The Spotlight Initiative to end violence against women and girls

Ambitious but so far with limited impact
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Timeline

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Executive summary

I Violence against women and girls is one of the most systematic and widespread human rights violations. In 2017, the European Union (EU) launched the Spotlight Initiative in global strategic partnership with the United Nations (UN). The initiative’s main objective is to ensure that all women and girls, especially those who are marginalised and vulnerable, live free from violence and harmful practices. The Spotlight Initiative is financed by the EU with a contribution of €497 million, of which €465 million is managed by the UN on four continents and in more than 26 countries.

II Our objective was to determine whether the Spotlight Initiative has been an efficient and effective way for the Commission to address violence against women and girls. To answer this question, we looked into the design, implementation, monitoring and results of the initiative.

III Overall, we conclude that the Spotlight Initiative was an ambitious attempt for the Commission to address violence against women and girls, but its impact as of yet is limited. The four-year duration of the programme is not sufficient to create lasting change worldwide on a complex issue, which requires long-term actions, and additional resources. While the initiative has achieved outputs and has benefited women and girls, it is difficult to assess to which extent it achieved its intended results. We also identified room for greater efficiency and better value for money.

IV The Commission’s choice of the implementing partner, the UN, was a political decision aiming to support multilateralism. When selecting the implementing partner, the Commission did not make a thorough comparison of alternative set-ups for implementation and their related costs. We found that actions planned under the Spotlight Initiative reflected needs and its objectives are relevant for addressing violence against women and girls. However, we also identified shortcomings in the justification of funding decisions and in the selection of countries.

V We found that the implementation faced delays and challenges due to external and governance and operational constraints. There were good examples of cooperation between the main stakeholders but implementing a harmonised approach in countries with varying contexts proved difficult, and the high number of implementing UN organisations added complexity to the governance.
VI The Spotlight Initiative lacks an adequate assessment of value for money. The Commission was aware that selecting the UN implied higher costs, but it did not attempt to negotiate lower indirect costs than the maximum set in the framework agreement. The Commission’s assessment of activity costs was also limited, even though these are the only part of the Spotlight Initiative budget not predetermined contractually.

VII The monitoring and reporting arrangements of the Spotlight Initiative do not allow a sound assessment of the programmes’ performance. We noted lack of reliable baselines, as well as unsuitable targets and limited cumulative follow-up at programme level. The monitoring also does not link programme outputs and outcomes to financial result indicators, which limits the evaluation significantly.

VIII We focused on African and Latin American countries and found that the Spotlight Initiative programmes have delivered positive achievements in all and generated a wealth of information. However, although the aim was to make the activities sustainable, no new donors have been found, which poses a risk to the sustainability of activities. The visibility of the EU’s commitment and funding has also not always been ensured.

IX As regards knowledge sharing, actions are required to store information in an easily accessible way. However, we found that it is currently scattered and not easily accessible to interested users.

X On the basis of these conclusions, we recommend that the Commission:

- For future global development initiatives, carry out thorough analysis of implementing options and fully document the justifications for the selected regions and countries and their funding allocations;
- Incorporate lessons learned into future actions building on the Spotlight Initiative;
- For future development actions, increase the proportion of funding reaching the final beneficiaries and assess cost effectiveness;
- Strengthen sustainability and knowledge building and sharing for the remainder of the Spotlight Initiative.
Introduction

The Spotlight Initiative

01 The Spotlight Initiative is a global strategic partnership between the European Union (EU) and the United Nations (UN). Its main objective is to ensure that all women, especially those who are marginalised and vulnerable, live free from violence and harmful practices.¹

02 The initiative was launched in December 2017, with a press release announcing the EU commitment of approximately €500 million² (see paragraphs 16-18). Its implementation will continue until December 2023 at country and regional level and until December 2024 at global level. Contract closure is scheduled for December 2025, after delivery of the final report on the implementation of the initiative and completion of evaluations. The scope of the final report and evaluations were not defined at the time of the audit.

The global and EU policy framework

03 Figure 1 shows the global and EU policy framework on fighting violence against women and girls (VAWG). Gender equality is a universally recognised human right and a core EU value, with the Spotlight Initiative playing an important role in the achievement of both Sustainable Development Goals 5 and 16 as well as the EU Gender Action Plan 2021-2025.

¹ Questions and Answers: EU-UN Spotlight Initiative to end violence against women and girls, Commission fact sheet, September 2019, p. 1.
² EU invests EUR 500 million in new “Spotlight Initiative” to end violence against women, EEAS, 2017.
Violence against women and girls

The UN defines violence against women as any act of gender-based violence that results in, or is likely to result in, physical, sexual, or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life\(^3\) (Figure 2). It also includes harmful practices such as female genital mutilation (FGM) and child, early and forced marriage.

\(^3\) Article 1 of the Declaration on the Elimination of Violence against Women proclaimed by the UN General Assembly resolution 48/104 of 20 December 1993.
Figure 2 – Prevalence of violence against women

It is estimated that one in three women have been subject to physical and/or sexual violence at least once in their lifetime since the age of 15


05 Domestic violence, including intimate partner violence, remains the most prevalent form of VAWG. Similarly, the vast majority of cases of femicide, also defined as “gender-related killings of women and girls”, are perpetrated within the family. In 2019, about 50 000 women globally were victims of gender-related killings4. Recent studies show that the COVID-19 pandemic, which locked down women with their abusers, has intensified VAWG worldwide5.

06 Harmful practices against women and girls are also widespread globally. The exact number of girls and women worldwide who have undergone FGM remains unknown, but it is estimated at least 200 million6. Annually, over four million girls are at risk of FGM.

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4 Global Study on Homicide – Gender-related killing of women and girls, UNODC, 2019.
6 Female Genital Mutilation/Cutting – A global concern, UNICEF, 2016.
The number of child marriages is very high (Figure 3). In the least developed countries, that number doubles – 40% of girls are married before the age of 18, and 12% of girls are married before the age of 15.\(^7\)

**Figure 3 – Prevalence of early marriage**

![Image of a couple holding hands with text: Despite laws against early marriage, globally one in every five girls is married, or in union, before reaching the age of 18.](Image)


The Spotlight Initiative’s intervention logic

Ending VAWG is a long-term endeavour, which requires changes in societal norms and values as well as political commitment. The Spotlight Initiative’s aim is to eliminate all forms of VAWG in partner countries, and it has identified specific types of violence that are prevalent in certain regions. The initiative focuses its actions on five geographical regions and the types of violence prevalent in each (Figure 4).

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The Spotlight Initiative focuses its actions on the following geographical regions with specific focus on their prevalent types of violence:

**AFRICA**
- Sexual and gender-based violence, with a focus on harmful practices and sexual and reproductive health and rights

**ASIA**
- Traffic in human beings, sexual and gender-based violence and child marriage

**PACIFIC**
- Domestic violence and intimate partner violence

**CARIBBEAN**
- Domestic and family violence

**LATIN AMERICA**
- Femicide

**Source:** ECA based on Spotlight Initiative pillar-assessed grant or delegation agreement, Annex I, “Description of the action”, p. 35.

09 The Spotlight Initiative is based on a Theory of Change, a methodology which maps the assumptions, which inform planned interventions. It aims to tackle VAWG at multiple levels and through actions that reinforce each other. These activities are structured around six pillars (**Figure 5**).
The Spotlight Initiative’s approach is complemented by the “leaving no one behind” principle. This means measures should consistently focus on marginalised populations such as women and girls with disabilities, indigenous people, migrants, the elderly, ethnic minorities, those living in poverty, or any group facing multiple and intersecting forms of discrimination.

In each of the five geographical regions covered, the Spotlight Initiative supports a number of country programmes, which each cover the six pillars, and a regional programme, which focuses on fewer pillars in several countries (Figure 6). The regional programmes, which complement the country programmes, are aimed at strengthening policies and practices, sharing knowledge, and creating networks at regional level. In Southeast Asia, there is also a thematic regional programme entitled ‘Safe and Fair’, focusing on rights and opportunities for women migrant workers.

Source: ECA based on Spotlight Initiative global annual narrative progress report 2021.
In addition to country and regional programmes, Spotlight Initiative funding is channelled through the UN Trust Fund to End Violence Against Women and Girls and the UN Women’s Peace and Humanitarian Fund, which both give grants to civil society organisations (CSOs) in 30 countries (see paragraphs 18 and 34).

Figure 6 – Spotlight Initiative intervention areas

Note: (*) The two regions covered by our audit (see paragraph 21).

Source: ECA based on Spotlight Initiative global annual narrative progress report 2021.

