision for women entrepreneurs in all sectors as well as incentives for female investors to proactively integrate gender factors in investment analyses and decision-making processes.

Education plays an important role in overcoming labour market segregation. This is especially true with regards to the digital transformation. The DF therefore welcomes the Digital Education Action Plan and the implementation of the Ministerial declaration of commitment on 'Women in Digital'. The DF calls for all children to have the same equal access to digital knowledge. A gender perspective has to be an integral component of pedagogical digitalisation concepts as well as in the training and advanced training of educators.

The equality strategy formulates solutions as to how the poverty of older women can be combated. As women benefit from occupational pensions far less than the average, the COM's plan to examine the accumulation

of care-related career interruptions in company pension schemes will hardly have a positive effect. Pension gaps can only be closed via the equal distribution of gainful employment and care responsibilities. Political incentives, such as parental allowance, can facilitate this: Men that claimed parental allowance (alone) took on more care responsibilities on a long-term basis. As schools, childcare service facilities and care provision were closed due to the coronavirus, the unequal distribution of care responsibilities has increased the burden on women. The COM must appeal to the Member States and take suitable compensatory measures.

In order to overcome the gender pay gap, decisive actions are required. The planned directive on pay transparency is a crucial first step. Therefore, as an important initiative, it is imperative that it is carried out within the originally planned time frame. By the end of 2020 the Commission should present binding measures on pay transparency. Political and economic measures for this purpose must therefore be immediately set in motion. The follow-up on the Council conclusions of June 2019 'Closing the Gender Pay Gap' must be implemented with urgency.

The equality strategy emphasises the importance of public care service provision. The DF welcomes the revision of the Barcelona targets as well as the intention of using the Child Guarantee in 2021 to focus on the most significant barriers which prevent children from accessing the necessary services for their well-being and personal development. Similarly, in the field of public infrastructure for outpatient care there is much to be done. Women with care responsibilities often have to reduce their employment or stop working altogether. The DF welcomes that the EU COM wants to finance high-quality care services for children and other relatives with funds from the European Social Fund Plus and make these services affordable.

LEADING EQUALLY THROUGHOUT SOCIETY

The coronavirus crisis clearly shows the importance of diversity for representation on decision-making committees. That the COM wants to make the equal representation of women and men in leading positions in business

and politics a reality is thus positively greeted by the DF. Cooperation with EU-wide projects such as the European Gender Diversity Index and cooperation with the European Institute for Gender Equality (EIGE) are important measures. It is particularly pleasing that the COM wants to renegotiate the directive on leadership positions. The objective to achieve equal representation in the College of Commissioners by 2024 is necessary. At least as important as this is, however, equal representation in the EU parliament after the next election. The COM must stand up for equal representation on the lists of candidates for European Parliament elections according to the alternate filtering-in system. Many EU countries are already making sure that parity is possible in national parliaments. If it works on a national level it should also be feasible on the EU level.

GENDER MAINSTREAMING AND AN INTERSECTIONAL PERSPECTIVE IN EU POLICIES

The DF welcomes that the COM wants to integrate gender perspectives in 'all major commission initiatives'. This also includes carrying out equality initiatives as planned. They should not, under any circumstances, be postponed or shelved due to working plan changes as a result of the coronavirus. It is very welcome that the COM has agreed on an intersectional perspective in EU policy and that it wants to take all dimensions of discrimination into account as part of its equality policy. In doing so it should, however, not involve hierarchising intersectional discrimination nor victimising people affected by (repeated) discrimination. The objective must be the radical creation of economic, political and social human rights-based equality.

FUNDING ACTIONS TO MAKE PROGRESS IN GENDER EQUALITY IN THE EU

The DF acknowledges the aspiration to apply gender mainstreaming in Multi-Annual Financial Frameworks (MFF) 2021–2027 on the programme level, yet regrets that COM has not declared an intention to design the budget process in future in a gender-neutral way in general. To do this, the concept of gender budgeting must further be applied in a reviewable manner to all fields and furnished with

indicators and a monitoring system. Joint mechanisms within and between the Member States are vitally important at this point in time. This also includes a strong taxation policy that aims to redistribute wealth. In the DF's opinion, funds must flow above all into the expansion of the care economy and the public provision sector.

ADDRESSING GENDER EQUALITY AND WOMEN'S EMPOWERMENT ACROSS THE WORLD

The DF welcomes the goal of the COM to name women's empowerment as the 'core objective of EU external action' and the use of gender mainstreaming in the budget process of the EU's external actions. The DF generally welcomes the goals of the third gender action plan (GAP III) as well as the external investment plan and calls for their rapid implementation. Access to education, protection from violence, economic empowerment, sexual and reproductive health, and the rights of women and girls must all be integral components of the action plan.

The new EU Action Plan on Human Rights and Democracy has to therefore contribute to ending all discrimination based on gender. The UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) is the most important and comprehensive legal document in this respect. The EU must accede to the CEDAW as well as the UN Convention on the Rights of Persons with Disabilities and quickly implement it.

It is imperative that gender equality is also actively promoted in trade policy as a key competence of the COM. The DF calls for the COM to retain successes hard won from trade agreements in labour law or social legislation, to ensure a high degree of protection in consumer and data protection, and to ensure universal access to public services.

