EUROPEAN NETWORK
OF MIGRANT WOMEN

Submission to the Public Consultation on the Gender Equality Strategy 2026-2030

Submitted by: European Network of Migrant Women (ENoMW)

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The **European Network of Migrant Women** (EnoMW) is a feminist secular migrant-women led platform of NGOs and individual members that advocates for the rights, freedoms and dignity of migrant, refugee and ethnic minority women and girls in Europe. Our membership ranges from grassroots service providers to NGOs focused on advocacy and research. Our members cover a diverse range of subjects in the area of human rights of migrant and refugee women, with economic empowerment, anti-discrimination, and access to justice, and combatting male violence against women and girls, being the most frequent activities.

ENoMW is pleased to submit its contribution to the consultation on the Gender Equality Strategy 2026-2030. This submission underlines that **the implementation of the principle of equality between women and men is a legal obligation under EU law that must be implemented in all policy areas of the EU.** Furthermore, in both internal and external actions, the EU **must comply with the standards of CEDAW**, even as a non-signatory, and ensure that international partnerships and development cooperation in no way undermines the EU's commitment to eliminating discrimination on the basis of sex or promoting the principle of equality between the sexes. Lastly, we strongly urge the Commission to initiate the **accession of the EU to the CEDAW convention.**

1. EXECUTIVE SUMMARY

This submission emphasises the urgent need to shift from aspirational commitments to concrete implementation, accompanied by transparency, accountability, and reporting. Grounded in EU law and international human rights frameworks, we stress that real progress on equality between women and men demands adequate resourcing, and specific attention and disaggregated approach to the experiences of women and girls particularly at risk of discrimination and violence, including migrant and refugee women and girls.

Across all eight principles of the Strategy, we call for the following key actions:

- **Combat all forms of violence against women and girls**, including sexual exploitation and pornography, the commodification of women through prostitution and surrogacy and online abuse, while respecting victims' rights single-sex services and ensuring correct sex-disaggregated data collection and prohibiting victim-offender mediation in cases of VAWG, in line with the Istanbul Convention, EU VAW Directive, the EU Charter of Fundamental Rights and relevant international law. Support the process of enshrining of the right to abortion under the EU Charter.
- **Advance women's health and bodily autonomy** through equal access to sexual and reproductive health services, high-quality maternal care, and the elimination of discriminatory practices, while addressing systemic barriers faced by migrant and undocumented women. Frame menstrual health as a matter of dignity, and tackle the taxation of menstrual products. Ensure the new Horizon fund under MFF has a dedicated fund on female health.
- **Ensure economic justice and equal pay,** by recognising unpaid care work, investing in social protection and care infrastructure, and addressing labour market inequalities, particularly in the informal, care, and extractive sectors, in line with CEDAW Article 11[1] and Directive (EU) 2022/2381[2]. Support EU-wide system for the recognition of qualifications.
- **Guarantee access to education and training at all levels for all girls**, including girls with irregular status. Remove structural and legal barriers for migrant and refugee girls, in accordance with CEDAW Article 10[3]. Support MS in implementing sexuality education based on a human rights, women-centred approach.
- **Promote full and safe political participation**, addressing the intersection of legal barriers, racism and sexism in public life. Ensure that MS do not infringe on women's political participation when it concerns sex-based advocacy or SRHR. Remove legal obstacles to participation and protect women human rights defenders, online and offline, as outlined in the EU Anti-Racism Action Plan[4], and Women, Peace and Security Agenda[5].
- **Strengthen institutional mechanisms for equality between women and men** by mandating mainstreaming the principle of equality between women and men across all policy and budgetary frameworks, ensuring sex disaggregated data collection, establishing a Coordinator on Women's Rights and funding independent women's equality bodies and grassroots women's rights organisations.

1 https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women

2 https://eur-lex.europa.eu/eli/dir/2022/2381/oj/eng

3 Ibid (1)

4 https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/combatting-discrimination/racism-and-xenophobia/eu-anti-racism-action-plan-2020-2025_en

5 https://www.un.org/shestandsforpeace/content/women-peace-and-security-agenda#:~:text=UNSCR%201325%20(2000)%20is%20the,peace%2Dbuilding%20and%20recovery%20processes.