Governance structure

The EU and the UN are equal partners in the Spotlight Initiative’s governance (see paragraph 49). The Spotlight Initiative was launched, as a visible high-level political initiative, by the EU Commissioner for Development and the UN Deputy Secretary-General, to eliminate and prevent violence against women and girls and to highlight cooperation and support between the EU and the UN. The EU’s High Representative for Foreign Affairs and Security Policy and Vice-President of the European Commission has also been involved since the start of the initiative.

The initiative’s governance and organisational structure consist of a global level and a regional/country level. The global level includes the governing body, the operational steering committee (OSC), the Administrative Agent and the Spotlight
Initiative Secretariat. The Commission’s role, in the governing body, is to provide, together with UN, strategic direction, advocacy and oversight of the initiative. In the OSC, the Commission’s and UN’s role is to ensure effective management and coordinate all operational and technical aspects of the initiative. At local level, programmes are governed by national/regional steering committees. The EU delegations’ representatives in these committees contribute to guiding and overseeing the implementation of the programme (Annex I).

15 The core UN implementing organisations are the UN Entity for Gender Equality and the Empowerment of Women (UN Women), the UN Population Fund (UNFPA) and the UN Development Programme (UNDP).

Spotlight Initiative allocation of funds

16 The Spotlight Initiative is financed by the EU with a contribution of €497 million, of which €465 million is managed by the UN. The other €32 million is managed by the EU through a call for proposals dedicated to CSOs. Other donors have committed only symbolic amounts, although the original plan was that EU contribution would serve as seed funding and attract additional funding from other donors (see paragraph 100). The EU contribution comes from the European Development Fund, the Development Cooperation Instrument and, for the call for proposals, from the Global Public Goods and Challenges programme (Figure 7).

Figure 7 – EU support for the Spotlight Initiative

Source: ECA based on Commission data.
The Spotlight Initiative is administered by the UN Multi-Partner Trust Fund Office (MPTFO), which acts as the Spotlight Initiative’s trustee and whose official reporting currency is US dollars (USD). The MPTFO reports on Spotlight Initiative funds managed by the UN.

The maximum EU contribution of €465 million (commitments), to be managed by the UN, was estimated at the time of the latest contract amendment in 2021 as approximately USD 548 million. As of 30 June 2022, the MPTFO reported actual EU commitments of USD 534 million, budget expenditure of USD 506 million, and the allocation of USD 480 million to programmes in five geographical regions. This included USD 33 million channelled through the UN Trust Fund to End Violence Against Women and Girls and the UN Women’s Peace and Humanitarian Fund. In addition, USD 26 million was allocated to cover the expenditure of the Spotlight Initiative Secretariat and the Administrative Agent, including the Global Knowledge Platform (Figure 8). UN organisations made contributions to the Spotlight Initiative totalling USD 38 million outside the UN Multi-Partner Trust Fund.

Figure 8 – Spotlight Initiative budget and actual expenditure as of 30 June 2022 (EU funds)

Note: (*) Including the Global Knowledge Platform.

Source: ECA based on UN data.
Audit scope and approach

19 Our audit examined the Commission’s management of the Spotlight Initiative, with the aim of assessing whether the funds were used efficiently and effectively and making recommendations to improve future EU action to combat sexual and gender-based violence (SGBV). With the Spotlight Initiative, the EU invested an unprecedented amount of money to address violence against women and girls. As the initiative is now approaching the end of its implementation period, our audit also aimed to assess the lessons learned and the sustainability of the actions funded. Our audit scope did not include Spotlight Initiative funds managed by the EU through a call for proposals specifically for CSOs.

20 Our main audit question was whether the Spotlight Initiative is an efficient and effective way for the Commission to address violence against women and girls. To answer this main audit question, we asked whether the Spotlight Initiative:

(1) Was designed well?

(2) Is being implemented efficiently and assessed adequately?

(3) Is making an effective contribution to ending violence against women and girls?

21 Geographically, we focused on Africa and Latin America, where the 13 country programmes and the 2 regional programmes (see Figure 6) had the highest actual expenditure, as a proportion of their respective budgets, at the time we were planning our audit. This allowed us to examine projects at a more complete stage of implementation. These two geographical areas are financially material: Africa’s total allocation is €250 million and Latin America’s is €50 million, meaning that together they account for a majority (64 %) of the Spotlight Initiative’s total budget (Figure 8).

22 The audit covered the period from the start of the initiative in 2017 up until November 2022, including the latest official data available as of 30 June 2022.
We analysed documents provided to us by the Commission’s Directorate-General for International Partnerships (DG INTPA) and the UN relating to the design, implementation and monitoring of the Spotlight Initiative. We carried out on-the-spot visits to Liberia and Mexico and video interviews with auditees in Uganda, as our physical audit visit had to be cancelled due to an Ebola outbreak (see Annex II on the activities sampled during the audit). We selected these countries to cover both Latin America and Africa with on-the-spot visits. We also took into account the results of the mid-term assessments (see paragraph 60), and included in our sample a country that had been assessed as well-performing, a country with room for improvement and a country that had faced difficulties.

For the other African and Latin American programmes, we conducted a desk review and collected information from EU delegations and UN Spotlight Initiative teams through either video interviews or written replies. We also held several interviews with DG INTPA and UN staff, and sent an audit survey to the 26 EU delegations managing Spotlight Initiative country or regional programmes in all geographical regions, to gather their opinion on the operation and the effectiveness and efficiency of the Spotlight Initiative. This survey, which had a 100 % response rate, allowed us to corroborate our findings on a broader scale beyond the two regions on which our audit focused.
Observations

The Spotlight Initiative set relevant objectives but alternative implementation options were not sufficiently analysed

25 In this section, we assess how the Commission decided to launch the Spotlight Initiative and how well it was designed. In particular, our audit assessed whether:

(a) the Commission’s set up of the Spotlight Initiative was reasoned and justified;

(b) the Spotlight Initiative’s thematic and geographical scope and funding decisions were based on a specific assessment of the geographical regions’ needs and the programmes’ objectives address the most relevant issues relating to violence against women and girls.

The Commission did not thoroughly compare alternative set-ups and their costs

26 The EU Gender Action Plan 2016-2020 was prepared jointly by the Commission and the European External Action Service and endorsed by the Council in October 2015. As a part of the strategic approach to implementing one of the plan’s three main priorities – stopping violence against women and girls – the Commission decided to launch a flagship initiative focusing on all forms of gender discrimination and violence.

27 In 2017, DG INTPA identified four options for a new gender initiative:

(1) a delegation agreement with member states, which would guarantee visibility for the Commission and commitment from the member states;

(2) direct management, which would maximise visibility for the Commission and entail no specific management costs. However, the Commission lacked the staff necessary to manage the workload;

(3) a thematic trust fund, which would create high visibility in the press. However, DG INTPA had no previous experience with thematic trust funds;
(4) a delegation agreement with UN organisations, which would reduce the management burden on Commission staff and accelerate the initiative's implementation. However, this would limit EU visibility and entail increased management costs.

28 After further consideration, the options of direct management and a delegation agreement with the UN remained the two main choices. Wishing to make a political statement, and wanting to support the UN and its reform, under which UN country teams from different UN entities aim to deliver as one, the Commission decided to move forward with the partnership. It saw this as a way of accelerating the initiative's implementation, but again recognised that it would cost more than the other options and that EU visibility would need close monitoring.

29 The Commission raised concerns about these costs internally and conducted an internal analysis which indicated that, on average, about 60% of total funding is spent on UN human resources costs. However, there was no thorough comparison of implementation options and no comparison of costs, for example with benchmarks or best practice from other programmes, to justify the choice made. For more information on the Spotlight Initiative’s costs, see paragraphs 67-70.

The Spotlight Initiative addresses beneficiaries’ needs, but there were shortcomings in funding decisions and in the selection of countries

30 VAWG is a complex issue, requiring mutually reinforcing measures at multiple levels to achieve sustainable results, which the Spotlight Initiative addressed through the ‘Theory of Change’ and six pillars (see Figure 5).

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8 Questions and Answers: EU-UN Spotlight Initiative to end violence against women and girls, EC fact sheet, September 2019, p. 1.

9 Spotlight Initiative pillar-assessed grant or delegation agreement, Annex I, “Description of the action”, p. 11.
The Spotlight Initiative’s scope is based on needs assessments, and its objectives are relevant for addressing violence against women and girls.

31 The Spotlight Initiative design started with the approval of the regional theories of change, and then continued with the approval of the regional investment plans (RIPs), and the country and regional programmes. Figure 9 describes the design process in Africa.

Figure 9 – Spotlight Initiative design process – Africa

- Approval of African regional theory of change prepared by UN
- Approval of African regional investment plan (RIP)
- Preparation of African country programmes involving the UN teams, EU delegations, governments and CSOs
- Approval of African country programmes

Source: ECA based on Spotlight Initiative OSC minutes.

