



# REPLIES OF THE EUROPEAN COMMISSION AND OF THE EUROPEAN EXTERNAL ACTION SERVICE TO THE EUROPEAN COURT OF AUDITORS' SPECIAL REPORT

The Spotlight Initiative to end violence against  
women and girls:  
Ambitious but so far with limited impact

# Contents

I.	COMMISSION AND EEAS REPLIES IN BRIEF .....	2
II.	COMMISSION AND EEAS REPLIES TO MAIN OBSERVATIONS OF THE ECA.....	3
1.	Results and impact .....	3
2.	Origins and design of the Spotlight Initiative .....	4
3.	Management, performance, and value.....	6
4.	Sustainability and the way forward .....	9
III.	COMMISSION AND EEAS REPLIES TO THE RECOMMENDATIONS OF THE ECA.....	10
	Recommendation 1: Carry out a thorough comparison of alternative options and provide well-documented justifications for selection of countries and allocation of funds.....	10
	Recommendation 2: Incorporate lessons learned into future actions.....	11
	Recommendation 3: Increase the proportion of funding reaching final beneficiaries and include assessment of cost effectiveness in future actions.....	12
	Recommendation 4: Strengthen sustainability and knowledge building and sharing.....	13

This document presents the replies of the European Commission and the European External Action Service to observations of a Special Report of the European Court of Auditors, in line with Article 259 of the [Financial Regulation](#) and to be published together with the Special Report.

# I. COMMISSION AND EEAS REPLIES IN BRIEF

The Commission and the European External Action Service (EEAS) welcome this Special Report by the European Court of Auditors (ECA). As a core principle, the Spotlight Initiative continuously applies learning through formal and informal assessments, operations, and partner and beneficiary feedback. In this regard, the report's findings and recommendations are a valuable contribution.

The Spotlight Initiative has been an unprecedented investment (€497 million backed by the EU) in addressing violence against women and girls. It has had transformative results through a whole-of-society, multi-disciplinary and comprehensive approach aimed at leaving no one behind. A 2021 external study found the Initiative's comprehensive model to be up to 90 per cent more effective in preventing violence than other models.<sup>1</sup> The Initiative has had positive achievements and impact on beneficiaries, but more time and resources are required to fully yield its results.

The EU support to the operationalisation of the UN development system reform,<sup>2</sup> together with the convening power of the UN, ensured a comprehensive, whole-of-society approach. Concretely, this support and partnership has ensured greatest use of comparative advantage and targeted expertise, as well as encouraged deep government commitment to an under-prioritised issue. The EU/UN partnership combined with a comprehensive model addressing violence against women and girls strengthened civic space by placing civil society in positions of influence and as key partners of the Initiative. Siloed models that focus on one aspect only of the continuum of violence would not have had the same impacts.

In many countries, the Spotlight Initiative has created the conditions for a broad political debate on ending violence against women and girls, nudging authorities to consider policies and solutions that were not part of the public debate before the start of the Initiative. This was possible because of the EU/UN partnership, and particularly as a result of the convening power of the UN Resident Coordinators and EU Heads of Delegation. Political commitment by governments has translated into real action as well as sustainable domestic funding: since 2019 with the Initiative's support, national budgets to address gender-based violence increased ten-fold across 14 countries.<sup>3</sup> Such advancements now need to be consolidated through continuous political engagement and strategic, targeted investments to ensure sustainability, as these opportunities risk closing in the longer term.

The Commission and the EEAS are committed to capitalise on the knowledge and best practices generated by the Spotlight Initiative. Addressing gender-based violence is a long-term development challenge. The EU will continue to invest into building global and regional partnerships. It will continue to promote approaches that prevent gender-based violence including approaches which address the social norms and behaviours that underpin violence. In August 2022, the European Commission adopted a decision under the Global Challenges thematic programme (priority area: People) of the Neighbourhood, Development and International Cooperation Instrument – Global Europe (NDICI – Global Europe) for an amount of EUR 40 million to support the rolling out of best practices, knowledge, and expertise and to help civil society – in particular women's movements and coalitions – strengthen global advocacy on Ending Violence Against Women and Girls

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<sup>1</sup> [Imperative to Invest: How addressing violence against women and girls today reduces violence over time](#)

<sup>2</sup> In 2017, UN Secretary-General Guterres proposed a number of ambitious reform proposals to member states, to ensure that more coherent, accountable and effective support is provided to help countries achieve the 2030 Agenda. The reform was centred around three goals: 1) A reinvigorated Resident Coordinator (RC) system; 2) A new generation of UN country teams; 3) Improved funding practices by donors/Member States, with more predictable and flexible resources that incentivize integrated UN support to countries.