2. OUR CONTRIBUTION TO THE PRINCIPLES:

1. Freedom from Gender-Based Violence

While we strongly support the Commission's commitment to eradicating all forms of violence against women and girls, we urge the Commission to use terms that do not have conflicting or unclear interpretations. The term gender-based violence (GBV) does not have a consistent definition in international or EU law. Whereas both the Istanbul Convention and CEDAW general recommendations use the term "**gender-based violence against women**" defining it as any act of violence directed at a woman because she is a woman or that affects women disproportionately, GBV as a broad term does not identify the sex of the victim, and as such it does not need to be directed at women and girls. GBV as a term also conceals the sex of the perpetrator, or the sexist structural nature of the crime. We therefore strongly recommend that the Commission uses the term **male violence against women and girls** instead of GBV. Additionally, we recommend the following key actions, grounded in relevant legal frameworks such as the Charter of Fundamental Rights of the EU, the Istanbul Convention, and EU directives:

- **Hold the pornography industry accountable** for profiting from the abuse, exploitation and objectification of women. Recognise its role in normalising sexual violence and integrate measures to regulate and reduce its harmful impact on women's dignity and safety.
- **Explicitly recognise prostitution, including its filmed and online forms forms (pornography, web-"camming", etc.) as a form of violence against women by initiating a revision of the EU VAW directive**[6]. In doing so, adopt a survivor-centred and abolitionist approach in line with the 1949 Convention for the Suppression of the Traffic in Persons and Exploitation of the Prostitution of Others[7], Article 6 of CEDAW convention[8], the ECtHR Ruling of 2024[9], as well as the recommendations of the European Parliament Resolution on Prostitution of 2014[10] and 2023[11], CEDAW general recommendation N.38[12], and the report on prostitution of the UNSRVAWG Report of 2023[13]. This includes decriminalisation of women in prostitution, exit support programmes, provision of independent residence permits of undocumented prostituted migrant women and criminalisation of exploiters and buyers, in line with the **Abolitionist/ Nordic Model.**
- **Address surrogacy in the VAW directive, in line with the EU Anti Trafficking Directive**[14]**, as a form of reproductive exploitation** that commodifies women's bodies, disproportionately affecting migrant and economically vulnerable women[15]. Ensure legal and ethical safeguards to uphold bodily integrity in line with Article 3 of the EU Charter of Fundamental Rights[16] and the Istanbul Convention principles.
- **Guarantee victim-centred support and protection for all women,** including migrant and undocumented survivors of violence, regardless of legal status, in compliance with the Istanbul Convention Articles 4.3 and 59[17].
- **Ensure access to justice for survivors of all forms of violence against women and girls**, including technology-facilitated violence and online harassment, consistent with the right to an effective remedy under the EU Charter (Article 47)[18].

6 https://eur-lex.europa.eu/eli/dir/2024/1385/oj/eng
7 https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-suppression-traffic-persons-and-exploitation
8 Ibid (1)
9 https://hudoc.echr.coe.int/eng#%7B%22itemid%22:%5B%22002-14363%22%5D%7D
10 https://www.europarl.europa.eu/doceo/document/TA-7-2014-0162_EN.html
11 https://www.europarl.europa.eu/doceo/document/TA-9-2023-0328_EN.html
12 https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-recommendation-no38-2020-trafficking-women
13 https://documents.un.org/doc/undoc/gen/g24/078/81/pdf/g2407881.pdf
14 https://eur-lex.europa.eu/eli/dir/2024/1712/oj/eng
15 https://usercontent.one/wp/www.migrantwomennetwork.org/wp-content/uploads/ENG-Final-Migration-and-surrogacy.pdf?media=1751024790
16 https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:12012P/TXT
17 https://rm.coe.int/168046031c
18 Ibid (15)