32 The Commission’s definition of the concept of prevalent types of violence in specific geographical areas, for example SGBV in Sub-Saharan Africa and femicide in Latin America, was based on the evidence provided by various studies which supported the data used. The EU’s and UN’s choice of geographical areas and the thematic approach for each therefore reflects those areas’ needs in terms of gender equality and SGBV prevention.

33 For each geographical region covered by the Spotlight Initiative, the UN prepared a regional investment plan setting out that region’s funding allocation and serving as a regional programming framework. According to the Spotlight Initiative terms of reference, the aim was to build on the knowledge and results achieved by other initiatives. These range in scope, purpose and size and, in some cases, the Spotlight Initiative was to be used to reinforce them. The RIPs include sections on lessons learned, synergies and complementarities with other programmes. However, these
sections are rather general. They provide some non-exhaustive examples of complementarity at country level but do not specify how the Spotlight Initiative will interact with these programmes or achieve complementarity or synergies with them. These issues are, in most cases, set out in the country and regional programmes.

The RIPs also refer to the contents and governance arrangements of the Latin American and African regional programmes. However, they do not mention potential synergies between country and regional programmes, or mechanisms for coordination between regional programmes and UN joint programmes to fight FGM and child marriage. There is also no coordination mechanism to ensure synergies and to avoid overlaps between funding for CSOs from different sources. In addition to the funding they receive as implementing partners under pillar 6 of Spotlight Initiative country and regional programmes, CSOs receive funding through grants from the UN Trust Fund to End Violence against Women and the Women’s Peace and Humanitarian Fund.

In addition to preparing the RIPs, the UN was responsible for drafting country and regional programmes which comprise of two phases. Phase I represents 70% of the total programme budget allocation, whereas phase II represents 30% and its funding is conditional to the successful completion of phase I. Overall, we found that programmes included comprehensive, relevant and coherent objectives and actions, which addressed beneficiaries’ needs. All programmes took account of the ‘leaving no one behind’ principle (see paragraph 10) in their actions. However, in some cases (Argentina, Mali, Mozambique, Niger, Uganda, Africa Regional Programme), the actions designed did not fully include some vulnerable groups. A key challenge was the inclusion of LGBTQI+ communities. These challenges were partially addressed in phase II in Argentina and Mozambique.

For all African and Latin American programmes, key stakeholders (governments, EU delegations, CSOs) were involved, to at least some extent, in the design of the programmes and had the opportunity to comment on beneficiaries’ needs and areas for intervention.

However, there were limitations in some cases when it came to involving stakeholders and taking their views into account. For example, the EU delegation in Nigeria disagreed with the UN’s final selection of districts to be covered by the programme, as it considered there was overlap with existing EU projects. In Mexico, the authorities of the state of Guerrero, one of the three states selected, did not take part in the consultation process and some stakeholders (the government, the EU delegation and CSOs) felt that not all their comments had been taken into account. In Niger and Mali, we found no evidence of religious leaders having been consulted.
The results of our survey of all EU delegations involved in the Spotlight Initiative were positive as far as the consultation process and the programmes’ objectives and actions were concerned. Respondents’ views varied as regards synergies and complementarity and lessons learned from previous and existing programmes (Figure 10).

Figure 10 – ECA survey results – Design of Spotlight Initiative

<table>
<thead>
<tr>
<th></th>
<th>Disagree</th>
<th>Agree</th>
<th>Neutral/Undecided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Synergies and complementarities have been applied</td>
<td>25 %</td>
<td>59 %</td>
<td>16 %</td>
</tr>
<tr>
<td>Lessons learnt have been applied</td>
<td>19 %</td>
<td>50 %</td>
<td>31 %</td>
</tr>
<tr>
<td>EU delegations input taken into account in country programme documents</td>
<td>9 %</td>
<td>72 %</td>
<td>19 %</td>
</tr>
<tr>
<td>Coherence between SI activities and objectives</td>
<td>16 %</td>
<td>78 %</td>
<td>5 %</td>
</tr>
<tr>
<td>Objectives coherent with causes of VAWG</td>
<td>3 %</td>
<td>94 %</td>
<td>3 %</td>
</tr>
</tbody>
</table>

Source: ECA survey to all Spotlight Initiative EU delegations.

Funding decisions were not based on gap assessments and the country selection process was not sufficiently documented

From the outset of the Spotlight Initiative, the Commission planned to mobilize €500 million, considering this amount appropriate to achieve results and to have an impact on SGBV. Moreover, according to the Commission, this was the maximum amount available at the time for gender and SGBV actions from EU funds. The amount was intended as seed funding to be used to test the Spotlight Initiative’s funding model and attract future investment (see paragraph 100).

The funding allocated to Africa totalled €250 million (see paragraph 21). Latin America, however, was allocated only €50 million, even though it is a high-needs region with a large number of countries and geographical area. The fact that Latin America only received the same amount as the Caribbean and the Pacific, which received €50 million each, suggests that it will be difficult for the Spotlight Initiative to meet its needs or have the same impact there as in the other areas mentioned.
41 According to the Commission, the country allocations were based on the premise that the Spotlight Initiative should demonstrate that significant investment in a single country could be a more effective way of achieving impact than smaller investments in several countries. The Commission did not perform specific financial gap assessments at country or regional level and thus could not provide any documentation to support the calculation of allocations to countries and geographical regions.

42 To select a shortlist of Spotlight Initiative countries from each region, the Commission agreed on nine criteria with the UN – two primary criteria, totalling 50 %, and seven secondary criteria (see Table 1). The Commission and the UN also agreed to exclude countries where there was active conflict but not to exclude countries in a post-conflict situation.

Table 1 – Country selection criteria

<table>
<thead>
<tr>
<th>No</th>
<th>Criteria</th>
<th>Weighting</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Prevalence of the particular form of violence in the region</td>
<td>25 %</td>
</tr>
<tr>
<td>2</td>
<td>Gender Inequality Index (GII)</td>
<td>25 %</td>
</tr>
<tr>
<td>3</td>
<td>Level of government commitment towards ending violence against women and girls</td>
<td>15 %</td>
</tr>
<tr>
<td>4</td>
<td>Absorption capacity at national level</td>
<td>10 %</td>
</tr>
<tr>
<td>5</td>
<td>Presence and capacity of UN country teams to deliver</td>
<td>5 %</td>
</tr>
<tr>
<td>6</td>
<td>Presence and capacity of EU delegations in country to engage</td>
<td>5 %</td>
</tr>
<tr>
<td>7</td>
<td>Enabling environment in country in particular for civil society</td>
<td>5 %</td>
</tr>
<tr>
<td>8</td>
<td>Existing initiatives on VAWG at regional/country level with the potential to be scaled-up</td>
<td>5 %</td>
</tr>
<tr>
<td>9</td>
<td>Possibility to produce ‘models’ for replication in other countries/capacity to influence others in the region (i.e. domino or support effect)</td>
<td>5 %</td>
</tr>
</tbody>
</table>

Source: Minutes of first OSC meeting of October 2017.

43 These selection criteria, and the percentage scores awarded for each criterion, were objective. The Commission ranked countries in Latin America based on primary and secondary criteria. However, due to other considerations after this scoring exercise, the actual selection of countries did not reflect the final ranking in all cases. For Africa, the secondary criteria were not scored, even though they were meant to account for 50 % of the overall score. The additional qualitative considerations, however, were not documented.
In Africa, out of the eight countries selected, only three were ranked in the top 10 based on the Commission’s calculation (see Table 2). Of the five Latin American countries where Spotlight Initiative activities are ongoing, only the selections of El Salvador, Honduras and Guatemala were justified on the basis of the calculation, while Argentina and Mexico were selected despite their lower ranking. In 2020, when Guatemala’s country programme had to be cancelled due to lack of government commitment, it was replaced by Ecuador, which was initially not on the shortlist or even the reserve list.

Table 2 – Country selection

<table>
<thead>
<tr>
<th>EU ranking based on primary criteria – Africa – top 10</th>
<th>Countries chosen for Spotlight Initiative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mali</td>
<td>Niger</td>
</tr>
<tr>
<td>Central African Republic</td>
<td>Mali</td>
</tr>
<tr>
<td>Niger</td>
<td>Liberia</td>
</tr>
<tr>
<td>Chad</td>
<td>Mozambique (ranked 16th in EU calculation)</td>
</tr>
<tr>
<td>Liberia</td>
<td>Nigeria (ranked 18th in EU calculation)</td>
</tr>
<tr>
<td>Democratic Republic of Congo</td>
<td>Malawi (ranked 19th in EU calculation)</td>
</tr>
<tr>
<td>Sierra Leone</td>
<td>Uganda (ranked 29th in EU calculation)</td>
</tr>
<tr>
<td>Guinea</td>
<td>Zimbabwe (ranked 32nd in EU calculation)</td>
</tr>
<tr>
<td>Equatorial Guinea</td>
<td></td>
</tr>
<tr>
<td>Ivory Coast</td>
<td></td>
</tr>
</tbody>
</table>

Source: ECA based on Commission data.