<sup>3</sup> Spotlight Initiative Annual Narrative Progress Report 2022, p. 10

(EVAWG).<sup>4</sup> This will complement further support to address gender-based violence at country level through the NDICI – Global Europe.

## II. COMMISSION AND EEAS REPLIES TO MAIN OBSERVATIONS OF THE ECA

### 1. Results and impact<sup>5</sup>

The Spotlight Initiative model has a comprehensive and global approach, and the choice of geographical areas and thematic approach takes account of the needs and of specific country contexts. The ECA's findings are aligned with the meta review of the Spotlight Initiative in Africa and Latin America and show that the Initiative produced results in all countries across pillars. The Commission and the EEAS consider that these observations corroborate the value of inclusive approaches adapted to country context as well as meaningful engagement with civil society organisations at country and regional level.

After almost five years of implementation, the model is proving successful as regards its core principles and key innovations in addressing violence against women and girls. Since the start of the Initiative, investments across more than 30 programmes ensured, for example, that:

- 174 laws or policies were signed or strengthened to end violence against women and girls.
- National budgets to address violence against women and girls increased eightfold across countries targeted by the Initiative.
- The overall annual conviction rate doubled across countries targeted by the Initiative.
- 260 million people were reached through campaigns to prevent violence against women and girls in at least 30 languages over the 26 Spotlight countries.
- Nearly 2.5 million women and girls have accessed gender-based violence services.
- Close to 3.5 million young people participated in in-and out-of-school programmes promoting gender-equitable attitudes and behaviours.
- Nearly 2 million men and boys have been educated on positive masculinity, respectful family relationships, and non-violent conflict resolution.
- More than 1750 civil society organisations received financial support through the Initiative.

Building on these achievements, the UN modelled the potential impact of its work in the above-mentioned external study (see footnote 1), which shows that it could result in 21 million fewer women and girls experiencing violence by 2025.

The Spotlight Initiative was also an investment by the EU in multilateralism to both support the achievement of Sustainable Development Goals (SDG), with gender-based violence identified as an entry point for SDG acceleration and to support the implementation of a new way of working under the UN development reforms. By investing in the UN Reforms, the EU is supporting greater effectiveness and sustained effort towards the achievements of the SDGs.

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<sup>4</sup> C(2022)6137 of 23.8.2022. See also ECA observation 104

<sup>5</sup> As defined in the EU Results Framework, SWD(2018) 444 final, p.10

By applying the main principles of the reform, namely anchorage of a 'One UN' on the ground through the leadership and coordination of the Resident Coordinator; leverage of the strength of the whole UN Country Team based on comparative advantages rather than mandate; as well as concerted programme design and implementation processes and harmonised practices (e.g., common procurement, common calls for proposals, etc.), the Commission considers that the Spotlight Initiative amplified effectiveness in delivery.

As such, the Spotlight Initiative goes beyond the requirements stipulated in the management and accountability framework issued by the UN Development Coordination Office. Therefore, and, as such, key elements such as harmonised practices (e.g., common procurement, common calls for proposals, etc.) were set up through the Initiative, as well as in parallel to it.<sup>6</sup> The EU's efforts to back UN reform through Spotlight have been consistently praised by the UN, EU Member States, and partner countries.

As concerns the **impact of interventions**, the Commission acknowledges that it is challenging to quantify it at this stage, as interventions are focused on issues deeply entrenched in societal systems and attitudes. The inconsistent availability of reliable data is a significant obstacle to measuring changes over time and understanding the impact of the Spotlight Initiative.<sup>7</sup> Violence against girls and women, remains under-reported or misreported, thus creating a data gap. In addition, demographic and health surveys (and other household surveys) often do not capture it. The Commission also highlights that the impact of interventions related to gender-based violence take considerable time to manifest in measurable ways. Short-term changes or outputs may not necessarily translate into long-term impact. Finally, the multifaceted nature of violence against girls and women, influenced by a myriad of social, cultural, economic, and political factors, makes isolating the effects of Spotlight Initiative complex.