- **Ensure access to single-sex shelters, spaces and services for female victims of male violence, including but not limited to sexual violence, regardless of the legal status of the victims,** in line with the Istanbul Convention (Article 23)[19], the EU directive on VAW (Article 30)[20], and the EU Directive on equal access to goods and services (2004/113/EC) (Preamble, Par. (16;) Article 6)[21].
- **Ensure that EU MS collect, report, and integrate into policy-making data on male violence disaggregated by sex** in line with the Istanbul Convention (Article 11)[22] and EU VAWG directive (Article 89)[23]. Such data should be based on the sex of victims and perpetrators observed at birth, not the self-declared legal sex, to avoid incorrect statistical analysis and negative impact on VAWG prevention and elimination actions.
- **Ensure that "restorative justice" and "victim-perpetrator mediation" are prohibited and not promoted nationally in cases of male violence against women,** including sexual violence, rape and trafficking in women for sexual exploitation, in line with the Istanbul Convention (Article 48)[24].
- **Male violence against women and systemic sex-discrimination must be recognised as a legitimate ground for asylum**, in line with the UNHCR Guidelines N1[25], CEDAW GR 32[26], and EUCJ rulings Joined Cases C608/22 and C609/22[27]. As such it must be mainstreamed in the implementation of the relevant Acts of the EU Migration Pact, as well as the EUAA reporting and training.
- **The principle of non-refoulement of women victims of such violence and discrimination must be respected** by all EU states, and monitored by the EU, respecting the obligations under Art 61[28] of the Istanbul Convention.
- **Ensure that appropriate resources are allocated in the next MFF at national and EU levels to supporting frontline organisations and service providers, including migrant women led,** that assist victims of and work to prevent and combat male violence against women.
- **Propose a course of action for a trilateral process with the EP and EU Council to enshrine the abortion right for women in the EU fundamental law,** which violation will constitute a **form of violence against women** and denial of fundamental right to a life from inhumane and degrading treatment, torture, and bodily integrity, in line with the EU Charter provisions.

2. The Highest Standards of Health

Women's health has been historically overlooked in research, data-collection and interventions. Most scientific studies on health are still based on male sex. In addition to this, migrant and refugee women face multiple barriers to healthcare access, including legal and administrative restrictions, language and cultural obstacles, discriminatory treatment, and institutional racism. These barriers violate women's fundamental rights as enshrined in Article 35 (Health Care) and Article 21 (Non-Discrimination) of the Charter of Fundamental Rights of the European Union[29], and run counter to the EU's obligations under the Istanbul Convention, which calls for access to healthcare for all victims of violence, regardless of legal status (Art. 4.3. and Art. 18.3)[30]. Preventing migrant women's access to health services by states is also in breach of their obligations under Article 12 of CEDAW[31], that all EU MS are bound by.

19 Ibid (16)
20 Ibid (6)
21 https://eur-lex.europa.eu/eli/dir/2004/113/oj/eng
22 ibid (16)
23 ibid (6)
24 Ibid (16)
25 https://www.unhcr.org/media/guidelines-international-protection-no-1-gender-related-persecution-within-context-article-1a
26 https://www.refworld.org/legal/general/cedaw/2014/en/102146
27 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62022CJ0608 https://www.migrantwomennetwork.org/afghan-women-en/
28 Ibid (16)
29 Ibid (15)
30 Ibid (16)
31 Ibid (1)

The strategy must also go beyond broad commitments to evidence-based care. We urge the Commission to:

- **Ensure that sexual and reproductive health information and services are accessible**, culturally appropriate, and free from coercion or discrimination, especially for migrant and refugee women, who are too often excluded from even the most basic care.
- **Encourage MS to address medical sexism and racism**, which contribute to the neglect, underdiagnosis, and mistreatment of women's pain and illness, particularly among racialised and migrant women and girls.
- **Guarantee respect, high-quality maternal and gynecological care for all women**, regardless of migrational status, and explicitly condemned practices such as obstetric violence, forced abortion, forced sterilisation, and non-consensual contraception, exploitation in surrogacy and egg harvesting, as forms of violence against women
- **Address menstrual and reproductive health as a matter of human dignity**, not just hygiene, and ensure the free provision of menstrual products, especially for women in precarious living conditions, including refugee accommodation, and addressing the unjust high taxation of menstrual products, which creates a significant financial barrier both for females attaining health and dignity, and for MS meeting their obligations to achieving substantive equality for women under Articles 3 and 12 of CEDAW[32].
- **Address the limited access of women to contraceptions which undermine women's dignity and denies control over women's reproductive choice**, a fundamental aspect of women's bodily integrity, as guaranteed in Article 3 and 35 of EU Charter.[33] Access to women's reproductive autonomy allows them to make informed decisions on when, how, and if they will have children.
- **Address the commercialisation of women's reproductive capacities**, when practiced by MS, particularly in exploitative practices such as surrogacy and egg harvesting, as a violation of human dignity, bodily integrity, and highest attainable standard of health, under the relevant provision of the EU Charter.
- **Ensure the collection and use of sex-disaggregated data as a foundation**, while also expanding to gather comprehensive data, including migration status, ethnicity and socio-economic background, all with full respect for data privacy and protection rights.
- **Ensure that MS respect the EU law prohibiting discrimination on the basis of pregnancy and maternity**, in line with EU Charter Articles 21 and 23[34], EU directives 92/85/EEC[35] (Pregnant Workers directive) and 2004/113/EC[36] (Access to Goods and Services directive), and CEDAW Articles 12 and 16[37]. This includes monitoring of MS actions in relation to maintaining and not erasing or modifying such terms as "mother", "maternity", "pregnant woman", "breastfeeding", "female reproductive status", and their definitions as related to female biological sex. The erasure or modification of these terms in law and policy by MS would constitute MS failing to implement the principle of equality between women and men and non-discrimination on the basis of sex, as mandated by EU law, including but not limited to EU Charter.
- **Ensure that the new MFF's Horizon funds include a specific allocation for research on female health**, including but not limited to sexual and reproductive health, pregnancy and maternity, adolescence female health, menopause, mental health, trauma, cardio-vascular disease, among others. Such research should take into account the situations of women affected by displacement, disability, poverty, violence and trauma.

3. Equal Pay and Economic Empowerment

We fully support the commitment to economic empowerment and equal pay. To make this principle applicable to all women on EU soil, we urge the Commission to prioritise the following actions, particularly with regard to migrant and economically marginalised women.

32 Ibid (1)
33 ibid 15
34 Ibid (15)
35 https://eur-lex.europa.eu/eli/dir/1992/85/oj/eng
36 https://eur-lex.europa.eu/eli/dir/2004/113/oj/eng
37 Ibid (1)

- **Addressing exploitation in feminised, low-paid, and informal sectors**, where many migrant women work without labour protections. This violates rights under the EU Charter of Fundamental Rights (Art. 31)[38] and the European Pillar of Social Rights[39].
- **Encouraging and supporting MS to include care and domestic work in their national GDP, and include both in the GDP of the EU,** as to ensure that thus far un- / under-paid labour performed largely by females, many of whom are migrants, is made visible and adequately reflected in economic analysis and budgeting.
- **Explicitly addressing protection of pregnant women and maternity leave in domestic work sector** as per the EU Pregnant workers directive[40] and the EUCJ Ruling C-389/20[41].
- **Supporting MS in enforcing labour and wage protections**, regardless of migration status, in line with Directive 2000/43/EC[42] and the principle of non-discrimination.
- **Ensuring that equal pay policies and the Pay Transparency Directive (2023/970)[43] implemented nationally** also cover part-time, precarious, and informal work, not just standard employment.
- **Promoting a dialogue and coherence between policies and actions on migration and labour, and ensuring the mainstreaming of equal opportunities for women and men in both, by encouraging residency and work regularisation for undocumented women**. This will also contribute to MS and EU implementing Article 59 of the Istanbul Convention[44], to reduce migrant women's economic dependency on spouses/partners and vulnerability to violence in the home.
- **Recognising and supporting unpaid care work** through inclusive social protection policies (European Pillar of Social Rights, Principle 12)[45].
- **Guaranteeing universal access to financial services, training, and entrepreneurship support**, especially for migrant women facing systemic exclusion.
- **Ensuring coherence between the Gender Equality Strategy and Gender Action Plan in the areas of labour rights, economic opportunities and economic empowerment.** EU external actions must promote women's rights, fair labour, and environmental justice. This includes monitoring and sanctioning exploitative practices in global supply chains and extractive industries, which disproportionately harm women.