The fact that several of the countries selected for the Spotlight Initiative were not among those that originally ranked highest in terms of gender inequality or SGBV prevalence, based on established criteria, indicates that they were selected for other reasons. For example, some were selected as a result of negotiations with the UN, due to political reasons and strategic considerations10.

The country selection process was therefore not sufficiently documented to justify the final choice made. In addition to the lack of documentation on the qualitative considerations, we could not verify several datasets used for the original calculations. These were no longer available online.

10 African Regional Investment Plan, p. 52; Latin American Regional Investment Plan, p. 54.
Despite good examples of cooperation among the main stakeholders, implementation has been difficult at times, with limitations in monitoring and evaluation

47 In this section, we assess whether the Spotlight Initiative was implemented efficiently and assessed adequately. Our audit assessed whether:

(a) Spotlight Initiative actions were well-coordinated between the main stakeholders, including CSOs;

(b) Country and regional programmes were implemented in a timely manner;

(c) Spotlight Initiative programmes have measures in place to ensure cost efficiency and cost effectiveness;

(d) The Spotlight Initiative is adequately monitored and evaluated.

The implementation faced challenges and delays due to external and governance and operational constraints

48 Spotlight Initiative programmes in Africa and Latin America experienced challenges at the implementation stage. External challenges included the COVID-19 pandemic, natural disasters (e.g. floods in Uganda, hurricanes in Honduras, cyclones in Mozambique) and political factors, such as changes in political situations in almost all countries. Internal challenges included the suitability of the six-pillar approach, the lack of cooperation among stakeholders, the number of UN organisations involved, and difficulties in implementing the UN reform.

The EU and the UN cooperated well at global level, but cooperation between country teams and key stakeholders has been difficult at times

49 At global level, the joint EU/UN governing body and the OSC are responsible for the governance of the Spotlight Initiative (Annex I). The governing body provides strategic direction, advocacy and oversight. The role of the OSC is to provide effective management and coordinate all operational and technical aspects of the initiative. To prepare for OSC meetings, technical questions are resolved in advance by DG INTPA and the Spotlight Initiative Secretariat, which cooperate effectively on strategic and operational matters by means of bi-weekly meetings.
At country level, the national steering committees (see Annex I) guide and oversee the implementation of the Spotlight Initiative. In addition, other committees have been set up, such as civil society national reference groups and, in some countries, technical working groups and pillar coordination groups. Representatives of different government ministries participate in national steering committees and technical committees.

The governments of some countries (Argentina, Nigeria, Uganda, Zimbabwe) showed a high level of commitment to supporting the Spotlight Initiative. In many programmes, however, the level of government commitment was low, due to reasons such as lack of coordination and communication across ministries, insufficient staffing allocation of ministries to deal with SGBV and dissatisfaction with the government’s role in implementation.

In several countries, the EU delegations and the UN Spotlight Initiative teams cooperated well (Argentina, Ecuador, El Salvador, Honduras, Malawi, Mozambique, Uganda). However, some EU delegations complained of not being involved sufficiently in the decision-making process, of UN country teams not sharing all relevant documents, or of difficult personal relations between their staff and UN resident coordinators and/or Spotlight Initiatives coordinators.

As shown previously in Figure 5, civil society involvement through CSOs constitutes one of the six pillars of the Spotlight Initiative’s Theory of Change. CSO participation is a key part of the initiative’s approach based on human rights. It is also essential for ensuring that actions are sustainable.

CSOs contributed to the initiative’s overall design, for example by requesting a specific pillar to support civil society (pillar 6). However, the Global Civil Society Reference Group – set up to advise the Spotlight Initiative and hold it accountable to its commitments to civil society – was formed only in April 2019, by which time countries had already been selected and the process of designing the programmes had already started. Also, the Global Civil Society Reference Group initially had only an observer role in the governing body, but this was changed in 2020 to an advisory role.

CSOs joined the OSC from 2020 onwards, by which time the Spotlight Initiative’s activities had already been determined. Furthermore, since the OSC ratifies decisions for which the technicalities have already been discussed bilaterally by DG INTPA and the UN, CSOs felt they were not sufficiently involved during phase I (see paragraph 49).
At country and regional level, in some cases civil society national reference groups were set up late (Niger, Uganda, Africa Regional programme) or received funding to fully implement their work plans only in phase II (Mozambique).

**The Spotlight Initiative’s “one size fits all” model has proven difficult to apply in countries with differing contexts and characteristics**

The Spotlight Initiative’s six pillars approach (see Figure 5), provides a harmonised framework. The Spotlight Initiative operations manual stated that the six pillars had to be implemented simultaneously and in a comprehensive manner. However, at times this approach has proven difficult to implement in countries with different contexts and characteristics (see Box 1).

**Box 1**

**Some programmes found the six-pillar approach unsuitable for their country context**

In Argentina, stakeholders questioned the requirement to invest in all six pillars, as they considered that the country’s good progress on legislation should have exempted it from having to invest in pillar 1. Only 2 % of the country’s Spotlight Initiative budget was finally devoted to pillar 1.

In Mali, the challenging political context after the 2020 military coup d’état and uncertainties linked to the transitional government, caused difficulties in implementing all six pillars during phase I. This led to a reset in phase II of Mali’s budget, which then only covered pillars 3, 4 and 6 and excluded pillars 1 (policies and legislation), 2 (institutions) and 5 (data).

The high number of implementing UN organisations has affected the efficient delivery of activities.

The Spotlight Initiative’s governance structure is very complex. One aspect that adds complexity is the number of recipient UN organisations involved in programmes.

According to an Operational Steering Committee decision, the initiative should be implemented by a maximum of five UN organisations per country programme (six if duly justified). The UN’s guidance note on joint programmes states that the number of participating UN organisations in joint programmes should not exceed five, with the

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11 Minutes of the OSC meeting of June 2018.
preferred number of organisations being two to four. Almost half of African and Latin American Spotlight Initiative programmes involved five or more UN organisations (see Table 3). Several EU delegations expressed their preference for the involvement of fewer organisations. Before the Spotlight Initiative, UN programmes addressing VAWG involved at most two organisations\(^\text{12}\).

60 After approximately two years of programme implementation, a private consulting company carried out mid-term assessments on all country and regional programmes. In 2022, it also carried out a ‘meta review’ of Spotlight Initiative programmes in Africa and Latin America. One of the recommendations it made was to reduce the number of organisations to four unless duly justified. This was supported by interviews with key stakeholders, who considered that working with three or four organisations was the most promising approach. According to the meta review, there was agreement among key stakeholders that the higher the number of organisations involved, the higher the amount of time required for coordination and management. The programmes also became less agile and programme revision exercises more cumbersome. It was also more challenging to mobilise and create a joint vision across five organisations than across three.

Table 3 – Number of UN organisations involved in African and Latin American programmes

<table>
<thead>
<tr>
<th>Spotlight Initiative programmes</th>
<th>Number of organisations per programme (phase I)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ecuador, Latin America regional programme</td>
<td>3</td>
</tr>
<tr>
<td>El Salvador, Honduras, Malawi, Mozambique, Niger, Africa regional programme</td>
<td>4</td>
</tr>
<tr>
<td>Argentina (*), Liberia, Mali (**), Nigeria, Uganda</td>
<td>5</td>
</tr>
<tr>
<td>Mexico (***)  Zimbawbe</td>
<td>6</td>
</tr>
</tbody>
</table>

Note: (*) Argentina has six agencies since phase II. (***) Mali has three agencies in phase II. (***) Mexico has five agencies in phase II.

\(^{12}\) UNFPA-UNICEF Joint Programme on the Elimination of Female Genital Mutilation and UNFPA-UNICEF Global Programme to End Child Marriage.
Despite operational challenges for the implementing UN organisations, steps have been taken towards higher efficiency

61 One objective of the Spotlight Initiative was to support UN reform (see paragraph 28). A positive aspect of this reform is that in some countries, since the start of phase II, UN organisations have engaged in joint procurement and recruitment procedures and carried out joint monitoring visits. In some countries (Liberia, Malawi, Mali), everyone involved in the Spotlight Initiative from the UN works in the same building, which increases coordination and decreases logistical and administrative costs.

62 However, as a pilot for UN reform, the implementation of the Spotlight Initiative has faced several challenges. One is the lack of detailed guidance for the UN organisations on delivering as one, which makes it difficult for them to implement the Spotlight Initiative in an integrated manner. Another is that there are disincentives to such integration: compared to single-organisation or traditional joint programmes, integrated programming approaches are more work-intensive, generate less visibility for individual organisations, require changes in organisational culture and pose operational challenges13.