Given these challenges, the approach for the final evaluation of the Spotlight initiative will use the Most Significant Change (MSC) methodology,<sup>8</sup> which is a qualitative and participatory method of evaluation that involves the collection of stories of significant change. This method allows capturing the nuanced and complex changes brought about by interventions that may not be easily quantifiable or attributable in traditional evaluation methods.

## 2. Origins and design of the Spotlight Initiative

In view of implementing the priority 'stopping violence against women and girls' of the EU Gender Action Plan 2016-2020, the **choice of the UN** as an implementing partner came about in a specific context that saw both multilateralism and women's rights under great stress.<sup>9</sup> At the time, the US Administration under President Trump cut funds for gender equality, namely Sexual Reproductive Health Rights. At the same time, the 'One UN' reform was kicked off, with the aim to strengthen multilateralism. Politically, there was a clear interest and rationale for the EU to team up with the UN, which gave rise to the Spotlight Initiative. As the Spotlight Initiative went hand in hand with the initiation of the UN reform, implementing the UN reform provided both an opportunity and a challenge (and there is undeniably still progress to be made, for which Spotlight Initiative is providing key lessons).<sup>10</sup>

The **choice of the UN** was preceded by a wider discussion within the Commission on how to maximise the impact of the EU budget on gender equality. First, an overall concept<sup>11</sup> was drafted.

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<sup>6</sup> See ECA observations 62-63

<sup>7</sup> See ECA observations 81-85

<sup>8</sup> See ECA recommendation 4(a)

<sup>9</sup> See ECA observations 28-29

<sup>10</sup> See ECA observations 61-64

<sup>11</sup> See ECA observation 31

In line with the Commission's strategy to re-centre on its core-tasks and policy priorities, indirect management with pillar-assessed entities is also an opportunity to significantly reduce the mobilisation of Commission resources towards the financial and operational management of actions to further focus these on the policy/strategic aspects of the cooperation. The Commission was thus able to set up and monitor the Spotlight Initiative with existing, and indeed limited, human resources. Formal assessments of the technical expertise of specific implementing agencies occurred at the subsequent stage of programme design, as these are contingent on a variety of elements, including regional focus, country selection, etc. The individual actions funded under the Spotlight Initiative all underwent the required scrutiny before being the subject of a Commission Implementing Decision. The choice of a UN inter-agency Trust Fund<sup>12</sup> with one contract covering all regions helped ensure coherence regarding the objectives of the actions.

As a result of its formal assessments, the Commission found that in certain partner countries and/or on in certain areas of cooperation, UN entities indisputably had a strong presence in terms of operational capacities, as well as solid knowledge of the operating environment (e.g., laws, policies, civil society, government), on which the EU can rely in order to maximise the impact of its actions. Finally, in making such choices, the Commission does not use 'benchmarks' or 'best practices' as suggested in the Special Report.<sup>13</sup> Such an approach would arguably be fraught with difficulties, as too many factors come into play. The references in this regard are therefore rather the principles of sound financial management under the responsibility of the authorising officer, as set out in more detail in section 3 below.

As regards the **financial allocation**,<sup>14</sup> the Commission and the EEAS always acknowledged that the actual needs worldwide were much higher than the available EU funds. Spread across the country, regional and grant-giving portfolio, as well as the timeframe of the funding window, the amount of EUR 497 million was intended as seed funding to allow for future investments.

As concerns the mutually agreed **country selection process**,<sup>15</sup> at the onset of the initiative, the Spotlight Initiative Governing Body and Operational Steering Committee recognised the importance of considering both primary (prevalence of violence and the gender inequality index) and secondary criteria (e.g., type of context, government commitment, civic space, absorption capacity).<sup>16</sup> In September 2017, the first Governing Body of the Initiative proposed to revisit the criteria to ensure that some countries in specific circumstances were not excluded (e.g., with no legal/political framework or stability) and that the 'leave no one behind' principle was applied. The Operational Steering Committee agreed on the primary and secondary criteria, as well as on their weighting, and on the need to ensure flexibility.

