

Advisory Committee on Equal Opportunities for Women and Men

Opinion on Intersectionality in Gender Equality Laws, Policies and Practices

The Opinion of the Advisory Committee does not necessarily reflect the positions of the Member States and does not bind the Member States

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1. Introduction

Objective

The importance of addressing intersectionality has become a common message in the EU and in national policy debates, yet practical application of the concept in legislative processes, policy-making and practice remains very limited.

The objective of this Opinion on Intersectionality in Gender Equality Laws, Policies and Practices is to explore ways to develop an intersectional approach to gender equality action and tackle intersectional discrimination (involving gender as one of the discriminated grounds). The agreed mandate for the Opinion identified the following three guiding questions¹: i) How can we **raise awareness** about an intersectional approach to policy-making and implementation, and about the existence and dynamics of intersectional discrimination? ii) How can we ensure that **gender equality policies lead to substantive equality for all**? iii) How can we promote the development and implementation of anti-discrimination **laws to address structural discrimination** and not only individual cases?

As such an intersectional approach is developed and implemented to a different extent by the EU Member States and the European Commission, this Opinion will provide promising examples and highlight areas for further development.

Definition

For the purposes of this Opinion, the Advisory Committee refers to EIGE's approach to intersectionality as "*acknowledging that experiences and positions in society are influenced by gender as well other social categories*"². It further presents that an intersectional analysis seeks to expose disadvantage, discrimination and oppression occurring as a consequence of the combination of identities and the intersection of gender with other social factors^{3 4}. Intersectional discrimination thus signifies a situation where several grounds of discrimination operate and interact with each other simultaneously in such a way that they are inseparable.⁵ For example, women with disabilities are more likely to experience gender-based violence than non-disabled women, due to stigma and discrimination based on both gender and disability⁶.

An intersectional approach aims at **substantive equality and justice at a systemic level**, going beyond individual discrimination, to addressing structural inequalities by questioning and changing legislative and policy frameworks in the longer term⁷. It should be noted that while they are related concepts, and often used interchangeably, (additive) multiple discrimination and intersectional discrimination are not the same. On the one hand, (additive) multiple discrimination can be understood

¹ The questions are inspired by ENAR's and ICJ's Symposium on Intersectionality in October 2018. Available at: <http://www.enar-eu.org/Symposium-Intersectionality-a-tool-for-equality-and-justice-in-Europe>.

² European Institute for Gender Equality (EIGE), *Intersecting inequalities Gender Equality Index*, Publications Office of the European Union, Luxembourg, 2019. Available at: <https://eige.europa.eu/publications/intersecting-inequalities-gender-equality-index>

³ Ibid

⁴ Spierings, N., *The inclusion of quantitative techniques and diversity in the mainstream of feminist research*, European Journal of Women's Studies, Vol. 19(3), 2012, pp. 331-347. Available at: <https://doi.org/10.1177/1350506812443621>

⁵ European Commission, Directorate-General for Employment, Social Affairs and Equality Opportunities Unit *Tackling Multiple Discrimination Practice, policies and laws*, 2007, citing Moon, Gay, *Multiple discrimination – problems compounded or solutions found?*, Justice Journal, 2006, pp. 86-102.

⁶ UNFPA, *Addressing Violence against Women and Girls in Sexual and Reproductive Services: a Review of Knowledge Assets*, New York, 2010.

⁷ European Network against Racism, *Symposium: Intersectionality: a tool for equality and justice in Europe*, 2018. Available at: <http://www.enar-eu.org/Symposium-Intersectionality-a-tool-for-equality-and-justice-in-Europe>; For a brief overview, see: http://www.enar-eu.org/IMG/pdf/2018_intersectionality_enar_briefing_for_online_final.pdf; Center for Intersectional available at: <https://www.intersectionaljustice.org/>

as an individual belonging to two different groups, both of which are affected by discriminatory practices⁸. Intersectional discrimination, on the other hand, is 'synergistic'⁹, involving "a combination of various discrimination which, together, produce something unique and distinct from any one form of discrimination standing alone"¹⁰.