CONCLUSION

The DF welcomes the long-awaited Equality Strategy and its focal points of combating violence against women and girls, advocating the rights of women, the role model function of women's equal representation in leadership

positions, the closing of gender gaps, the gender-based digital transition, and the integration of a gender perspective in all important areas of policy and financing streams of the EU.

The institutional measures in place show that movement in the right direction can be made towards advancing equality in the EU by means of action plans with a focus on gender, commission members for equality incl. task force, gender mainstreaming in the budget process, collection and transfer of gender-specific data, and others. Yet there is no concrete action plan with (SMART) targets and clear coordination to ensure that all portfolios work on equality-oriented regulatory impact analysis and that gender budgeting is implemented for gender-equal control of the budget.

The DF expressly welcomes the COM's intention to drive forward the EU's ratification of the Istanbul Convention. Furthermore, the DF commends that the important topic of care is considered in the strategy and taken as a starting point to work towards a Care Deal for Europe². Last but not least, the DF would like to emphasise the very important commitment established in this strategy. That is, the commitment to integrate a gender perspective in all EU policies and important initiatives of the COM, such as those on climate change, health, digitalisation and the EU budget by fully implementing gender mainstreaming. Ultimately, the European Union must once again become the driving force behind gender equality – especially considering the increase in right-wing populism with its regressive understanding of gender norms and antiquated perception of women.

The DF stresses that successfully tackling the negative economic and social consequences of the coronavirus pandemic is only possible in line with the present strategy.

Significant steps backwards for equality is a threat presented by the ongoing crisis. This is because political measures for dealing with the virus neglect the everyday realities of women and girls and are based on gender norms that were considered obsolete. For our society to

emerge from this crisis more equal and aware than it was when it fell into it, the DF advocates for extensive changes, especially in economic and finance policy. The DF positively acknowledges the high proportion of women in the coronavirus response team initiated by the COM president, yet notes that the equality commissioner Dally is not among them to move forward on gender-equal solutions. As in the Multi-Annual Financial Frameworks and other measures intended to cushion the economic and social crisis, the new financing programme on New Generation Europe must ensure that the everyday realities of women and girls are considered to the same extent. By way of example, the European Green Deal must focus on gender equality as a declared strategic target in order to fully exploit the potential of these measures and to work towards a sustainable, inclusive Europe. Similarly, there should be no deviation from the goal of the next framework programme for research and innovation Horizon Europe to continue providing funds for gender-based research. The EU must use its established leading role in order to ensure that existing EU laws on equality are implemented on national levels, including via further incentives and effective sanctions for the Member States.

² More: EWL, Purple Pact, A Feminist Approach to the Economy, https://www.womenlobby.org/IMG/pdf/purplepact_publication_web.pdf

//////////////////// BEING FREE FROM VIOLENCE AND STEREOTYPES

END GENDER-BASED VIOLENCE

The DF welcomes the fact that the ending of gender-based violence is the first priority of the new equality strategy. After all, a life free from violence is the fundamental requirement for an equal, self-determined life in freedom. The coronavirus shows just how far our social realities are from this goal, and just how much gender relationships are still often characterised by male violence: More cases of domestic violence are currently being recorded in many countries. Political circles must react quickly and unbureaucratically and find solutions.

For this reason, the DF calls for the following.

- /// The help system in the area of protection against violence to receive additional financial support in order to maintain and expand its provision.
- /// In this respect the aspect of violence prevention 'focusing on men, boys and masculinities will be of central importance' (p. 5).

The Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention), represents the European region's first ever internationally legally binding instrument for comprehensively tackling all forms of violence against women. The DF likewise supports the commitment of the

COM to motivate the Member States towards ratification of the International Labour Organisation (ILO) convention to combat violence and harassment in the world of work (p. 5), as well as all other planned measures relating to this problem area.

The DF calls for the following.

- /// The EU must for these reasons definitely conclude their accession to the Istanbul convention (p. 4) in order to implement international standards.
- /// The EU network on the prevention of gender-based violence and domestic violence (p. 5) must be expanded to an EU-wide monitoring programme within the meaning of the Istanbul convention. The planned EU-wide data gathering could be integrated in this (p.6).
- /// Regular data gathering in terms of an ongoing monitoring programme to be established.
- /// The rapid ratification of the ILO convention to combat violence and harassment in the world of work (C 190) by all EU Member States.

The DF welcomes that the COM wants to get a Digital Services Act (p. 5) off the ground that clearly regulates the obligations of online platforms in relation to their users. The increasing discrimination and online threats towards women who are active on these platforms is unacceptable. In order to effectively tackle such digital violence, the DF calls for the following.

- /// A real name obligation should not be introduced to social networks.
- /// The introduction of a new criminal offence to the benefit of victims of digital violence. Digital violence against girls and women can be systematically recorded and observed in this way.
- /// More transparency must also be created, by way of example via a labelling requirement for bots.
- /// In addition, an independent inspection body should be created to better monitor the deletion activities of digital services.
- /// Furthermore, existing advisory facilities and their connections to the topic 'digital violence' must be financed and the availability of advisory facilities for people affected by digital violence must be improved, both online and locally.