The Spotlight Initiative's main aim was to produce a model that could be tested across a range of country types. Analysis of secondary criteria that could demonstrate the Initiative's effectiveness across a range of contexts was therefore strategically applied for country selection by the decision-making bodies of the Initiative. This included taking into account the countries where socio-political conditions would allow for the Initiative's whole of society approach to be rolled out effectively. Certain countries were not selected despite high prevalence as they already received large amounts of funding from the EU or because they received a 'gender top up' in the mid-term review of the DCI 2014-2020 programming cycle.<sup>17</sup>

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<sup>12</sup> See ECA observations 27-29

<sup>13</sup> See ECA observation 29

<sup>14</sup> See ECA observations 16, 39-40

<sup>15</sup> See ECA observations 42-46

<sup>16</sup> See ECA observations 42-46

<sup>17</sup> See ECA observations 40-41

As for the country selection process, **country financial allocations** were proposed and approved based on an assessment of factors such as the country specific cost of delivering assistance, nature of the needs (technical assistance versus services driven), existence of other Ending Violence Against Women and Girls (EVAWG) interventions, institutional absorption capacity, government ownership, etc.

### 3. Management, performance, and value

The EU's choice of a UN inter-agency **Trust Fund** and one comprehensive contract covering programmes in all regions enabled greater programme coherence and managerial efficiency. Without this UN global mechanism, the EU would have had to negotiate, sign and monitor either 40 joint agency contracts between the EU and UN Agencies, Funds, and Programmes or 150 single-agency contracts, which would have dramatically increased transaction costs. Beyond higher transaction costs, this would have also increased the fragmentation of results and limited the transformational impact of the initiative.<sup>18</sup>

As regards the **cost structure**,<sup>19</sup> the Commission recalls that the Spotlight Initiative is multi-faceted in nature and not limited to providing grants to implementing partners. The funds that the ECA considers to be for implementing partners and final beneficiaries would be impossible to implement without any management and coordination structure behind. Implementing partners and final beneficiaries also benefit from various elements that as the ECA considers “programme management costs”, such as knowledge management (toolkits, knowledge products, discussions, networking), civil society support, etc.

Concerning the assessment of **value for money**,<sup>20</sup> the Commission clarifies that once an ex-ante pillar-assessment is finalised, the Commission is not expected to verify every action undertaken by the implementing entity, in this case the UN organisations. Such duplication of work and costs would be contrary to the principle of sound financial management and question the very “raison d'être” of indirect management: to delegate the management of an action to better placed entities that can demonstrate a level of protection of EU financial interests equivalent to that existing when the Commission implements the budget itself. The Commission's contractors or other EU bodies audit or verify the implementation of EU funds by implementing partners as appropriate. In addition, the Commission services ensured close follow up of the Spotlight Initiative, both at headquarters and in Delegations, through frequent meetings and other exchanges.

As regards costs, it is important to make a clear distinction between what the ECA identifies as '**programme management costs**' and 'indirect costs'.<sup>21</sup> 'Programme management costs' are direct eligible costs needed for the implementation of the Action.<sup>22</sup> Programme costs at the level of the country and regional programmes are capped at between 18 and 22%. These encompass tasks such as programme design, analysis, coordination and technical coherence and quality control of interventions, technical assistance and policy advisory functions, advocacy, knowledge management, and monitoring and reporting. Importantly, addressing gender-based violence requires multi-disciplinary expert human resources to drive results. By partnering with the UN, the EU was able to harness existing frameworks of intervention, networks, and expertise on ending violence against women and girls, rather than having to build up such systems itself.

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<sup>18</sup> See ECA observations 27-29

<sup>19</sup> See ECA observations 68-70

<sup>20</sup> See ECA observations 71-73

<sup>21</sup> See ECA observations 69-70

<sup>22</sup> Direct eligible costs must, among other criteria, be actually incurred by the organisation, necessary for carrying out the Action, directly attributable to it, arising as a direct consequence of its implementation and charged in proportion to the actual use.

The remuneration<sup>23</sup> – also referred to as **‘indirect costs’** in the context of the Financial and Administrative Framework Agreement between the United Nations and the European Union (UN FAFA) – aims at covering costs which support the implementation of the action but are not considered part of the activities that the EU finances as set out in the description of the action (e.g., corporate management, horizontal and support staff, office, equipment costs – except for project offices). In principle, these costs cannot be charged as direct costs or contain costs already attributed to other budget lines and they do need not to be supported by accounting documents. In line with Article 4.1 of the UN FAFA, UN organisations are entitled to a remuneration not exceeding 7%. The standard indirect costs rate was established as part of the overall cost recovery policy by the Executive Boards of UN entities, i.e., UN Member States including EU countries. It is a harmonised cost recovery policy across the UN System; the rate in all UN inter-agency Trust Fund-financed programmes is 7%. The Commission highlights that this is lower than in many other instances and with other donors, where 8% indirect costs or more is a standardised amount. Thus, the cost structure of the Spotlight Initiative is standard and compliant with the contract in place.