Justification

The key justification for an intersectional perspective on gender equality is that it **exposes** the different types of discrimination and disadvantage that occur, **reflecting the reality of discrimination**, since discriminated groups are seldom homogeneous. Intersectional discrimination can create additional obstacles, for instance to enter and progress in the labour market, to access services and participate in decision-making. For example, women with disabilities, women of colour or from ethnic minorities, LGBTI women, migrant women, young and older women face multiple obstacles in accessing the labour market and progressing their career, which widens the gender pay gap.

Furthermore, developing gender equality policies with an intersectional approach is likely to **lead to more targeted and efficient measures**, taking into consideration the different situations and needs of marginalised disadvantaged groups in a holistic way.

*"There is no such thing as a single-issue struggle as we don't live single issue lives."
(Audre Lorde, feminist civil rights activist.)*

"Many women and girls experience vulnerability and marginalization owing to, inter alia, multiple and intersecting forms of discrimination throughout their life cycle." (Agreed conclusions of the 60th session of the Commission on the Status of Women, March 2016)

The lack of an intersectional approach, i.e. maintaining structural barriers, also comes at a huge economic cost to society. A study by the European Parliament¹¹ estimates that the quantifiable loss in economic terms, (i.e. in terms of GDP loss and loss in tax revenue) is as high as "€224–305 billion GDP and lost tax revenue of €88-110 billion in relation to ineffective national implementation of the Racial Equality and the Employment Equality Directives." These two Directives have further developed the ground of discrimination in relation to sex to include respectively racial or ethnic origin and religion or belief, disability, age or sexual orientation as regards employment and occupation.

2. Context

Raising awareness about an intersectional approach to policy-making and implementation, and about the existence and dynamics of intersectional discrimination.

The nature of discrimination and how we understand it is crucial for determining how to combat it. However, although it is important that policy makers / legislators are aware of the existence and dynamics of intersectional discrimination, robust ways of applying an intersectional approach must be developed.

At Member State level, identifying the population groups will require multidimensional and multisector data disaggregation and targeted analysis. Data and statistics for each of the sub-groups should be accompanied by analysis to understand root causes and the 'why' for the inequalities or discrimination observed. Only after assessing the full effects of intersectional discrimination can policies be tailored to

⁸ Dr Diamond Ashiagbor, ERA seminar, *Current reflections on EU Gender Equality Law*, 2013. Available at: http://www.era-comm.eu/oldoku/SNLLaw/11_Multiple_discrimination/2013_04_Ashiagbor_EN.pdf

⁹ Crenshaw, K., *Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory, and Antiracist Politics*, University of Chicago Legal Forum, 1989, p. 139.

¹⁰ Eaton, M., *Patently Confused, Complex Inequality and Canada v. Mossop*, Review of Constitutional Studies, No 203, 1994, p. 229.

¹¹ Van Ballegooij, W. and Jeffrey M., *Cost of Non-Europe Report*, European Added Value Unit, Brussels, 2018. Available at: [http://www.europarl.europa.eu/RegData/etudes/STUD/2018/615660/EPRS_STU\(2018\)615660_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2018/615660/EPRS_STU(2018)615660_EN.pdf)

meet the needs of the target population. Single level disaggregation analysis often fails to adequately reflect the characteristics of those who experience intersectional discrimination or disadvantage^{12 13}.

At the EU level, further developing existing indices for example the EIGE Gender Equality Index which already applies an intersectional analysis would support the awareness and understanding of intersectionality and support its dissemination.

Inclusive and accessible consultation, strengthening dialogue mechanisms and the voice of marginalised groups are also key components in improving the understanding of intersectionality. For example, the National LGBTI+ Inclusion Strategy adopted by the Irish Government in November 2019 was informed by an extensive public consultation. This included inviting written submissions, holding public meetings around Ireland and sessions with the volunteers of the LGBT Ireland helpline, service providers and board members. In addition, specific workshop sessions were organised for the Intersex Community, Travellers, Asylum Seekers, Migrants and Refugees and the Deaf Community to ensure that the voices of the more marginalised members of the LGBTI+ community were adequately heard. For awareness raising and dissemination, there are also opportunities for policy makers to build on the momentum of existing national and global movements and campaigns: for example, using the efforts to tackle discrimination, stereotypes and sexual exploitation of women and girls through campaigns such as HeForShe and the #MeToo movement.