4. Work Life Balance and Care

We welcome the Commission's goal of enabling all women to balance their professional and private lives. To ensure this principle applies across different groups of women, we strongly urge the Commission to explicitly address the invisible care labour, in many cases performed by migrant and undocumented women, and the structural undervaluation of care work across Europe.

- **Explicitly recognising the value of unpaid and informal care work,** which is disproportionately carried out by women, especially migrant and low-income women, often without access to social protection. This aligns with Principle 18 of the European Pillar of Social Rights[46].
- **Support MS to ensure the rights and protections of domestic and care workers**, many of whom are undocumented or employed informally, and thus excluded from labour laws, leave entitlements, and decent working conditions. This includes transposing the Work-Life Balance Directive (2019/1158)[47] with full inclusion of all workers.

38 Ibid (15)
39 https://commission.europa.eu/system/files/2017-11/social-summit-european-pillar-social-rights-booklet_en.pdf
40 Ibid (34)
41 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:62020CJ0389
42 https://eur-lex.europa.eu/eli/dir/2000/43/oj/eng
43 https://eur-lex.europa.eu/eli/dir/2023/970/oj/eng
44 Ibid (16)
45 Ibid (38)
46 Ibid (38)
47 https://eur-lex.europa.eu/eli/dir/2019/1158/oj/eng

- **Promote investment in the public care infrastructure by states in the next MFF** to reduce the outsourcing of care to vulnerable women and ensure that care is a shared social responsibility, not a burden carried privately by families or exploited labour.
- **Monitor the mainstreaming of equal opportunities for women and men in MS implementation of relevant Acts of the EU Migration pact** in the areas of migrant and refugee women's integration**,** access to child**-**care**,** fair share of care responsibilities within migrant households**.**
- **Support MS, including through MFF, in guaranteeing affordable, high-quality childcare and long-term care that is accessible** regardless of residence or legal status. In line with ILO Convention 189[48] and CEDAW General Recommendation No. 26[49] on women migrant workers, promote at the EU level the formalisation and professionalisation of care jobs, ensuring decent wages, social protections, and labor rights for care workers.

5. Equal Employment Opportunities and Working Conditions

We strongly support the goal of equal employment opportunities for all women. However, this principle must explicitly address the compounded discrimination and harassment that women, especially migrant and undocumented women, face as they are overrepresented in undervalued, unprotected, and often dangerous work environments across the EU.

- **Propose a plan for monitoring and addressing occupational segregation by sex, but also by migration status and ethnicity**, ensuring that migrant women are not systematically confined to low-paid, low-status, and informal sectors such as domestic work, care, cleaning, and agriculture. This is essential to achieving the goals of Directive 2006/54/EC[50] on equal treatment in employment.
- **Monitor, encourage and sanction MS to have domestic and care work included in labour regulations, covered by labour codes, and monitored by ministries of labour, as opposed to ministries of interior and migration.** This should include monitoring of the recruitment agency system, for both sending and receiving countries, as well as sanction against agencies and MS found engaging in exploitative practices is in EU directive 2024/36/EU (Seasonal Workers Directive)[51]
- **Ensure that EU directive 2014/36/EU (on seasonal workers) is implemented by MS without violating the fundamental rights of migrant women employed in e.g. hospitality and agriculture or other seasonal work,** in particular in relation to sick leaves as well as work**-**place health and safety protections**.**
- **Ensure labour inspections, workplace safety, and protections cover all workers**, including undocumented and informal workers, and those workers who reside in houses of their employers (domestic and care workers) in line with the European Pillar of Social Rights (Principles 5 and 10). Migrant women often work without contracts, exposing them to exploitation and unsafe conditions without recourse.
- **Support MS in preventing and combating discrimination in hiring, promotion, and access to training** in accordance with Directive 2000/43/EC and Directive 2000/78/EC.
- **Ensure that protection against violence and harassment at work in force in MS apply to all women**, regardless of legal status, and are aligned with ILO Convention 190[52] and Article 40-41 of the Istanbul Convention,[53] which require safe workplaces and sanctions against perpetrators. Include access to complaints and grievance mechanisms including seasonal workers and third country nationals in line with Article 47 on Right to Effective Remedy and Fair Trial of EU Directive 2009/52/EC (Employer Sanctions Directive)[54].
- **Support MS, including through budgetary allocations under the new MFF, in providing access to adequate and protective equipment and health measures** that consider the physical realities of women's bodies, as required by EU health and safe legislation and workplace equality standards.