As regards monitoring, the Spotlight Initiative’s **monitoring system** does not link programme outputs and outcomes to information on actual spending.<sup>24</sup> According to the UN, the contractually agreed financial reporting in the form of an accounting budget via UNDG budget categories does not mandate a link between results and resources. Also, according to the UN, its agencies are fully aware of the costs of activities and components of activities, through continuous management of the annual workplan and budget monitoring. However, UN agencies are not required to report on the costs of individual activities, therefore, this is not captured at programme level, but only at agency level. The Commission has meanwhile specifically addressed this matter in the context of the final evaluation of the Spotlight Initiative, which has started in May 2023. The evaluation includes assessing the reliability and validity of the monitoring system for verifying results. The final evaluation is managed by the UN as a ‘system-wide evaluation’.

The Commission acknowledges that the **monitoring and reporting framework** allows limited assessment of performance at programme and geographical level.<sup>25</sup> This is due to a number of factors. First, as mentioned above, there remains a significant gap of comprehensive, reliable, comparable, and up-to-date data on gender-based violence. While countries are increasingly using similar definitions and approaches, gaps remain in the availability of data on some forms of violence, such as femicide. Moreover, available data can also be misleading. Increased awareness of the rights of women and girls and stronger trust in national institutions can lead to a short-term increase of violence, because of increased reporting. Given prevalence data limitations as well as evidence that reduction of prevalence takes time, experts usually also look at other trends (policies, laws, statements, press reports) to indicate progress.

Data collection and **reliability of data** under the Spotlight Initiative are indeed challenges that have been identified as such from the start. For that reason, the programme has a dedicated Outcome area (pillar 5) to improve data collection, analysis, and dissemination. As is widely known, data management for programmes related to gender-based violence is very sensitive and entails additional ethical considerations, which require specific methodologies and make data use and analysis more complex. More specifically on indicator data, Spotlight Initiative annual reports include an “Annex A companion” which flags data challenges and how the Spotlight Secretariat is addressing them. Throughout the Spotlight Initiative’s monitoring system, a series of quality assurance mechanisms have been put in place to guarantee the quality and reliability of data produced and reported.

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<sup>23</sup> See ECA observations 68-71

<sup>24</sup> See ECA observations 74-76

<sup>25</sup> See ECA observations 77-85



As a result of the Spotlight Initiative's work under pillar 5, 8 500 government officers from different sectors have been trained on analysis and use of prevalence and incidence data on Violence Against Women and Girls (VAWG). 16 countries that conducted prevalence studies or baseline studies in the context of the programme now have globally comparable data on VAWG. The Africa regional programme supported another 17 countries as they conducted prevalence surveys or other related studies on violence against women and girls to ensure that the data produced can be compared at regional and global levels. Overall, 36 national statistics offices have been supported to develop or adapt and contextualise methods and standards at national level to produce prevalence data on VAWG. These results are crucial to ensure that more robust data is available and that comparisons or aggregations can be done at regional and/or global level.

**Partnership with civil society** is a fundamental dimension of the Spotlight Initiative's structure and functioning.<sup>26</sup> The Initiative invests in civil society through a twin-track approach: directly through its Pillar 6, focused on supporting autonomous women's organisations; and through mainstreamed support across all other pillars of the programme, by partnering with civil society to deliver programming. In addition, the Initiative includes a grant-making mechanism through the UN Trust Fund to End Violence against Women and the Women's Peace and Humanitarian Fund.

The Commission acknowledges that the programme faced governance as well as external **challenges**, the most significant of which was possibly the COVID-19 pandemic.<sup>27</sup> This showed how the programme could respond rapidly and flexibly to a wholly unforeseeable external event. With the pandemic hitting the world in 2020, the European Commission, in partnership with the UN, had to prioritise and frontload activities from the Spotlight Initiative to prevent and respond to violence against women and girls in 24 (and eventually 26) countries. Within a short timeframe, €21 million were allocated to counter the increase of domestic violence under the COVID crisis, boosting prevention, supporting survivors, including Sexual and Reproductive Health and Rights (SRHR), and giving a lifeline to women's organisations and civil society organisations combatting gender-based violence.