Other alliances which could be explored for national governments and policy makers include civil society organisations and non-traditional partners in the worlds of sports, media, film, celebrities, entertainment and fashion to create awareness on the importance of addressing intersectional discrimination.

The 2017 Colloquium on Fundamental Rights on “Women’s rights in turbulent times” highlighted that intersectionality must play a bigger role in the movement for gender equality and women’s rights. It is not simply a question of solidarity; participants stressed that “*without an intersectional approach, gender equality cannot be achieved, and the women’s movement will lack credibility*”¹⁴. Simultaneously, to advance fundamental rights of all other groups, it is crucial to apply a gender perspective. Participants agreed that increased attention to the experiences of women in minority groups does not mean a diffusion of the focal point for action for the women’s movement, which remains discrimination based on gender.

Ensuring that gender equality policies lead to substantive equality for all.

As mentioned above, intersecting discrimination and inequalities must be made visible and well understood for policies and legislation to be developed, which address their inherent structural dimension. To facilitate this, data and research with an intersectional perspective should be strengthened.

Whereas many of the EU Member States lack experience with intersectional forms of discrimination in law, some Member States have experience in policy development dealing with intersectional equality as a part of the gender equality and LGBTI equality policy. For example, the Second National Strategy on Domestic, Sexual and Gender-based Violence (2016–2021) of the Irish Government contains actions in relation to vulnerable groups, including Travellers and Roma¹⁵. In addition, most Member States and the EU Commission have experience of mainstreaming gender equality and women’s rights.

Exploring ways to mainstream an intersectional approach when creating new laws or policies can be one way forward. For example, the Netherlands recently adopted a questionnaire into the integral assessment framework for policies and legislation that asks all policy makers at all levels at all

¹² UN Women, *Turning promises into action: Gender equality in the 2030 Agenda for Sustainable Development*, 2018. Available at: <https://www.unwomen.org/-/media/headquarters/attachments/sections/library/publications/2018/sdg-report-gender-equality-in-the-2030-agenda-for-sustainable-development-2018-en.pdf?la=en&vs=4332>

¹³ UN Women, *Progress on the Sustainable Development Goals: The gender snapshot 2019*, 2019. Available at: <https://www.unwomen.org/-/media/headquarters/attachments/sections/library/publications/2019/progress-on-the-sdgs-the-gender-snapshot-2019-two-page-spreads-en.pdf?la=en&vs=5814>

¹⁴ *Conclusions of the 2017 Annual Colloquium on Fundamental Rights*, 2017, Available at: https://ec.europa.eu/justice/saynostopvaw/downloads/conclusions_colloquium2017.pdf

¹⁵ The National Office for the Prevention of Domestic, Sexual and Gender-based Violence, *Second National Strategy on Domestic Sexual and Gender-based Violence 2016-2021*, 2016. Available at: <http://www.cosc.ie/en/COSC/Second%20National%20Strategy.pdf/Files/Second%20National%20Strategy.pdf>

departments to consider the effects on gender equality of each new policy. Intersectional forms of discrimination could be a part of such assessment frameworks, where it is not yet implicit.

Further opportunities arise with the UN global goals for sustainable development, the Agenda 2030. As EU Member States are implementing and reporting on the commitment, interlinkages with the Sustainable Development Goal (SDG) could be made, in particular with number 5: *achieve gender equality and empower all women and girls*. One of the targets is end all forms of discrimination against all women and girls everywhere, which would then allow to reach other goals such as for instance Goal number 4 on quality education, Goal number 3 on Health and many others. In addition, attaining SDG 5 requires mainstreaming gender in the implementation of all the other SDGs, providing a further opportunity to develop and intersectional approach. It is important that governments implement policies that embody this “leave no one behind” principle, consistent with better targeting which is possible through an intersectional approach.

In this respect, the Irish National Strategy for Women and Girls adopted in 2017 states that it is *“underpinned by the societal values of equality, non-discrimination, inclusiveness, generosity, intersectionality, diversity and respect for human rights”*. The Strategy highlights goals under the SDGs, which are particularly relevant to women's empowerment in Ireland and the outcomes being pursued include *“the gender-sensitive implementation of the 2030 Sustainable Development Agenda is promoted in Ireland's international relations”*¹⁶.