63 In this respect, we found room for greater efficiency in the implementation of the Spotlight Initiative: different UN organisations have different recruitment, procurement, cash management, and monitoring procedures. The selection of implementing partners took longer than anticipated due, for instance, to calls for proposals in which each organisation followed its own process for vetting candidate CSOs.

64 Overall, the results of our survey of all Spotlight Initiative EU delegations (Figure 11) are in line with our findings concerning cooperation between EU delegations and Spotlight Initiative country teams, the UN reform, and the impact of the Spotlight Initiative’s governance and structure on its activities. Out of the EU delegations we surveyed, only 22 % considered that the Spotlight Initiative’s set-up (including the governance structure) functions better in comparison with other governance arrangements, e.g. bilateral agreements.

13 Hera meta review, p. 34.
Figure 11 – ECA survey results – Implementation of Spotlight Initiative in all programmes

<table>
<thead>
<tr>
<th>The new role of the UN Resident Coordinator and the new way of cooperation between UN agencies has led to effective coordination of SI activities</th>
<th>Negative</th>
<th>Positive</th>
<th>Neutral/Undecided</th>
</tr>
</thead>
<tbody>
<tr>
<td>41 %</td>
<td>44 %</td>
<td>16 %</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Overall cooperation between SI country team and EU delegations</th>
<th>Negative</th>
<th>Positive</th>
<th>Neutral/Undecided</th>
</tr>
</thead>
<tbody>
<tr>
<td>22 %</td>
<td>69 %</td>
<td>9 %</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EU delegations role sufficient to influence the implementation and progress of the SI</th>
<th>Negative</th>
<th>Positive</th>
<th>Neutral/Undecided</th>
</tr>
</thead>
<tbody>
<tr>
<td>31 %</td>
<td>47 %</td>
<td>22 %</td>
<td></td>
</tr>
</tbody>
</table>

Source: ECA survey.

Remedial measures were taken to tackle external and governance challenges, but their follow-up was not documented

65 The Spotlight Initiative faced delays due to external and internal challenges during its implementation (see paragraph 48). The mid-term assessments, carried out after approximately two years of programme implementation, highlighted positive achievements but also challenges. While some of the recommendations were taken into account in the planning of phase II, no action plans were drafted for a structured follow-up of mid-term assessment findings and recommendations. Towards the end of the programmes, most countries adopted acceleration plans and during the pandemic, 10 programmes drew up their own COVID-19 response plans. However, there was similarly no structured annual follow-up and reporting on these plans.

66 Due to the delays, in 2022 the OSC granted all African and Latin American countries an extension until 2023, without any additional funding, to complete their programmes.

The Spotlight Initiative lacks an adequate assessment of value for money

67 We examined whether the Commission had assessed the reasonableness of the Spotlight Initiative’s costs, and whether it had assessed the initiative’s cost efficiency and cost effectiveness.
Almost one third of the total budget is allocated to the management and administration of the Initiative by the UN

68 Under the delegation agreement between the Commission and the UN, indirect costs were calculated as a flat rate amounting to 7% of the direct costs of an action. This is the maximum permitted under the financial and administrative framework agreement (FAFA) between the EU and the UN. The Commission was aware that selecting the UN as its implementing partner for the Spotlight Initiative would entail higher costs (paragraph 28). Nevertheless, it did not attempt to negotiate lower indirect costs than the 7% maximum.

69 Direct costs included programme management costs, which could account for between 18% and 22% of total direct costs. Communication and visibility costs also had to account for at least 2% of direct costs; the same applied to evaluation costs. There was no reasoned or detailed calculation of these percentages. In addition, there was a separate cost of USD 26 million, mainly for the Spotlight Initiative Secretariat and Administrative Agent at global level. Taken together, the above costs accounted for about USD 154.8 million, that is 31% of the Spotlight Initiative’s total budget of USD 505.6 million, leaving USD 350.8 million for Spotlight Initiative organisations’ implementing partners and beneficiaries (Figure 12).

Figure 12 – Spotlight Initiative costs

(budget in million US$)

| 505.6 | Total budget as of 30 June 2022 |
| 479.8 | Total budget as of 30 June 2022 net of Global cost – Secretariat – AA |
| 448.4 | Programme Direct costs (Total budget as of 30 June 2022/1.07) |
| 362.3 | Programme outcome costs |
| 9.0 | Programmes (2% of Direct costs) Phase II |
| 350.8 | Funds for SI organisations’ implementing partners and beneficiaries |
| 86.1 | Programme management costs (18% of Direct costs) (*) |
| 31.4 | Evaluation costs (2% of Direct costs) |
| 25.8 | Global cost – Secretariat – AA |
| 2.6 | Communications and visibility (2% of Direct costs) |

Note: (*) 22% in phase II for some programmes.

Source: ECA based on UN data and Spotlight Initiative guidelines.

70 At programme level, the USD 350.8 million available for Spotlight Initiative organisations’ implementing partners and beneficiaries represents around 73% of USD 479.8 million. In many cases, however, UN organisations carry out activities via
implementing partners, such as CSOs, government partners or consultants. In some cases, contracts with such partners specify flat rates to cover the partner’s indirect costs. These are reported as direct costs of the programme, which creates a cascade of indirect costs from both the UN and the implementing partner, but the Commission also has no visibility on these costs. We found such cases in Uganda and in Mexico. The mid-term assessment of the Latin American regional programme gave rise to a similar observation and a recommendation that, in future, the Commission finance intergovernmental institutions directly, in order to invest resources currently spent on UN indirect costs directly into activities.

The Commission does not assess whether Spotlight Initiative activities provide value for money

71 As the percentages for indirect costs and management costs had been set in the delegation agreement (see paragraphs 68-69), the EU delegations and DG INTPA did not assess the justification of these costs for the individual country and regional programmes. DG INTPA’s assessment of activity costs, as for example trainings, awareness campaigns, services to victims, was also limited, even though these are the only part of the Spotlight Initiative budget that is not predetermined contractually. It did not compare such costs among similar activities in the same countries to ensure they were appropriate; nor did the Commission assess the costs versus outputs of planned activities.

72 The Commission also receives no information comparing the planned and actual costs of Spotlight Initiative activities such as studies, training, awareness campaigns, and services for survivors. Moreover, while the programmes’ annual reports provide information on innovative and good practices, they provide no information on their value for money.

73 The Commission has previously established, through “pillar assessment” (an assessment carried out by the Commission to protect EU’s financial interests under indirect management) that the UN organisations’ procedures include criteria on, for example, best value for money and the use of competitive tendering. During the implementation of programmes, the Commission has therefore relied on the UN organisations’ financial control systems, and has carried out limited checks on these procedures. Out of all 26 Spotlight Initiative programmes, as of 31 December 2022 the Commission had subjected only one (Honduras) to an expenditure verification, which did not include checks on value for money.
Spotlight Initiative monitoring and evaluation does not consider cost effectiveness

According to the Spotlight Initiative’s terms of reference, its monitoring system “gathers performance data at the outcome and output levels, linking program-related and financial result indicators so evaluators can better measure the efficiency and effectiveness of the Spotlight Initiative”. However, the Spotlight Initiative’s monitoring system does not link programme outputs and outcomes to information on actual spending, which significantly limits the evaluation of the programme in terms of what was achieved in each pillar (or activity) compared to the actual cost (see Box 2).

**Box 2**

The follow-up of actual expenditure is limited

The country programme document for Mexico shows a budget for pillar 4 (Services) of USD 1 513 504. This is 22% of the total budget. In the same document there is no information on the outcome and output indicators and the targets to be reached in pillar 4 with this amount of money.

The annual narrative report 2021 (Annex A) on the other hand provides for pillar 4 data on the performance of four output indicators.

The only quantitative indicator is 4.1.2 (“Number of women and girls with access to programmes developed to integrate VAWG response into sexual and reproductive health rights, education and migration services”). The indicator has “zero” as baseline, “zero” as milestone 2021, “377” as actual figure for 2021 and “zero” target.

Given that indicator 4.1.2 has no target and no milestone for 2021 it is not possible to make a sound assessment of the progress of the activities of pillar 4.

Moreover, there is no information in the Spotlight Initiative annual report 2021 on the budget and the actual expenditure for pillar 4 activities linked to outputs measured by indicator 4.1.2. Therefore, it is also not possible to assess the cost effectiveness of these activities, i.e. whether the actual cost per number of women and girls addressed by activities of pillar 4 is reasonable and comparable to cost per output initially budgeted.