Comprehensive efforts through the Spotlight Initiative have included:

- Using both new technologies and community networks to deliver prevention messages specific to mitigating violence at home (through social media campaigns, influential artists, bloggers, media, and youth, business and faith-based leaders).
- Rapidly scaling up remote service delivery and promoting service availability and accessibility through various mediums that are accessible to women and girls (shelters, hotlines, protective gear, transport and mobile phones, mobile courts).
- Integrating ending violence against women and girls measures into national and local COVID-19 response plans.
- Providing direct grants and technical support to civil society and women's organisations to allow them to continue critical work.

As innovative tools were developed to ensure access to services and protection, to women in the context of lock down worldwide, lessons learnt were drawn. As a result, at the end of May 2020, the EU published a joint statement by HRVP Borrell and Commissioners Urpilainen and Lenarcic on safeguarding women's rights during the pandemic.<sup>28</sup>

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<sup>26</sup> See ECA observations 53-56

<sup>27</sup> See ECA observations 65-66

<sup>28</sup> Women's rights around the world in times of the coronavirus pandemic: joint statement by the High Representative/Vice-President Josep Borrell and Commissioners Jutta Urpilainen and Janez Lenarcic

## 4. Sustainability and the way forward

Today, the Spotlight Initiative serves as a model of reference at a global level in multilateral forums, such as the Committee on the State of Women, G7 or Generation Equality Forum. The Spotlight Initiative also plays an important role in the implementation of the third EU Gender Action Plan.<sup>29</sup> prevention of gender-based violence is one of its six focus areas and the GAP III states that the Spotlight model is the reference model to be used for any EU intervention on ending gender-based violence.

After five years of implementation, the Initiative's sustainability is being ensured through a multi-track approach. **At multilateral level** the EU is leading the **Group of Friends to End violence against Women and Girls**. Created in December 2019 at the initiative of the EU Delegation to the UN, the aim of the Group of Friends is to encourage coordination within the UN on efforts to eliminate all forms of gender-based violence, making use of the results of the Spotlight Initiative, its promising approaches and lessons learnt.

The **Generation Equality Forum** (launched in 2021 by UN Women, France, and Mexico) is the world's leading initiative to accelerate investment in and implementation of gender equality measures. The European Commission is co-leader of the action coalition on gender-based violence. In this context, the Spotlight Initiative has served as model of reference, particularly on issues such as prevention and provision of services to victims.

At **programming level**, under NDICI - Global Europe, at the regional and global level, funding has been secured to allow to advance critical gender-based violence engagement and actions at global level to end gender-based violence.

At the bilateral level, Spotlight Initiative's achievements have generated strong interest from EU Delegations. Out of 83 multi-annual indicative programmes assessed, 41 include gender equality as a sector or sub-sector of intervention. Most actions targeting gender as a primary objective focus on the elimination of gender-based violence. To date 108 Country Level Implementation Plans, have 'Ensuring freedom from all forms of gender-based violence' as their number one priority. In this context, too, the Spotlight Initiative has been the model of reference.

The Commission acknowledges that the initial Spotlight model had certain drawbacks, including complex governance structures.<sup>30</sup> Based on a mid-term assessment conducted in all countries in 2021 and 2022 as well as a meta-analysis covering Latin America and Africa, the model is being simplified by focusing on four pillars (Institutional Strengthening, Prevention, Services and Civil Society) instead of six, with greater attention to country contexts, a reduced number of implementing UN agencies and lighter governance. The UN and the Commission are presently working together to design **a new model of collaboration** for the next phase with streamlined processes, more responsive technical assistance mechanisms, increased country ownership, including local management of country programmes, and focused on the added value that the Spotlight Initiative Secretariat can provide in terms of knowledge management, monitoring and evaluation, as well as fund management.

As the Spotlight Initiative enters a new phase, lessons learnt are being applied to retain the proof of concept from the initial phase, while adjusting to ensure **a leaner, more streamlined and context-specific way of working**. The "centre of gravity" of programme governance and decision making will be at country level. All key strategic, financial, and operational decisions will be taken

<sup>29</sup> Eu Gender Action Plan (Gap) III – An Ambitious Agenda For Gender Equality And Women's Empowerment In EU External Action (GAP III, JOIN(2020) 17 final)