Promoting the development and implementation of anti-discrimination laws to address structural discrimination beyond individual cases.

Legal systems and legally defined grounds for discrimination vary among EU Member States. Discrimination is embedded inter alia in institutional structures, group interactions and cultural stereotypes.

Discrimination exists in all Member States and, even where progress has been made combatting discrimination, it has instead changed from being open and direct (deliberate) to being indirect, subtle. It is often reproduced in routine daily organizational actions and situations such as recruitment practices, insecure employment conditions, temporary employment, part-time employment, dismissal, inadequate rehabilitation or accessibility, remuneration, discrimination of parents on leave, sexual harassment, mobbing, etc., often impacting already vulnerable or marginalised groups.

Very few EU Member States and candidate countries explicitly mention multiple discrimination or ‘intersectional discrimination’ in their legislation, and there is very little case law. As the knowledge of the nature of discrimination has increased, so has the knowledge of the limits of anti-discrimination law, which has started to look for different ways of combating discrimination, such as positive actions / active measures and/or trying to combine different discrimination grounds whenever possible.

In the case of Sweden for example, the aims of the Swedish Equality Ombudsman regarding discrimination on more than one ground was pointed out already in the preparatory works of the Swedish Discrimination Act. The Government Bill states that the Ombudsman could facilitate the possibility to act against discriminatory treatment, especially if the discriminatory treatment can be attributed to more than one ground of discrimination¹⁷. Hence, there seems to be no legal obstacles preventing The Ombudsman from continuing the ongoing efforts to promote the development and implementation of anti-discrimination laws to address discrimination on a societal and organisational level.

In Ireland, multiple and intersectional discrimination regularly arise in the case law of the Workplace Relations Commission (and formerly the Equality Tribunal) taken under the Employment Equality Acts and the Equal Status Acts, which allow complaints to be referred on any combination of discriminatory grounds under the Acts. Decisions are published and reported widely in the media. Lindberg v. Press

¹⁶ Irish Government, National Strategy for Women and Girls 2017-2020, Department of Justice and Equality, 2017. Available at: www.genderequality.ie/en/GE/NationalStrategyWomenAndGirls2017-2020.pdf/Files/NationalStrategyWomenAndGirls2017-2020.pdf

¹⁷ Swedish Government Bill 2007/08:95 p. 364.

Photographers Association of Ireland, DEC-S2011-041, is an example of a complaint of intersectional discrimination which was upheld¹⁸.

Intersectionality has also been recognised in commitments enacted at the international level. Current academic research¹⁹ suggests that references to particular grounds for discrimination need not be understood as delineating a group with fixed boundaries but could be understood in a relational way, as a way of describing different power relationships. Rather than constructing further sub-groups, existing grounds could therefore be understood as encompassing power relationships, which compound disadvantage. In other words, discrimination on grounds of gender can refer to all the relationships of power and disadvantage experienced by women, including women with disabilities, older women, women of colour or belonging to ethnic minorities, lesbian women, migrant women or any combination of these characteristics. Such an approach can be found in international human rights law, for example in the Convention on the Elimination of Discrimination against Women (CEDAW) and the Convention on the Rights of People with Disabilities (CRPD). The CEDAW Convention (Convention on the Elimination of all forms of Discrimination Against Women, 1979) explicitly refers to power relations, stating that “*the eradication of apartheid, all forms of racism, racial discrimination, colonialism, neo-colonialism, aggression, foreign occupation and domination and interference in the internal affairs of States is essential to the full enjoyment of the rights of men and women*”.

Courts would need to be more open to recognise and articulate the ways in which relationships of power interact, so that the most disadvantaged are protected. However, because of its cost and the length of time it requires, litigation is seen as a less effective way of addressing intersectionality than proactive measures.