The mid-term assessments did not examine cost effectiveness, and this was not requested by the Commission. Nonetheless, the ‘mid-term assessments’ recommended reporting by outcome. The UN rejected this recommendation but stated that its Multi-Partner Trust Fund Office, as the administrative agent of UN funds (see paragraph 17), might be sufficiently mature and advanced to offer such reporting in future initiatives.
We found, however, that the Commission has included cost effectiveness in other programmes in external action. The Directorate-General for European Civil Protection and Civil Aid Operations has developed cost-effectiveness guidance for its evaluations in 2016, and included the assessment of cost effectiveness in several evaluations.

The monitoring and reporting framework allows limited assessment of performance at programme and geographical level

The Spotlight Initiative’s results framework is based on the UN’s “results-based management” principles. Results-based management is a management strategy under which everyone contributing directly or indirectly to achieving a set of desired results ensures that their processes, products and services likewise contribute to achieving those results.

The results-based management principles and methodologies make a clear distinction between outputs, which are within the direct control of a given programme (principle of attribution) and its managers, and outcomes, which are not as they can be influenced by many other factors (principle of contribution).

The Spotlight Initiative results framework has four impact indicators linked to the SDGs, 18 outcome indicators and 71 output indicators. For each programme, baseline, milestones and targets were to be set for all indicators. Annex A of each programme’s annual report includes the baseline figures, the year’s milestone and actual results, and the targets for the end of the programme. The Spotlight Initiative’s “global annual narrative report” provides these figures for the Spotlight Initiative as a whole. While the results framework has a very high number of indicators, there is none to monitor the implementation of the “leaving no one behind” principle.

Out of the 13 country programmes and two regional programmes that we reviewed, 10 used specific studies to identify the baseline values for indicators. The others had no up-to-date study to support the setting of the targets. Furthermore, nine of the baseline studies done were conducted after the programme had already started and the targets for the indicators had been set. In Uganda, for example, the programme started in 2019, but the study was only completed in 2021.

The lack of reliable baselines calls into question the way the targets were set. We noted some targets that had already been achieved before the start of the programme and targets that were significantly exceeded, indicating that they had not been appropriate in the first place.
In addition, for the outcome and output indicators, neither the Commission nor the Spotlight Initiative Secretariat checks the reliability of the reported annual data.

In most cases, output indicators present figures on specific activities undertaken during the year, such as the number of people that participated in training. For these indicators, the programmes’ annual reports compare the actual figures for a given year with the milestones set for that year, but do not show actual versus planned cumulative progress since the start of the programme. This significantly limits the results framework’s assessment of the Spotlight Initiative’s performance.

Annex A to the 2021 global annual narrative report provides, for the first time, consolidated data for outputs and outcome indicators at global level. While this is a good initiative, we consider that such an overview should have been available earlier. Moreover, not all countries report on all indicators, which limits consolidation.

For some outcome indicators, government data can be used to assess programme performance (see Box 4, Box 5). However, the following issues prevent these indicators from adequately reflecting programme performance:

(a) All country programmes focused their activities on a limited number of geographical areas (regions, counties or districts) in their respective countries. However, programme reports only provide outcome data at national level.

(b) Given the existence of many other factors that affect the achievement of an outcome indicator, such as other programmes or government actions, Spotlight Initiative activities contribute to their achievement only partially and the extent cannot be determined. This is recognised by the results-based management principles (see paragraph 78).

(c) In many cases, national statistical surveys data is lacking, as countries normally collect it once every four or five years.
While the global annual reports provide financial information on selected country or regional programmes, they provide only limited financial information on geographical areas and funding allocation. The 2021 global annual report, for example, as requested by the Commission, mentions that the Spotlight Initiative allocated USD 116 million to advance sexual and reproductive health and rights in its programmes in Africa, exceeding its target of USD 100 million. However, it does not report figures on funds allocated in Africa to fight FGM and child marriage, as this is not monitored separately. The global report also does not include a consolidation of indicators at geographical level, combining information from country programmes and the regional programme, and therefore does not allow an assessment of the progress made in a particular region.

There are positive achievements, but their sustainability is not ensured

In this section, we assess whether the Spotlight Initiative makes an effective contribution to ending violence against women and girls. In particular, we assessed whether the initiative achieved results and whether these results were sustainable. We also examined whether the initiative has ensured the visibility of the EU’s commitment and funding.

Spotlight Initiative programmes have delivered outputs, but as yet with limited measurable impact

Our work for the three countries selected (see Annex II), and desk review of the other programmes, show that Spotlight Initiative programmes achieved outputs in all African and Latin American countries, across all pillars, but to differing degrees and with varying success.

Spotlight Initiative has contributed to address violence against women and girls but it is difficult to assess whether it achieved its expected results

In pillar 1 – Policies and Legislation, despite the Spotlight Initiative’s contributions to strengthening the legislative framework (see Annex III), we found that in most cases, it was difficult to assess the extent to which specific results in this area were actually attributable to the Spotlight Initiative. This is because CSOs and other stakeholders had already been supporting other initiatives to improve existing legislation.
90 Also, while new laws to address VAWG have been approved, there are no Spotlight Initiative indicators monitoring their implementation, even though the implementation of laws is a key issue (Box 3).

[Box 3]

**Pillar 1 activities in Liberia**

In Liberia, the Spotlight Initiative contributed to an unprecedented official policy statement by traditional leaders on 25 June 2019, banning FGM for one year (later extended for another three years) and closing the ‘bush schools’ in which it takes place.

However, because there was not yet any legislation banning FGM, victims of the practice had problems accessing justice. Interviews during our field visit indicated that FGM was still being practised in counties that had signed up to the ban.

In August 2019 the Domestic Violence Act was formally approved. However, its application and implementation are still hampered by practical and cultural obstacles. The Spotlight Initiative has no specific indicators for monitoring the implementation of this law, such as measuring government activities, protocols and institutions responsible for the implementations, or public awareness.

91 In pillar 2 – Institutions, programmes provided training to members of parliament and government officials to strengthen their capacities to develop and deliver programmes that prevent and address VAWG (Argentina, Honduras, Mexico, Liberia, Malawi, Mali, Mozambique, Niger, Nigeria, Uganda, Zimbabwe). Several programmes also engaged in gender-responsive budgeting activities to eliminate VAWG. Spotlight Initiative outcome indicator 2.2 measures the proportion of national budgets allocated to the prevention and elimination of all forms of VAWG. In 2021, in Latin America, only Argentina reported improvement on this indicator.
In pillar 3 – Prevention, almost all African and Latin American programmes supported in-school and out-of-school programmes for girls and boys on gender-equitable norms and sexual and reproductive rights, and campaigns challenging harmful social norms and gender stereotyping. However, in 2021 most countries did not have up-to-date statistics on changes in social norms regarding violence against women and girls, and those who did showed varying success. Information on the outcomes at country level was therefore limited (Box 4).

**Box 4**

**Changing social norms regarding violence against women and girls**

Spotlight Initiative outcome indicator 3.1 reports data on the proportion of people who think it is justifiable for a man to beat his wife/intimate partner.

In Latin America, Honduras and El Salvador reported an improvement (i.e. a reduction compared to the baseline) in this indicator in 2021, while Argentina reported worse results (3.1 %, compared to a 1.5 % milestone and 2 % baseline). Ecuador and Mexico had no data available.

In six African countries (Malawi, Mali, Mozambique, Niger, Uganda, Zimbabwe) no data was available, and in two (Liberia, Nigeria) the indicator deteriorated compared to the baseline year.
In pillar 4 – Services, Spotlight Initiative programmes mainly supported activities to improve the access for women and girls to programmes developed to incorporate response to VAWG into sexual rights and health education services. They also supported activities to strengthen the knowledge and capacity of government service providers to deliver quality services to survivors of VAWG. However, there are serious challenges concerning the reliability of data, which make it difficult to assess the outcomes of pillar 4 activities (Box 5). For example, police and court records are incomplete and not detailed enough to classify a report as pertaining to violence against women and girls\(^\text{14}\).

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**Box 5**

**Pillar 4 activities – Services**

Spotlight Initiative outcome indicator 4.2 records the number of VAWG cases reported to the police, prosecuted and leading to a conviction.

In Latin America, Argentina, Ecuador, El Salvador and Mexico did not report any data for indicator 4.2 in their 2021 annual narrative reports. Honduras reported 107,466 cases to the police, against a baseline of 19,840, but no data is available on cases brought to court or convictions.

In Africa, Liberia’s figures show a decrease in the number of cases reported to the police (920 cases, from a baseline of 2,105). Nigeria saw an increase in the number of cases reported to the police (8,092, from a baseline of 230). However, the proportion of cases brought to court (23%) decreased from the 50% baseline. The number of convictions (as a percentage of cases brought to court) also decreased: to 2%, from a 10% baseline.