48 https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::p12100_ILO_CODE:C189
49 https://www.refworld.org/legal/general/cedaw/2008/en/61897
50 https://eur-lex.europa.eu/eli/dir/2006/54/oj/eng
51 https://eur-lex.europa.eu/eli/dir/2014/36/oj/
52 https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190
53 ibid 16
54 https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:168:0024:0032:EN:PDF

- **Encourage states to include psycho-social risks such as exposure to sexism, racism, isolation, and economic dependency in workplace health frameworks**, especially for migrant women, who often face workplace bullying, xenophobia or economic blackmailing.
- **Explore the possibilities of EU-wide system of qualification recognition** and certification **for migrants**, paying specific attention to the recognition and certification of "soft skills" and/or skills that had not been formally certified in the country of origin, that many migrant women have**.**

6. Quality and Inclusive Education

We support the commitment to high-quality, inclusive, and non-discriminatory education as every girl and woman has the right to inclusive, high-quality education and training, free from discrimination.

To uphold this right meaningfully, it is recommended that:

- **Access to education is guaranteed at all levels for all girls and women**, including those with irregular status, by removing legal, financial, and linguistic barriers, in line with Article 14 of the EU Charter of Fundamental Rights[55].
- **Address structural inequalities by collecting disaggregated data** (by sex, migration status, ethnicity, and socio-economic background) and ensuring that curricula and teacher training reflect diverse experiences.
- **Prevent and respond to school-based violence**, including digital harassment and bullying, by adopting whole-system approaches.
- **Encourage MS to introduce educational programmes in high-school curriculum covering such subjects as sexuality education, female bodily integrity and boundary setting, harms of pornography, stereotyped roles of women and men, self-defense, healthy eating, online safety, among others.** Such subjects must be delivered as positive actions for girls, in safe girls-only groups by qualified specialist feminist educators. At the same time, boys must receive training on non-violent communication, equal sexual relationship, and harms of consuming pornographic materials.
- **Encourage MS to develop overall educational curriculum that do not inadvertently encourage or promote stereotyping or scientifically false ideas,** such as children "born in the body" or the possibility of humans changing their biological sex**.**
- **Support MS in implementing lifelong learning, upskilling, and qualification recognition** to enable access to quality employment, regardless of legal status and in line with the European Pillar of Social Rights and EU Charter.
- **In its external action**, while the EU is not a formal party to CEDAW, it cannot disregard the obligations laid out in Article 10 of CEDAW[56], it is imperative that equal access to education and elimination of stereotypes in all international partnerships and aid policies is promoted.

7. Political Participation and Representation

Every woman has the right to actively and safely participate in public life. However, structural, racial and sex-based barriers continue to restrict the full and equal participation of migrant and marginalised women in political and civic space across the EU. Furthermore, there is a deeply concerning trend, on the one hand, in some EU states to limit political participation and even subject to persecution women human rights defenders who advocate for preserving protection of women based on sex. On other hand, in other states, women human right defenders advocating for sexual and reproductive rights of women are symmetrically marginalised and excluded from political processes, and, at times, persecuted.