Regarding EU law, research indicates that it is possible to incorporate an intersectional perspective into EU law but that harmonizing both the scope and reach of directives would facilitate this. For example, with the recast Directive (2006/54/EC)²⁰, there are provisions that could be more strictly applied, in particular article 3, – Positive action. This article allows for measures with a view to ensuring full equality in practice. Positive action could be implemented and evaluated from an intersectional perspective by the Commission as part of its monitoring role of the implementation of the Directive. Additionally, article 17 – Defence of rights paragraph 2, allows “*associations, organisations or other legal entities [...] [to] engage, either on behalf or in support of the complainant*”, i.e. litigation cases that could be brought on behalf of discriminated groups of women (and men) on the basis of intersectionality. In this context, it is worth noting the case action of the University Women of Europe (UWE - member of the EWL) under the collective complaints’ mechanism²¹ of the Social Charter of the Council of Europe on equal pay, which is currently being examined.

Examples from Member States indicate that active measures can be a way forward. The Swedish Discrimination Act²² entails provisions regulating active measures. In the Swedish Discrimination Act, active measures are defined as prevention and promotion measures aimed at preventing discrimination and serving in other ways to promote equal rights and opportunities in working life. These provisions are not applicable in individual cases. Employers and education providers are required to take active measures to prevent discrimination on all grounds covered by the Discrimination Act: gender, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation and age. The provisions on active measures entail the obligation to continuously apply a four-step approach of investigating risks and obstacles; analysing causes; taking measures; and monitoring and evaluation in the following five areas: i) working conditions; ii) provisions and practices regarding pay and other terms of employment; iii) recruitment and promotion; iv) education and training, and other skills

¹⁸ Fennelly, D., *Selected Issues in Irish Equality Case Law 2008-2011*, Equality Authority, Dublin, 2012. Available at: https://ihrec.ie/download/pdf/selected_issues_in_irish_equality_case_law_20082011ea_123_doc_final.pdf

¹⁹ Fredman, S., *Intersectional Discrimination in EU Gender Equality and Non-discrimination Law*, Report for European Network of Legal Experts in Gender Equality and Non-discrimination, European Commission, Brussels, 2006.

²⁰ Directive 2006/54/EC - equal treatment of men and women in matters of employment and occupation (recast);

²¹ Council of Europe, *The collective Complaints Procedure*. Available at: <https://www.coe.int/en/web/european-social-charter/collective-complaints-procedure1>

²² The Swedish Discrimination Act (2008:567) Chapter 3 entails these provisions.

development; and v) possibilities to reconcile gainful employment and parenthood. The Equality Ombudsman²³ (DO) has ongoing and planned projects regarding development and distribution of knowledge on active measures to identified key-actors in work-life. The Ombudsman also legally supervises the compliance of the provisions regarding active measures in the Swedish Discrimination Act²⁴. Examples and experience from the work include: 1) Collaboration with key actors, authorities and civil society to develop and distribute knowledge about discrimination. 2) Development and distribution of knowledge. 3) Communication efforts to increase the general awareness regarding the content and the application of the legislation. The Ombudsman has conducted several campaigns and developed and enabled digital educational tools for employers and unions on active measures. 4) The Ombudsman supervises the compliance of the Discrimination Act in different parts of society, i.e. work life and education.

At an international level, the recently adopted Council of Europe Committee of Ministers' Recommendation, Rec (2019)1 on Preventing and Combating Sexism²⁵ provides an example of applying an intersectional approach. The Recommendation states that differences between women, situational vulnerabilities and aggravating circumstances need to be taken into account when devising and reviewing legislation and policies to combat sexism. It also calls for the implementation of projects addressing the multiple and intersecting discrimination and of incentives for the media to promote positive images of women of ethnic minority and or migrant background.

3. Recommendations

Intersecting forms of discrimination must be made visible and well understood for policies and legislation to be more targeted and effective. Therefore, to develop an intersectional approach to gender equality and address intersectional discrimination, the Advisory Committee foresees the following actions necessary to be taken.