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\(^\text{14}\) Spotlight Initiative Outcome Indicator 4.2 Methodological note, pp. 2-3.
In pillar 5 – Data, the Spotlight Initiative has achieved variable results in helping to improve publicly available data and statistics on VAWG: in some cases, new surveys and studies have been completed, while in other cases activities are still works in progress (see Box 6 and Annex IV).

Box 6

Pillar 5 – Argentina

The Spotlight Initiative in Argentina supported the National survey on the prevalence and incidence of gender-based violence (Encuesta Nacional de Prevalencia e Incidencia de la Violencia basada en género) which was published in 2022.

It also supported the implementation of the Integrated system for gender-based violence cases (Sistema Integrado de Casos de Violencia por Motivos de Género (SICVG)). In 2022 the implementation of the system was still work in progress.

In pillar 6 – Women’s movement, while the Spotlight Initiative provided many CSOs with financial support and training, no or limited information is available to assess the extent to which these organisations have strengthened their capacity and influence to work towards ending VAWG.

The statistics do not show a reduction in violence against women and girls

There is no evidence of violence against women and girls having decreased in the various countries covered by the Spotlight Initiative. In Latin America, none of the Spotlight Initiative programmes recorded a decrease in the number of femicide cases. For African and Latin American programmes, data on indicator SDG 5.2.1 (“Proportion of ever-partnered women and girls aged 15 years and older subjected to physical and/or sexual violence by a current or former intimate partner, in the previous 12 months, by form of violence and by age”) is not yet available.
The results of our survey of all Spotlight Initiative programmes show that half of EU delegations believe the initiative has had a positive impact on ending VAWG (see Figure 13).

Figure 13 – ECA survey results – Spotlight Initiative impact

<table>
<thead>
<tr>
<th>Negative</th>
<th>Positive</th>
<th>Neutral/Undecided</th>
</tr>
</thead>
<tbody>
<tr>
<td>12.5 %</td>
<td>50.0 %</td>
<td>37.5 %</td>
</tr>
</tbody>
</table>

The SI has had an impact on ending violence against women and girls in your country.

Source: ECA survey.

Overall, while the initiative has delivered outputs, a four-year implementation period at country level (which includes the programme design phase) is too short to create lasting change for a complex issue in a complicated environment. Eliminating violence against women and girls requires shifting social norms, as well as a complete reform of institutions. Previous studies showing transformational change in development cooperation have been carried out on projects with a time span of 10 to 20 years. Our survey of all EU delegations included the question: “What do you consider to be a reasonable timeframe to achieve lasting change in your country in the field of ending VAWG (years)?”; the average answer was 16 years.

There are risks that results will not be sustained and lessons learned will not be used in future programmes

We examined whether the Spotlight Initiative has succeeded in attracting additional funding, whether measures have been taken to ensure the sustainability of its activities, and whether lessons learned are available and easy to access for future EU actions to fight VAWG.

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15 Supporting Transformational Change – Case studies of successful development cooperation, UNDP, 2011.
The initiative has not attracted additional funding and there are risks to the sustainability of activities

From the outset, the EU contribution to the Spotlight Initiative was supposed to be “seed funding” to encourage additional funding from new donors, at both global and country level. However, as of 30 November 2022, no additional donors had been found, except for symbolic amounts. One possible reason, advanced by the Commission, is that potential donors wanted to see results before committing to funding. Another is that the minimum contribution required to obtain a seat on the OSC or national steering committees was too high. Lastly, as the EU contributes about €500 million to the initiative, other donors with smaller contributions would have less influence on decision-making and less visibility.

As of 30 November 2022, only Ecuador, El Salvador, Honduras and Zimbabwe had drafted exit or sustainability strategies. However, no activities had been defined in Ecuador’s strategy, and for Honduras it is not clear who will carry out the activities or where the money will come from. The lack of exit strategies poses a significant risk to the sustainability of activities, especially considering the initiative’s complexity and short timeframe.

An EU-funded successor programme to the Spotlight Initiative is planned in Uganda, dealing with SGBV and sexual and reproductive health rights. It will have a budget of €20 million and form part of a €60 million annual action plan. However, as of 31 December 2022, in most countries it was not yet clear which Spotlight Initiative activities will be continued or how much financing the EU delegations will allocate to them.

The EU has set aside €18 million to support the dissemination of knowledge and examples of best practice from the Spotlight Initiative, with the UN as its implementing partner. A further €22 million has been allocated to increase global advocacy for the elimination of gender-based violence and to strengthen CSOs.\(^\text{16}\)

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\(^{16}\) Commission Implementing Decision on the financing of the multiannual action plan for the thematic programme on Global Challenges, C(2022)6137 of 23.8.2022.
The results of our survey of all Spotlight Initiative programmes show that only 31% of EU delegations believe the Spotlight Initiative placed sufficient emphasis on sustainability (Figure 14).

**Figure 14 – ECA survey results – Spotlight Initiative sustainability**

<table>
<thead>
<tr>
<th>The SI put sufficient emphasis on the sustainability of the activities to combat VAWG after the SI itself ends</th>
<th>Negative</th>
<th>Positive</th>
<th>Neutral/Undecided</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>19%</td>
<td>31%</td>
<td>50%</td>
</tr>
</tbody>
</table>

*Source: ECA survey.*

The Spotlight Initiative has collected information on lessons learned, but the way this information is stored online makes it hard to access.

The Spotlight Initiative has generated considerable knowledge about activities to address VAWG. To maximise its benefit, the knowledge developed under the Spotlight initiative needs to be consolidated in an easily accessible format for interested users. However, the information is currently scattered and not easy to find. There was information at the time of the audit on good practices in countries annual reports on the MPTFO website, on the COSI Extranet, and in countries ad hoc repositories (see paragraph 107). However, there was no specific section to collect lessons learnt and good practices from all countries on the Spotlight Initiative website, and no links to the above-mentioned sources of information.

The annual narrative reports, publicly available, identify promising activities or examples of good practice, which can be extrapolated to other geographical areas subject to validation by external experts. However, as of 31 December 2022, such good practices were not collected or analysed by external experts, and the annual reports do not specify how promising activities can be continued in the future. In reality, only practices from Liberia (such as the drafting of an inventory of FGM practitioners in all counties where FGM is prevalent) were actually extrapolated in phase II to other geographical areas.
Information about studies and activities carried out under Spotlight Initiative programmes was supposed to be stored in the COSI Extranet, a centralised repository which includes a virtual library with separate folders for each programme. While the existence of a unique repository for all Spotlight Initiative programmes is positive, the information it contained at the time of our audit was incomplete in most cases. A few programmes (Argentina, Honduras and Liberia) have developed their own ad hoc repositories for storing information on activities broken down by pillar. Providing structured information online allows easy access and navigation for stakeholders.

The Global Platform, a knowledge-sharing initiative with a budget of USD 767 000, was due to be launched in 2023 (three years after implementation of the Spotlight Initiative started). It consists of three components: the Shine platform, which is already operational, a knowledge production component (comprising briefs on specific topics) and a component for fostering exchange (e.g. the Global Learning Symposium).

The visibility of the contribution from the EU, as sole funder of the initiative, has not always been ensured

With the launch of the Spotlight Initiative, the EU wanted to make a visible, unprecedented financial commitment to ending violence against women and girls (see paragraph 02). However, we found that the Spotlight Initiative activities have not always ensured EU visibility. In some cases, specific care was not taken to include the Spotlight Initiative logo and branding in supported publications or on the websites of organisations receiving financial support or involved in implementing activities. The ‘Spotlight Initiative Guidelines for Logo use by UN entities and EU-funded activities’ specify that all EU-funded activities must be identified with the EU flag. We found activities in Liberia and Niger where this was not the case. Also, on its website, the Shine platform (see paragraph 108) is presented as a product of the UN Trust Fund for Women instead of a joint product with the Spotlight Initiative.

The results of our survey of all Spotlight Initiative programmes also show that 60 % of the EU delegations found it challenging to cooperate with the UN country teams to ensure visibility for the EU.
Conclusions and recommendations

111 Overall, we found that the Spotlight Initiative was an ambitious attempt by the Commission to address violence against women and girls, but so far it has had limited measurable impact. Violence against women and girls is a complex issue requiring long-term action, meaning the Spotlight Initiative’s four-year duration represents a short window to bring about lasting change. While the initiative has achieved outputs, and has benefitted women and girls, it is difficult to assess the extent to which it has achieved its intended results. We also identified room for greater efficiency and better value for money.

112 The Commission’s choice of the UN as its implementing partner was a political decision aimed at supporting multilateralism. When making this decision, the Commission did not undertake a thorough comparison of alternative implementation set-ups or their related costs to justify the choice made. This despite the almost €500 million contribution made by the EU.