COMBATING GENDER STEREOTYPES

For a gender-equal, self-determined life free from discrimination and violence, overcoming role stereotypes is key. To do this, female and male gender norms must not only be completely rethought, they must be newly negotiated in all areas of society in EU Member States. The ongoing coronavirus pandemic makes this issue even more pressing. It shows that the crisis is reinforcing gender roles and stereotypes that we believed were overcome a long time ago. Studies show that 'political instability, threats and fast changes lead people to justify and defend existing systems and institutions. In such times, traditional values such as gender norms are seen in a more appealing light because they create meaning and a sense of stability.'³

The planned EU-wide communication campaign combating gender stereotypes (p.7) must therefore target the current retraditionalisation in particular. In order to successfully overcome gender stereotypes, the educational systems of the EU national states play a decisive role. Particular attention must be paid to removing sexism. The DF calls for the following.

- /// Fair gender norms free from discrimination to be conveyed right from the beginning at all educational facilities.
- /// In addition to the educational sector, gender stereotypes must be addressed in the fields of youth work, social work, the labour market and in the digital space.
- /// Sexist and stereotypical advertisement must be fought against across Europe and banned from public space. The exchange of good practices in the fight against sexist and stereotypical advertisements should be encouraged both in cities and municipalities, as should the cooperation with advertising industry regulatory bodies on the European, national, regional and local levels.

On the subject of artificial intelligence (AI), the DF believes that the significance of algorithms should be highlighted. These processing rules are not gender-neutral per se. The DF calls for the following.

³ <https://www.sueddeutsche.de/wissen/psychologie-macht-corona-die-menschen-konservativer-1.4893648>

- /// Algorithms have to contain minimum standards and exclude all kinds of discrimination based on gender.
- /// These requirements must also apply to AI systems, as their special algorithms and rules are able to learn how to deal with uncertainty and incomplete formation, and how to develop new problem-solving strategies.
- /// Due to this complexity, the development of algorithms and AI must be carefully observed and women's perspectives in all their development stages have to be equally included.
- /// The DF welcomes the passage in the Commission White Paper on AI (p.7) and on the basic values and rights of the EU, including non discrimination and gender equality.

The DF also commends that the Framework Programme for research and innovation Horizon Europe (p.7) is intended to combat potential gender-based discrimination in the area of AI and contribute to evidence-based policy. The DF calls for the COM to do the following.

- /// Finance more in-depth research that recognises, by using algorithms and AI, gender inequalities and intersectional discrimination.
- /// On this basis directives for their gender-neutral development and application must be formulated in a way that recognises and reaches women in all their diversity.
- /// The COM must also obligate companies to design and use algorithms in an ethical, responsible and discrimination-free way.

//////////////////// THRIVING IN A GENDER- EQUAL ECONOMY

REDUCTION OF GENDER-BASED DIFFERENCES ON THE LABOUR MARKET

The imbalance of our economic system is once again illustrated by the current global financial crisis caused by the coronavirus. An economy oriented to markets, growth and profit at any cost is in many ways more susceptible than an economy which focuses on the well-being of people and the environment. Gender equality is one of the prerequisites in such a people-friendly economy. Women currently lose their employment more often and find it difficult to return to their careers because they are predominantly employed in areas which are more affected by the crisis (tourism industry, hospitality, retail).

Creating jobs via an active economic and structural policy is essential in the fight against women's unemployment. Each economic development must be guided by equality criteria, thus securing and considering jobs and forms of employment of women and men to an equal extent. Equality-policy criteria for state grants need to be determined for this.

An over-arching EU labour market policy must stand for women's economic independence, work securing a livelihood, social coverage and sufficient old-age provision,

- regardless of whether a woman is living in a partnership or not. Legal disincentives that lead to the reduction of gainful employment of women and encourage the 'breadwinner model' must be abolished. The COM must table suggestions for measures to increase the gainful employment and purchasing scope of women. Improving the gainful employment of women requires, in the opinion of the DF,
- /// that companies should receive EU funding only if they can prove a corporate equality policy,
- /// the expansion of the spectrum of occupational choices for young women in order to work against industry-specific segregation on the labour market,
- /// more full-time jobs for women,
- /// the encouragement of women's professional careers and their advancement opportunities e.g. via part-time jobs for management roles,
- /// the revaluation of 'typically female' occupational sectors by means of fair pay and improved working conditions,
- /// the EU-wide introduction of gainful employment subject to social security contributions from the first euro,
- /// and the introduction of a statutory minimum wage across the board in all EU Member States.

The DF welcomes the Work-Life-Balance Directive (p.9) as a minimum standard for leave due to family reasons and flexible work regulations for employees. In particular, women who reduce their working times due to family care responsibilities often land out of no choice of their own in 'part-time traps' with long-term consequences for income, career opportunities and pension claims.

- The DF calls for the following.
- /// The COM must ensure that the Member States properly implement and apply this directive. The COM must urgently appeal to the Member States to go beyond the minimum standards. Equal redistribution of paid gainful employment and unpaid care responsibilities between men and women must be the goal.
- /// The COM must likewise have an influence on flexible work time organisation and call on the Member States to deal with the topic of life phase-oriented working times. Employees should receive the right to determine

the duration and distribution of their working times themselves, while employment even below the full-time level should be enough to secure a livelihood.