*The Advisory Committee recommends **Member States** to:*

1. Raise awareness within government, including equality bodies, on the definition of intersectional discrimination and disadvantage as well as the benefits of an intersectional approach when addressing gender inequality, stigma, stereotyping, prejudice, discrimination and violence. For example, promote the sharing of promising examples among Member States, encouraging cross-sector and cross-issue collaborations.
2. Engage and use opportunities presented by social media, major news networks, print media, entertainment platforms and regional and national events to raise awareness on the importance of an intersectional analysis of gender equality laws, policies and practices as well as the impacts of intersectional discrimination and disadvantage.
3. Create low-threshold ways to share best practices within the national context when it comes to intersectional forms of discrimination. Case law should be easily available for reference as this can serve as a basis for mutual learning.
4. Ensure meaningful consultation and dialogue with civil society organisations. Consultation processes should be targeted and accessible to marginalized groups and civil society organisations that represent such groups.
5. Improve availability of data, including support for the design of statistical strategies (including multidimensional and multi-disaggregated approaches to data analysis) and targeted data collection instruments. The latter would adequately capture the realities of disadvantaged groups and the intersection of different grounds of discrimination, including hidden or hard-to-reach groups—while ensuring ethical standards. This will make it possible to inform and develop policies and programmes that respond to these realities.

²³ The Equality Ombudsman (DO) is a government agency that works on behalf of the Swedish parliament and government to promote equal rights and opportunities and to combat discrimination.

²⁴ Information regarding the Equality Ombudsman and the Swedish Discrimination Act can be found on the webpage of the Equality Ombudsman: <https://www.do.se/other-languages/english/discrimination-act/#3>

²⁵ Recommendation CM/Rec(2019)1 adopted by the Committee of Ministers of the Council of Europe on 27 March 2019.

6. Train researchers, policy-makers and equality bodies on data collection and compilation of administrative data and to translate an intersectional analysis into practical frameworks. EU funds to be made available to support this as necessary.
7. Incorporate an intersectional perspective when mainstreaming gender equality in all policies and programmes from the design, to the implementation, monitoring and evaluation processes.

*The Advisory Committee recommends the **European Commission** to:*

1. Invest in and support the technical capacity of EU Member States' national statistical bodies. Access to new techniques and methodologies is essential for expanding the capacity of Member States to produce disaggregated statistics. Modernizing and integrating existing data platforms allows for better use of existing data sources and greater capacity to use data to inform a more holistic approach to tackling intersectional discrimination and disadvantage.
2. Carry out an inventory of research and fund research from an intersectional perspective (EU and CoE funding).
3. Disseminate research, policy initiatives and best practices as well as tracking progress. Doing so on a regular basis and disseminating these findings widely is essential for ensuring these data and findings are used by advocates and policymakers to inform political discourse and bring about necessary change.
4. Set targets to monitor and evaluate progress towards substantive equality for all. For example, support and further develop the intersectional analysis of EIGE Gender Equality Index, which includes an intersectional analysis.
5. Develop guidelines including good practices on the adoption of an intersectional approach in policy-making.
6. Systematically document and share experiences of Member States' national law reform processes in relation to intersectional discrimination. The documentation can be used to develop empirical evidence of progress, gaps and the transformational impact of reforms.
7. Disseminate information and strengthen accountability of discriminatory laws. Information on opportunities for strategic litigation; relevant reports and communications to the Universal Periodic Review, CEDAW Committee and other human rights treaty bodies; the country visits, reports and communications of the Working Group on the issue of discrimination against women in law and in practice.
8. Leverage the commitment and work in relation to Agenda 2030 and "leaving no one behind" and the efforts of implementing and monitoring this agenda at national and global level.
9. Promote the adoption of the proposal for the "Horizontal Directive" or Anti-discrimination Directive of 2008: on implementing the principle of equal treatment between persons irrespective of religion or belief, disability, age or sexual orientation, which moreover could include a gender mainstreaming perspective.
10. Include an intersectional gender dimension in other strategies, such as the Roma Strategy, the Disability Strategy and the Youth Guarantee.
11. Explore the option of an intersectional approach to the gender pay gap and carry out ongoing evaluation and reporting on the implementation of existing Directives in the area of discrimination in work.
12. Propose mandatory training on gender equality, intersectionality and gender mainstreaming for the new European Commission, to be established at the beginning of the mandate, to ensure that the intersectional gender perspective is included at the onset of policy-making, programmes, monitoring and evaluation.
13. Provide training for the new European Parliament, as a follow-up to the Rules of Procedure adopted in March 2019
14. Incorporate an intersectional approach in the development of a European Commission Gender Equality Strategy and develop concrete actions to address groups that are at risk of discrimination.