<sup>30</sup> See ECA observations 88-104

by the National Steering Committees. EU Delegations are encouraged to follow a Team Europe approach and bring on board other country-based donors to continue strengthening the EU's commitment in the Spotlight Initiative and multilateralism. The global Spotlight Initiative Secretariat will focus on technical and quality support, monitoring and evaluation (M&E), knowledge management, strategic communications, resource mobilisation and growing partnerships, and on sustaining the global momentum created by the Initiative. As mentioned above, those elements will be funded by the Commission directly via a global project under NDICI Global Challenges (priority area: People).<sup>31</sup>

To share lessons learned and effectively promote new partnerships across social, economic, governmental, and institutional sectors, the Commission as co-lead of the Generation Equality Forum's Gender-Based Violence Action Coalition has committed to supporting a **Knowledge Global Platform**. Core to the Knowledge Global Platform is the concept of sustainability. The Global Platform will offer the combined flexibility of an online knowledge hub, a community of practice and an advocacy channel, founded in the practical experience of the Spotlight Initiative. It will operate through circular knowledge exchanges that value multi-stakeholder collaboration and ownership, regional and country-level expertise, and practice-based knowledge. Ultimately, the Global Knowledge Platform should act as a one stop shop, develop knowledge products and tools, inform global policy and advocacy on EVAWG, model programming and connect key stakeholders such as UN, EU, civil society, donors, private sector, practitioners, academia for increased impact to end gender-based violence.

Finally, the Commission and the UN have been active on the issue of resource mobilisation.<sup>32</sup> Efforts have been made to reach out to other partners. The Spotlight Initiative is intensifying its efforts to secure new funding for continuous and new programming, including securing human resources to strengthen resource mobilisation efforts, engagement with donor countries to socialise awareness of the Initiative and a planned replenishment conference. In May 2023, the UN selected the Spotlight Initiative as one of 12 High Impact Initiatives to be presented at the SDG Summit in September 2023 as a model cross-cutting effort to accelerate the full implementation of the SDGs.

### III. COMMISSION AND EEAS REPLIES TO THE RECOMMENDATIONS OF THE ECA

#### **Recommendation 1: Carry out a thorough comparison of alternative options and provide well-documented justifications for selection of countries and allocation of funds**

**When funding future global development initiatives, the Commission should:**

- a) prior to the Commission Decision, carry out a thorough comparison of the comparative advantages and disadvantages of alternative implementation options, including estimates of their costs;**

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<sup>31</sup> See ECA observation 102-103

<sup>32</sup> See ECA observation 100

**(Target implementation date: actions funded from January 2025)**

The Commission **accepts** this recommendation and considers that the procedures to evaluate the choice of implementing modality are already in place. The choice of implementation modalities is always evaluated during the design phase of any action and is reviewed by the relevant legal and budgetary services of the Commission prior to the adoption of any corresponding Financing Decision. Where indirect management with a pillar-assessed entity is selected, the choice of the implementing partner(s) needs to be justified and approved by the competent Director, before concluding the Contribution Agreement. This was also the case for the actions included in the Spotlight Initiative. Moreover, the initial orientations for the gender initiative and the partnership were discussed and validated by the Commission.<sup>33</sup>

**b) document the reasoning behind the regions and countries selected and the amounts allocated to them.**

**(Target implementation date: actions funded from January 2024)**

The Commission **accepts** this recommendation and considers it partially implemented. While considerable documentation is available on the selection and allocation processes, there is room for further improvement in documenting these.

## **Recommendation 2: Incorporate lessons learned into future actions**

**To improve the efficiency of future actions building on Spotlight Initiative, the Commission should:**

**a) ensure that, if the six-pillar approach (or a similar design) is applied, this allows sufficient flexibility to adapt the approach according to the specific country contexts, and ensure the effective involvement of civil society;**

**(Target implementation date: Actions funded from January 2024)**

The Commission **accepts** this recommendation. Addressing gender-based violence is a multi-faceted issue. It affects all people – particularly women and girls – in different ways and is highly context-specific. The Commission agrees that the next phase of the Spotlight Initiative needs to have more flexibility with four outcome areas (pillars) that can easily be contextualised: 1) laws, policies, and institutions (including data collection and analysis to support decision making); 2) prevention and social norms change; 3) response (services for survivors and accountability of perpetrators) as well as 4) support to and partnership with the women's movement. This streamlined theory of change provides a framework for stakeholders to select and adapt interventions to their context and the needs of women and girls in targeted areas, including those that are often left behind. This theory of change goes beyond a sole focus on gender-based violence: it integrates elements related to gender equality more generally, such as social norms change, political participation and women's economic empowerment. In the next phase of the Spotlight Initiative, programmes will have great flexibility to focus their results framework on key issues related to their local context and to the priorities of national stakeholders.