55 Ibid (15)
56 Ibid (1)

We recommend to:

- **Promote and ensure through appropriate mechanisms (such as citizens forums, CSO direct funding, legal firewalls and promotion of the removal of institutional and legal status barriers), substantive representation of women of migrant backgrounds in democratic processes**, including at local and EU levels.
- **Ensure online and offline safety for women in public life** by adopting specific protections against incitement of violence motivated by particular characteristics, such as sex, sexual orientation, ethnic origins, and political opinion, in line with the Digital Service Act[57].
- **Promote women's equal participation in peacebuilding, crisis response, and migration governance**, in line with the Women, Peace and Security Agenda[58], UN Resolution 1325[59], and the Istanbul Convention[60]. In practical terms, this should include ensuring that the relevant provisions EU Migration Pact Acts, EU Integration Plan, and EU Gender Action Plan, are implemented, including involving migrant and refugee women in the design and implementation of national action plans.
- **Ensure that in all external actions** of the EU are aligned with international legal framework, in particular CEDAW Articles 7 and 8[61], and General recommendation N.40[62]. No policy, programme or funding on external territories of the EU should inadvertently weaken women's protection on the basis of sex, promotion of legalisation of pimping or exploitation of prostitution or reproductive exploitation of women. Equally, these should also ensure the protection of women's human rights defenders.

8. Institutional Mechanisms That Deliver on Women's Rights

Effective realisation of women's rights demands strong institutional infrastructure and sustainable financing. Without robust accountability mechanisms, these commitments risk remaining symbolic.

To ensure concrete impact, the EU should:

- **Initiate, if required through a trilateral process with EP and EU Council, the establishment of an EU Coordinator for Women's Rights and Women's Empowerment** (similar to the EU Anti Trafficking, Victims RIghts or Racial Equality coordinators).
- **Initiate and coordinate the EU civil society platform of women's rights and women's empowerment for an effective dialogue between the EU institutions and CSO and social partners in the area of equality between women and men.** Such a platform should not be limited to EU wide organisations but should be open for membership to national and local grassroots organisations with a mission of combatting sex-discrimination and promoting equality between women and men.
- **Ensure the good administration of EU bodies and agencies by mandating:** 1) sex-disaggregated data collection and reporting based on the sex observed at birth 2) using correct terminology in line with EU primary and secondary laws (e.g. not replacing sex with gender and not introducing terms such as "queer" or "+" that has not been defined in EU legislation) 3) implementing mainstreaming of equality between women and men across all policy areas and funding managed by EU institutions**.**
- **Implement an on-going training on sex-discrimination, principle of equality between women and men and its mainstreaming, and fundamental rights across EU institutional staff.**
- **Conduct at EU wide study to assess the situation across MS of women's rights organisations, women's spaces, entities and clubs on the basis of sex** in line with the EU Directive on equal access to goods and services, their access to resources, respect of their right of association and assembly, and their inclusion in institutional dialogue.

57 https://commission.europa.eu/publications/legal-documents-digital-services-act_en
58 Ibid (5)
59 https://www.un.org/womenwatch/osagi/wps/
60 Ibid (16)
61 Ibid (1)
62 https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-recommendation-no-40-equal-and-inclusive

- **Strengthen and adequately fund gender equality bodies at EU level and** ensure the institutional independence of equality watchdogs.
- **Ensure that Equality bodies do not inadvertently erase protections on the basis of sex for women and girls and do not conflate or substitute sex with gender, gender identity, gender expression or sex characteristics** in their monitoring and reporting of human rights violations**.**
- **Guarantee systematic mainstreaming of equal opportunities between women and men across all EU policy areas**, funding instruments, and EU budgets (including under the MFF), including migration, integration, health, labour, education, crime prevention and persecution, digital transition, and climate, and external actions with binding tools for budgeting purposes.
- **Ensure that in the next MFF there is a clear allocation of funds for sustainable, flexible and direct funding to grassroots women's rights', including migrant-women-led organisations,** under direct EU funding and as a prerequisite for MS funding in the areas of human rights, justice, equality, democracy and rule of law
- **Ensure that disaggregated data collection** (by sex, migration status, ethnicity, socio-economic status, disability, etc.) **is standard practice in the work of EU directorates, units and agencies,** as well as at MS level, while fully safeguarding privacy and data protection rights, in line with Regulation (EU) 2016/679 (GDPR)[63].

63 https://eur-lex.europa.eu/eli/reg/2016/679/oj/eng