The digital transformation i.e. the increasing use of ICT, does not automatically solve this compatibility problem – it is actually the opposite, as clearly shown by our current experiences of ‘home schooling’ and working from home. The National Council of German Women’s Organizations thus calls for

- /// statutory, wage and corporate (work protection) regulations and standards on mobile gainful employment and new forms of work,
- /// a discussion to be encouraged on shortening core working hours with regard to the forecast productivity increases in companies and on time resources newly acquired by using digital means,
- /// and the encouragement and expansion of gender-equal and more flexible job and working time concepts that allow women and men alike to enjoy a balance between work and care responsibilities.

The intention of the COM to dismantle gender-discriminating taxation and social protection systems (p.10), is sensible and long overdue. It is disappointing that the COM only wants to develop guidelines on how negative incentives arise from national taxation and social protection systems for secondary owners. For Germany, and likely also for other EU Member States, these mechanisms have been sufficiently analysed and have been substantiated with comprehensive data material.

The DF calls for a more vigorous approach in this regard.

- /// The COM must speak out for a taxation and social policy oriented to the individual and against the joint tax assessment of spouses, because the latter fosters the outdated ‘breadwinner model’ and prevents the independent securing of a livelihood – predominantly among women – over the whole course of life.

The digital transition is leading to huge changes in the world of work. The DF thus calls on the COM to consider the effects of the digital transformation when removing gender differences on the labour market. The key task

must be to facilitate decent gainful employment for all people, i.e. to use the potential of digitalisation and minimise its risks. The DF calls for the following.

- /// Information on long-time labour market and income perspectives for gender-equal career orientation and advisory services to be made available.
- /// The work and social law position of (solo) freelancers to be researched and their employment perspectives to be analysed and the effects on women’s access to employment relationships subject to social security contributions and for securing livelihoods to be presented.
- /// Work towards ensuring that selection criteria and algorithms of software used in staff recruitment and development consider abilities, perspectives and biographies, and that they are free from discrimination and are reviewable.
- /// That the risks of future substitutability of the selected field of employment are presented to women in career advice.
- /// That men and women are quantitatively and qualitatively encouraged in the scope of (company-based) advanced and continuing training relevant to digitalisation.

Unlike men, women work less often in leading positions and start businesses less often, especially in the technical area. The proportion of women in start-ups is particularly low. The digital transformation is changing forms of work. This should be used as a means of promoting equal distribution of women and men in leading positions and to create possibilities for women entrepreneurs. The DF therefore welcomes the targeted actions to promote women’s participation in innovations as part of Horizon Europe including a pilot project to promote women-led start-ups and innovative small and medium-sized entrepreneurs (p. 10). The DF calls for the following.

- /// The encouragement of more women in leadership positions in private equity and venture capital funds as part of the InvestEU programme (p. 10) must remain a priority even in times of crisis in order to develop sustainable solutions from diverse providers.
- /// Career advancement opportunities of women and men must be separated from corporate attendance requirements in the context of the digital transformation.

/// Supportive advisory services and financing provision for women entrepreneurs must be developed and offered in all industries, including in the service sector.

- /// Incentives for women investors must be created to proactively integrate gender factors in investment analysis and decision-making processes, so that business founded by women can be promoted in the area of digitalisation.

REALISATION OF EQUAL PARTICIPATION OF WOMEN AND MEN IN VARIOUS PROFESSIONAL FIELDS

The horizontal and vertical gender-based segregation of the labour market is a dominant characteristic of our economic system and a significant contributing factor to the disadvantages faced by women. A ‘gender-equal Europe’ must overcome this divide and understand equality as an integral component of labour market and economic policy.

The topic of education plays a significant role in overcoming labour market segregation. This is especially true with regards to the digital transformation. The DF therefore welcomes the Digital Education Action Plan (p. 11) and the implementation of the Ministerial declaration of commitment on ‘Women in Digital’ as well as the creation of the Women in Digital Scoreboard. The DF thus further calls on the COM to do the following.

- /// Facilitate the same access to digital knowledge for all children, teenagers, and adolescents, in particular girls.
- /// Integrate gender perspectives in all pedagogical digitalisation concepts.
- /// Integrate the subject of digitalisation and gender into education and advanced vocational education and training in teaching positions, as well as in the initial and continual education and training of educators.
- /// Supplement the curricula of all study courses with the necessary teaching content on digital transformation and implement digital transformation in universities in a more gender-equal way.

The DF welcomes the COM’s proposal for a Council recommendation on vocational education and training (p. 11) and calls on the COM to do the following.

/// Design career advisory service provision in all responsible structures in a gender-aware manner in relation to activities, occupations, and requirements in the context of digital development.

- /// Design vocational education and training provision without prejudice in the wake of digital further developments regarding activities, occupations, competencies and opportunities.
- /// Describe job profiles for occupations while avoiding gender stereotypes and establish digital competencies for dual vocational and academic pathways independent of industry.
- /// Examine whether the vocational training agreements in STEM occupations are different for girls and women as well as boys and men in order to ensure discrimination-free interaction with female trainees.

COMBATING THE WAGE AND PENSION GAP BETWEEN WOMEN AND MEN

The COM is correct in establishing that older women are more in danger of poverty than men and ascribes this to women’s lower participation in gainful employment and pay. To combat this, the strategy formulates direct solutions such as actions to raise wages and for pay transparency (p. 12). Alongside these proposals, for the immediate reinforcement of the pension insurance systems it is recommended that occupational pension schemes be examined for disadvantages caused by care-related career breaks (p. 13). Women benefit from occupational pensions far less than the average. An examination of company pension schemes, as stated by the COM, will thus hardly have positive effects for women. Closing the gender pension gap has to be approached in a more direct and broad manner.