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<sup>33</sup> See ECA observation 28

- b) when concluding contracts with UN organisations, consider arrangements which simplify the implementation of programmes, including limiting the number of UN implementing organisations per programme.**

**(Target implementation date: Actions funded from January 2024)**

The Commission **accepts** this recommendation. The Spotlight Initiative was proposed by the EU as an instrument to purposefully support the UN reforms' implementation by promoting a new way of working amongst UN Agencies. The Spotlight Initiative was launched at the inception of the UN reform's roll out and, as a high-profile initiative, has played an important role modelling its implementation.

For future programmes, a simplified theory of change based on four pillars should engender more agile implementation, including a smaller number of implementing agencies and simplified coordination and governance mechanisms.

### **Recommendation 3: Increase the proportion of funding reaching final beneficiaries and include assessment of cost effectiveness in future actions**

**To take account of value for money considerations in future development actions, the Commission should:**

- a) increase the amount of funding reaching final beneficiaries by reducing indirect and programme management costs as a proportion of total activity costs; for example, it should negotiate a reduction in the percentage of indirect costs charged by the UN if selected as an implementing partner.**

**(Target implementation date: actions funded from January 2025)**

The Commission **partially accepts** this recommendation. The Commission agrees that it should aim at limiting programme management costs to what is necessary to ensure that the objectives of any action are attained. However, in the context of cooperation with UN organisations the remuneration ("indirect costs") is tightly governed by the UN FAFA. The limitations imposed in the agreement precisely aim at ensuring that this remuneration is commensurate with the conditions under which the actions, such as the Spotlight Initiative, are implemented, in line with Article 155.6 of the EU Financial Regulation.

- b) ensure that monitoring and evaluation of future development actions takes better account of cost effectiveness, for example, where relevant, by linking costs to achievements.**

**(Target implementation date: actions funded from January 2025)**

The Commission **accepts** this recommendation.

The Commission will assess cost-effectiveness through evaluation and monitoring activities whenever this is possible and economically viable. The Commission has also set up a corporate system able to systematically collect and report the achievement of outputs and outcomes for

external action. However, the Commission can only ensure linking costs to achievements in the context of results-based forms of funding such as financing not linked to costs.

## **Recommendation 4: Strengthen sustainability and knowledge building and sharing**

**In order to maximise the added value of the Spotlight Initiative, the Commission should:**

- a) ensure that the Spotlight Initiative's final evaluation assesses the outcomes and impact of each programme's activities, including the cumulative results of country programmes, consolidated results by region, and tracking of amounts allocated to fighting female genital mutilation and child marriage;**

**(Target implementation date: January 2024)**

The Commission **accepts** this recommendation. The Commission has discussed these issues with the UN System-wide Evaluation Office, responsible for conducting the Initiative's final evaluation, including in the first meeting of the Reference Group for the evaluation.

- b) ensure that sustainability and exit strategies are prepared for all Spotlight Initiative programmes, identifying specific actions to continue fighting violence against women and girls after the programmes end;**

**(Target implementation date: January 2024)**

The Commission **accepts** this recommendation. There has been a strong commitment across all Spotlight Initiative programmes to engage in multi-stakeholder discussions to strengthen sustainability efforts across the board. During 2023, most programmes have initiated the drafting of sustainability strategies to be concluded by end of the year. Building on achievements of the initiative, relevant EU Delegations are prioritising support to gender budgeting as well as continued support to Gender Ministries and mechanisms with a specific focus on gender-based violence to ensure sustainability at government level.

- c) ensure that the knowledge generated by Spotlight Initiative activities at global and programme level is adequately stored, maintained and made available to the Commission and other interested stakeholders in a well-organised, user-friendly and easily accessible format.**

**(Target implementation date: January 2024)**

The Commission **accepts** this recommendation. Ensuring thorough documentation, storage and dissemination of knowledge generated through the Spotlight Initiative is crucial. The Commission has committed additional funding to support further amplification of lessons and good practices from the Spotlight Initiative as well as to strengthen availability of user-friendly tools and packages through Spotlight Initiative's *Global Platform*. The Global Platform will be a critical initiative to ensure that remaining gaps are fully addressed.