The DF calls for the following.

- /// All Member States must organise the old-age provision of women who are now retiring in a way that secures livelihoods, and the states must also consider future pensioners. In this respect it must be possible for pension rights to be individually obtained. Coverage via the spouse (widow’s pensions) is in light of higher divorce rates an obsolete model for future women pensioners.

/// Combating the pension gap must go hand in hand with combating the gender care cap, i.e. by fairly redistributing gainful employment and care responsibilities between women and men.

In almost all occupational ranges, there are significant wage differences between women and men. Decisive actions from both legislature and the social partners are necessary for overcoming the gender pay gap.

The DF calls for the following.

/// A first step in this regard is a transparent, comprehensive assessment process on gender-diversified pay analysis in companies.

/// The implementation of the Council conclusions of June 2019 'Closing the Gender Pay Gap' (p. 14/15) are necessary steps and cannot be postponed.

CLOSING THE GENDER PAY GAP

In the DF's opinion, fair sharing of care responsibilities constitutes the basic requirement for gender-equal involvement in all areas of society and most notably for women's participation in gainful employment. The COM only refers to 'caring responsibilities' in their strategy. In the DF's view, the Equality Strategy must urgently extend its view to housework: Housework is included in the quoted data (p. 14) on varying participation, yet not in the demands. Meanwhile, the gender care gap has been established as an indicator for assessing this gap in care responsibilities. In the EU on average, women carry out 70% of the house and care work, i.e. 22 hours a week, while men only carry out nine hours. In the wake of the coronavirus pandemic and the policy measures decided upon in this context, such as the closing of schools and childcare and care provision, there are already signs that this disparity is growing.

/// The COM has to more clearly formulate this general principle of gainfully employed adults with a duty of care, and make this a stipulation. Moreover, men's participation in house and care work must be further promoted.

/// The COM must likewise encourage the Member States to adopt compensatory measures that guarantee, for women especially, an individual securing of livelihood in the coronavirus crisis.

Work distribution in relationships is subject to patterns that quickly become permanent in daily life and lead to a retraditionalisation of gender roles. Political incentives such as parental allowance could be effective against this. Men that claimed parental allowance (at times alone) took greater part on a longer-term basis in care responsibilities. With the Work-Life-Balance Directive (WLB), as mentioned above, the EU has made progress. Yet, in the DF's view, the implementation in Germany in terms of encouraging fathers to participate in care responsibilities does not go far enough. This is because the paternal leave around the time of birth as demanded in the directive is in no way covered by the regulations on parental leave and parental allowance. In this respect the DF welcomes the call of the COM to go beyond the minimum standards laid out in the WLB.

The DF thus calls for the following.

/// The introduction of paid leave for fathers and co-mothers. Such leave should amount to at least two weeks within the first 30 days after birth and be financed from tax funds.

/// In order to redistribute care tasks, a caregiver leave income compensation must be introduced along the same lines of the parental allowance.

The Equality Strategy emphasises the importance of infrastructural public provision for care. The objective of a high-quality and above all needs-based structure of provision has not yet been achieved, which continues to prevent women from making self-determined decisions about the extent of their gainful employment. The DF thus welcomes the revision of the Barcelona targets as well as the intention of using the planned Child Guarantee in 2021 to focus on the most significant barriers which prevent children from accessing the necessary services for their well-being and personal development. Similarly, in the field of public infrastructure for outpatient care there is much to be done. Demand massively exceeds supply. Women with

care responsibilities often have to reduce their employment or stop working altogether. The DF welcomes that the COM is calling on the Member States to expand care services for children and other relatives and make these affordable, and to support these processes via investments from the European Social Fund Plus and other funds.

The coronavirus crisis makes it clearer than ever that the so-called system-relevant occupations, such as those in the care and health sectors, are undervalued – areas in which predominantly women work.

/// As a result, the crisis should lead to their revaluation, i.e. fair pay for these professional activities.

/// Political and economic measures for this purpose must therefore be immediately set in motion. The planned directive on pay transparency is a crucial first step. Given that it is an important measure, it is imperative that it is carried out in the originally planned time frame. By the end of 2020 the Commission should present binding measures on pay transparency.

//////////////////// LEADING EQUALLY THROUGHOUT SOCIETY

Politics, business and society can only be sustainably modernised when women are equally involved in leadership and decision-making positions. Similarly, digital transformation, climate protection and the reinforcement of societal cohesion will only succeed if women are actively involved in leading positions. Especially in the coronavirus crisis, it is clear how important diversity is when it comes to representation on decision-making committees. For example, the recommendations for the gradual return to social normality from the German National Academy of Sciences Leopoldina in mid-April 2020 lacked the perspectives of single parents and families with children in need of care. There were only two women among the 26 members of the committee. Scientific and political committees, such as the Commission's advisory panel on COVID-19, which offers advice for the future in times of crisis, must be formed according to obligatory diversity criteria. Key to this is a balanced representation of women and men, which is happily the case in the COM Coronavirus response team. The DF is therefore pleased that the COM has named the realisation of an equal representation of women and men in leadership positions and politics as a target. The cooperation with EU-wide projects such as the European Gender Diversity Index, the support of the Member States in the development and implementation of more effective strategies as well as the cooperation with the European Institute for Gender Equality (EIGE), are all important.

It is particularly pleasing that the COM wants to reopen negotiations on the directive on leading positions (p.16), which aims for a 40 percent quota in companies of the under-represented gender. Germany has itself consistently blocked the implementation of the directive in the past. Germany's endorsement of the directive on leadership positions in the Council of Europe, or at least its abstention in the vote, would clear the way in many Member States for stronger participation of women in the private economy and the public sector.

The goal of equal representation in the College of Commissioners (p. 17) by 2024 is welcomed by the DF. The goal, by the end of 2024, to achieve gender parity on all management levels must be consistently pursued.

/// At least as important as this, however, is equal representation in the European Parliament after the next election. It must therefore be urgently examined as to whether the COM must do significantly more for the implementation of this second goal than simply promoting the participation of women as voters and candidates in the 2024 European Parliament elections in collaboration with the European Parliament, national parliaments and civil society (p. 16).

/// The COM should stand up for equal representation on the lists of candidates for European Parliament elections according to the alternate filtering-in system. Many EU countries are already making sure that parity is possible in national parliaments.

//////////////////// GENDER MAIN- STREAMING AND AN INTERSECTIONAL PERSPECTIVE IN EU POLICIES

The strategy of gender mainstreaming (GM) was bindingly established on all EU levels back in 1997 via the Treaty of Amsterdam. However, it is certainly positive that the Equality Strategy again explicitly states that all 'core challenges affecting the EU today' have a 'gender dimension'. It should go without saying that challenges which are less central also have such a dimension. Thus, it is only a first step when the COM wants to integrate a gender perspective in 'all major initiatives' during the current mandate (p. 16). This also includes carrying out equality initiatives as planned. They should not, under any circumstances, be postponed or shelved due to working plan changes as a result of the coronavirus. After all, tackling the crisis cannot succeed without a gender perspective on the health, economic and social problem areas. It is very welcome that the COM has agreed on an intersectional perspective in EU policy (p. 19). This means that they want to consider, as part of their policy on gender equality, all dimensions of discrimination that are often cumulatively and repeatedly experienced based on gender, ethnic origin, skin colour, sexual orientation, religion or world view, age, disability, social class, and often in combination with one another. The DF calls for the following.

/// The European Green Deal must therefore focus on gender equality as a declared strategic goal in order to fully exploit the potential of these actions. Although a start, actions such as the Building Renovation Wave (p. 17) are not enough.

/// The broad subject of digitalisation (p.18) must not be simply reduced down to new digital competencies for girls and women (Chapter 2).

/// In the area of healthcare too, gender-specific studies, statistical surveys and valid data in regard to diagnostics, illnesses and therapy, including medicalisation and aftercare, are often lacking. The DF welcomes the fact that the EU Beating Cancer Plan incorporates gender-specific aspects and that regular exchanges on good practices between Member States and stakeholders are to take place (p. 19).

/// Gathering intersectional data should, however, not involve hierarchising intersectional discrimination nor victimising the people affected by (repeated) discrimination. The objective must be the radical creation of economic, political and social human rights-based equality.

//////////////////// FUNDING ACTIONS TO MAKE PROGRESS IN GENDER EQUALITY IN THE EU

The DF acknowledges that the COM is looking at the gender-related effects of its activities and at the question of how the EU budget can be assigned in the context of gender equality in the Multi-Annual Financial Frameworks (MFF) 2021–2027 on the programme level according to the gender mainstreaming (GM) concept. Equally pleasing is that the proposed COM Regulation(2018) includes 375 'specific "enabling conditions", requiring a Member State to have in place a national gender equality strategic framework' in order to be able to make use of the funds (p. 19). A tool for gender mainstreaming is gender budgeting. The DF regrets that the COM has not declared its intention to organise and control the budget in a more gender-neutral way in the future. In the last MFF (2014–2020) there were declarations of intent to integrate 'gender equality aspects' in budget processes. However, a recent internal expenditure verification of the current EU programmes showed that gender equality has not been considered in the EU budget to the same extent that, for example, climate change or biodiversity has been. The DF thus calls for a much stronger commitment to gender mainstreaming in all policy fields for the MRF 2021–2027. To do this, the concept of gender budgeting must further be applied in a reviewable manner to all fields and

furnished with indicators and a monitoring system. Particularly in the coronavirus crisis, concrete measures such as the 'Citizens, Equality, Rights and Values Programme' or the 'Asylum and Migration Fund' (p. 20) must be provided with solid financing. The DF further calls for the following.

- /// Financing means must be invested in a gender-neutral way in the crisis and gender-related effects must be examined (regulatory impact assessment).
- /// Women's and men's jobs must be secured and promoted to the same extent by means of investment measures (gender budgeting).
- /// Household-related services should receive public funding.
- /// Equality-policy standards must be fixed as criteria for state grants, e.g. companies that receive grants or subsidies from the economic and development funds must prove that this money benefits all genders in the same way and that it is also conducive to promoting women in all levels of management. Minimum quotas must be taken into account here.
- /// Models for a gender-equal refinancing of the crisis must be developed during crisis management.

Joint mechanisms within and between the Member States are vitally important at this point in time. This also includes a strong taxation policy that aims to redistribute wealth. Proposals on issuing 'corona/euro bonds' via the European Central Bank (which is siphoning 37 billion euros into cohesion policy) that loosen the strict criteria of the Stability and Growth Pact in order to facilitate public investment in the Member States are very welcome measures overall. In this respect the DF calls for the following.

- /// The expansion of the care economy and public service sector.
- /// The EU must also realign the Cohesion Fund as part of the current Multi-Annual Financial Frameworks (MFF) (2014–2020) in order to put Member States in the position to invest in social cohesion, which is of decisive importance in light of the uncertainties and long-term socio-economic, health and ecological consequences of the pandemic.

//////////////////// ADDRESSING GENDER EQUALITY AND WOMEN'S EMPOWERMENT ACROSS THE WORLD

The DF welcomes the COM's goal to name women's empowerment as the 'core objective of EU external action' (p.21). The DF likewise welcomes the planned targets for the third Gender Action Plan (GAP III, p. 21) and calls for it to be enacted quickly. The focal point of the previous action plans on gender equality and women's empowerment in external relations (GAP II 2016–2020) is rightly so the ending of violence against women and girls as well as the promotion of women's economic and social participation, including access to education. The DF stresses its advocacy for ending worldwide violence against women and girls, welcomes the Spotlight Initiative with the United Nations, and is taking part in the #WithHer campaign (p.21). The DF regards the approach of gender mainstreaming in budgeting processes in the EU's external actions (p. 22) as an important foundation for achieving the declared objectives.

The DF calls for the following.

- /// The equality of women and men to actually be a solid component in all programmes and be provided with solid financing.

//////////////////// CONCLUDING EVALUATION

- /// The protection of women's and human rights activists and their organisations. GAP III must also include the worldwide fight against human trafficking and the work exploitation of women, the ending of worldwide femicide, and the solid financing of the UNFPA goals. The human rights of girls and women as well as their political, citizen's and sexual and reproductive health and rights must be safeguarded.
- /// The new EU Action Plan on Human Rights and Democracy (p. 21) has to therefore contribute to ending all discrimination based on gender.
- /// The UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) is the most important and comprehensive legal document in this respect. The EU must accede to the CEDAW as well as the Convention on the Rights of Persons with Disabilities and quickly implement it.
- /// It is imperative that gender equality is also actively promoted in trade policy as a key competence of the COM. This also includes retaining successes hard won from trade agreements in labour law or social legislation, ensuring a high degree of protection in consumer and data protection, and ensuring universal access to public services.
- /// The DF welcomes the External Investment Plan (p. 22) with which it is intended to strengthen women's economic independence in particular. Funding should flow into education and advisory service measures, as well as into credit solutions that specifically and sustainably promote women's entrepreneurial activities.

ENSHRINE AND IMPLEMENT GENDER EQUALITY ON ALL LEVELS!

Together with the EWL, the DF has advocated for years that EU gender policy law must once again provide the momentum behind gender equality in Europe. Presented in March 2020, the 'Gender Equality Strategy 2020–2025' states important objectives and sets programmes and measures for their achievement. But are these sufficient, especially during the global coronavirus crisis? The assessment of the Expert Commission of the Second Report on Gender Equality of the Federal Government mentions comprehensive structures and tools for implementing gender equality. The following concluding evaluation uses this assessment as a template for successful equality policy.

ACTION PLANS

To actually achieve an effect, action plans with gender-policy objectives, measures and indicators are required, as well as a coordination structure for implementation.

Action plans explicitly aimed at gender equality

- /// Action plan on gender equality and women's empowerment in external relations (GAPIII, p. 21)

Other action plans relating to gender

- /// Digital Education Action Plan (p. 11)
- /// EU Beating Cancer Plan (p. 19)
- /// EU Drugs Agenda 2021–2025 (p.19)
- /// Action Plan on Integration and Inclusion and the EU strategic frameworks (p. 19)
- /// EU Action Plan on Human Rights and Democracy 2020–2024 (p. 10)
- /// The EU Strategic Approach to Women, Peace and Security 2019–2024 (p. 21)

Evaluation and calls for action The DF welcomes the COM's intention that the 'actions presented [...] will be regularly updated and supplemented' and that their 'implementation will be monitored, and progress will be reported on an annual basis'. 'In addition to examples of good practice in the Member States, the annual reports will also include relevant data, including from Eurostat and Eurofound, as well as indicators for measuring progress, building on EIGE's annual EU Gender Equality Index. EIGE will also provide data and research to feed into the evidence-based policy-making of EU institutions and Member States.' (p. 22)

Yet the EU Gender Equality Strategy does not follow any action plan of its own which would set and schedule indicators for concrete (SMART) targets, and establish a coordination structure. This means that the principle of voluntarism still exists. A new action plan is only announced for the area 'Addressing gender equality and women's empowerment across the world'. The DF notes the following in this respect:

- /// Equality is not only important for international cooperation. The objectives of the EU Gender Equality Strategy also require a concrete action plan for the implementation in the Member States, which will bring forward the achievement of the sustainable development goals and the goals of the Beijing Platform for Action. This action plan must be furnished with objectives, measures and indicators, and must contain a coordination structure.
- /// Following the action plan on gender equality and women's empowerment in external relations (2016–2020 (GAP II)), the GAP III announced for 2020 must be provided with the necessary resources. It is likewise

imperative that the ambitious goals for the programmes of worldwide cooperation programmes designated as GG1 (programmes that are conducive to equality as well as other targets), are fixed at least 85 percent and programmes with GG2 designation (programmes that only deal with gender equality) are fixed at least 5 percent. Germany is currently a long way from seeing these figures: Funding for bilateral development programmes (GG1) was at 40 percent in 2017, while programmes designated as GG2 was at just about one percent.

DESIGN REGULATORY IMPACT ANALYSIS AND EQUALITY TOGETHER

As stated in the Second Report on Gender Equality, a gender-oriented gender impact assessment is the second crucial mainstay. The assessment additionally recommends that committees be used to share expertise on equality and for the gender-equal organisation of certain policy areas.

Regulatory impact analysis and committees in the EU Gender Equality Strategy

The EU Gender Equality Strategy explicitly states that the COM will 'integrate a gender perspective in all major commission initiatives during the current mandate' (p. 17). This will happen by means of 'the appointment of the first Commissioner for Equality, as a stand-alone portfolio, and by creating a Task Force for Equality composed of representatives of all Commission services and of the European External Action Service. The Task Force will ensure the implementation of equality mainstreaming, including gender equality, at operational and technical level.' (p. 18)

Evaluation and calls for action

The COM has been carrying out gender impact assessment since 2002.⁴ It is part of a combined regulatory impact assessment system. The DF welcomes the decision to hand over the subject of equality to a commission member. The relevant task force is also important in terms of advancing equality in the COM's areas of activity. However, in Germany too, it cannot remain the job of a task

⁴ <https://eige.europa.eu/gender-mainstreaming/toolkits/gender-impact-assessment/european-commission>

force (or portfolio) alone to ensure that legislative plans are drawn up in a gender-equal manner. The EU Gender Equality Strategy does not describe any solutions to this problem. The DF thus recommends the following.

- /// The COM must define binding standards for this assessment process. This includes the obligatory justification as to why a law is relevant for gender equality or not.
- /// The Directorate-General for each specific area should carry out the regulatory impact assessment. They should receive expert support for this, as well as the possibility of competence development. The COM should have overall responsibility for the proper use of the tools for equality-oriented regulatory impact assessment.

GENDER-EQUAL BUDGET POLICY

A gender-equal budget policy must form the third mainstay of important tools for implementing gender-policy objectives. On the European level, this is already being realised in some places by implementing measures from the European Social Fund.

Gender budgeting in the EU Gender Equality Strategy

The COM writes that their proposals for the Multi-Annual Financial Frameworks (MFF), which are currently being revised under corona conditions, 'ensure the integration of a gender dimension throughout the financial framework, and more specifically in various EU funding and budgetary guarantee instruments' (p. 19). Likewise, 'the Commission will look at the gender impact of its activities and at how to measure expenditure related to gender equality at programme level in the 2021-2027 MFF'. Here the COM refers to the result of the recently launched audit by the European Court of Auditors on 'gender mainstreaming in the EU budget' (p. 20).

Evaluation and calls for action

- The DF welcomes the COM's objective to deploy gender mainstreaming in the various fields of budget policy but observes the following.
- /// Gender budgeting must further be applied in a reviewable manner to all fields and furnished with indicators and a monitoring system.

EQUALITY EXPERTISE AND AN INSTITUTION FOR THE TRANSFER OF KNOWLEDGE ON EQUALITY

For gender equality policy to be structurally enshrined, the assessment finds that, instead of only calculating the gender-related gaps alone, such as the gender pay gap, it is necessary to regularly calculate gender-related gaps in retirement (gender pension gap), the gender lifetime earnings gap, gender-related differences in gainful employment working hours (gender time gap), time used daily for care responsibilities (gender care cap) and the gap regarding access and use of digital technologies (digital gender cap).

Equality expertise in the EU Gender Equality Strategy

The COM mentions the following calculations and gender-related data surveys:

- /// Annual EU Gender Equality Index from EIGE (EIGE, p. 22) as well as data/trend analysis on the representation of women and men in leadership positions (p. 16)
- /// Women in Digital Scoreboard (p.11)
- /// Gender-disaggregated data in the scope of COM's trade policy (p. 21)
- /// Eurostat (e.g. on the pay gap, gender-specific violence, p. 4) and Eurofound (p. 22)

Evaluation and calls for action

The DF welcomes the regular gathering of gender-related data by the institutions named by the COM. By way of example, EIGE Germany confirmed an equality index of 66.9 in 2019. This is less than the EU average (67.4).⁵ To depict society as it actually is to then adapt policy structure, it is important to include data that goes beyond gender (and relationship status). The following should be considered in this regard:

- /// Data gathering must protect citizens and consumers; be transparently gathered and also be accessible for stakeholders in civic society.
- /// The indicators must be compatible with the monitoring of global objectives (e.g. SDGs).
- /// Factors such as ethnic background, religion or faith, disability, age, sexual orientation, class and/or migration status must be included in the gathering of data.

⁵ <https://eige.europa.eu/gender-equality-index/2019>

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