113 The Spotlight Initiative addresses the needs of final beneficiaries, and its objectives are relevant for addressing violence against women and girls. However, we found shortcomings in funding decisions and in the selection of countries. There were no calculations or gap assessments to support funding allocations, and the country selection process was not sufficiently documented (paragraphs 26-46).

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;

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

Target implementation date: Actions funded from January 2025
The implementation of the Spotlight Initiative featured good examples of cooperation among the main stakeholders, but also faced challenges and delays due to external and internal factors. Its approach, based on activities in six different pillars, provided a harmonised framework but proved difficult to implement in countries with differing contexts and characteristics. Cooperation between country teams and key stakeholders was also difficult at times, and not all stakeholders felt they were sufficiently included.

The Spotlight Initiative was intended to support the UN reform, under which several UN organisations implementing a programme in the same country work together as one. As a pilot for this reform, the initiative faced challenges and the high number of implementing organisations made the initiative’s governance more complex (see paragraphs 48-66).

**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;

(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**

An adequate assessment of the Spotlight Initiative’s value for money is lacking. The Commission was aware that selecting the UN as its implementing partner would entail higher costs, but it did not attempt to negotiate lower indirect costs than the maximum set in the financial and administrative framework agreement. Almost one third of the total budget is allocated to the management and administration of the Initiative by the UN. Management costs, as well as communication, visibility and evaluation costs, were all calculated as percentages of a programme’s direct costs, but there was no detailed reasoning behind the percentages applied.
The Commission’s assessment of activity costs was also limited as it did not compare such costs among similar activities in the same countries or regions to ensure they were appropriate; nor did the Commission assess the costs versus outputs of planned activities. Moreover, the Spotlight Initiative’s monitoring and evaluation framework does not take account of cost effectiveness (see paragraphs 67-76).

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.

(b) ensure that monitoring and evaluation of future 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 Spotlight Initiative’s monitoring and reporting arrangements do not allow a sound assessment of its performance. Reporting of programmes’ cumulative performance is limited, as their annual reports in most cases compare the actual figures for a given year with the milestones set for that year, but do not show actual versus planned cumulative progress since the start of the programme. There is also no tracking of amounts allocated to specific topics, such as fighting female genital mutilation or child marriage.

We found that the Spotlight Initiative programmes have delivered outputs in all African and Latin American countries, but to differing degrees and with varying levels of success. Furthermore, due to the characteristics of the results framework, the short implementation timeframe, and incomplete data, it has not yet been possible to measure impact of activities, i.e. the resulting improvement in the beneficiaries’ situations.
From the outset, the EU contribution to the Spotlight Initiative was supposed to be “seed funding” to encourage additional funding from new donors, at both global and country level. However, this objective has not been achieved. Most of the programmes have not yet incorporated exit and sustainability strategies, which poses a significant risk to the sustainability of activities.

The Spotlight Initiative has generated considerable knowledge about activities to address violence against women and girls. However, such knowledge is currently scattered and not easy for interested users to access. The annual reports gather examples of what Spotlight Initiative considers to be good practices, but these have not been analysed by external experts nor collected at global level, and there is no assessment of how to continue promising activities in the future.

We found that Spotlight Initiative activities have not always ensured visibility for the EU, despite it being the sole funder of the initiative. This was a risk that had already been identified by the Commission when selecting the UN as its implementing partner (paragraphs 77-110).

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;

(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;

(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
This report was adopted by Chamber III, headed by Mrs Bettina Jakobsen, Member of the Court of Auditors, in Luxembourg at its meeting of 4 July 2023.

For the Court of Auditors

Tony Murphy
President


Annexes

Annex I – Spotlight Initiative Governance structure

### Annex II – Sampled activities as of 30 November 2022

<table>
<thead>
<tr>
<th>No</th>
<th>Activity</th>
<th>Country</th>
<th>Budget</th>
<th>Status</th>
<th>Outputs achieved</th>
<th>Results achieved (*)</th>
<th>Results are likely to be sustainable</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Activity 1.1.1: Provide technical capacity development and support to the Law Reform Commission, legislative drafting Bureau, Budget office and selected legislative Committees of the Legislature on integration of Human Rights based approaches in legislative reforms; elaboration of regulatory framework for prevention of sexual exploitation and abuse and harmonisation of customary norms with human rights standards and principles. Sub Activity 1.1.1.3: Provide support to the Law Reform Commission to establish a gender and human rights desk to audit domestic Violence Law and develop a road map to inform Law reform process in liaison with relevant Ministries. Sub Activity 1.1.1.10: Support the Law Reform Commission to develop and validate human rights and gender checklists to guide legislative committees and CSOs in reviewing bills to ensure that laws’ enactment are gender sensitive and human rights compliant.</td>
<td>Liberia</td>
<td>$97 648</td>
<td>Completed</td>
<td>Partially</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>No</td>
<td>Activity</td>
<td>Country</td>
<td>Budget</td>
<td>Status</td>
<td>Outputs achieved</td>
<td>Results achieved (*)</td>
<td>Results are likely to be sustainable</td>
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<tr>
<td>2</td>
<td>Activity 3.2.3: Transform 4 Bush Schools into vocational schools and heritage camps to be used as a centre for regular dialogue and skills training on positive traditional practices. Activity 3.2.4: Provide alternative economic activities for Traditional Practitioners and establish a simple rite of passage program for women and girls without cutting/FGM in the 5 counties.</td>
<td>Liberia</td>
<td>$2,277,392</td>
<td>Ongoing</td>
<td>Partially</td>
<td>Partially</td>
<td>No</td>
</tr>
<tr>
<td>3</td>
<td>Activity 3.2.5: Support Ministry of Education to roll-out Comprehensive sexuality education curriculum and establish school health programs to implement the minimum package of school health that covers sexual and reproductive health and rights and sexual gender based violence and harmful practices and strengthen referral linkages with existing One Stop Centres and youth friendly services in catchment communities.</td>
<td>Liberia</td>
<td>$518,452</td>
<td>Ongoing</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>4</td>
<td>Activity 4.2.1: Reported girls’ survivors of violence against women and girls provided with decentralised, multi-sectorial child sensitive and child centred victim assistance (health, education, psychosocial and justice) including socio-economic empowerment activities through harmonised case</td>
<td>Liberia</td>
<td>$460,308</td>
<td>Ongoing</td>
<td>Yes</td>
<td>Partially</td>
<td>No</td>
</tr>
<tr>
<td>No</td>
<td>Activity</td>
<td>Country</td>
<td>Budget</td>
<td>Status</td>
<td>Outputs achieved</td>
<td>Results achieved (*)</td>
<td>Results are likely to be sustainable</td>
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<tr>
<td>5</td>
<td>Activity 4.2.3: Strengthen capacity of county referral hospitals and health centres to perform basic medical forensic examinations, specimen preservation and referral.</td>
<td>Liberia</td>
<td>$382 991</td>
<td>Ongoing</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>6</td>
<td>Activity 5.2.4: Strengthen capacities to analyse and disseminate data including publication of policy briefs, fact sheets, etc. Including multi-stakeholder quarterly review and analysis of data from the...</td>
<td>Liberia</td>
<td>$79 000</td>
<td>Ongoing</td>
<td>Yes</td>
<td>Partially</td>
<td>No</td>
</tr>
<tr>
<td>No</td>
<td>Activity</td>
<td>Country</td>
<td>Budget</td>
<td>Status</td>
<td>Outputs achieved</td>
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<td>7</td>
<td>gender based violence IMS to inform laws, policies and programmes.</td>
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<td></td>
<td>Activity 6.3.2: Transfer grants to 25 local women rights organisations and five CSOs Secretariats and enhance their operational capacities to address violence against women and girls in the five Spotlight Counties.</td>
<td>Liberia</td>
<td>$361 618</td>
<td>Ongoing</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>8</td>
<td>All under output 1.1 (prepare a diagnosis and proposal of reform for regulatory framework at the federal, state, and municipal levels in the three selected states, and consultations, lobbying and communication, forum).</td>
<td>Mexico</td>
<td>$147 559</td>
<td>Ongoing</td>
<td>Partially</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>9</td>
<td>Activities 2.1.4: Systematization of existing studies on Gender Violence Alert mechanism; 2.1.5: Model for monitoring and evaluation of Gender Violence Alert actions, having as an example the State of Mexico.</td>
<td>Mexico</td>
<td>$122 900</td>
<td>Completed</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>10</td>
<td>Activity 3.1.2: Schools in Action for Equality</td>
<td>Mexico</td>
<td>$158 960</td>
<td>Completed</td>
<td>Yes</td>
<td>Yes</td>
<td>Partially</td>
</tr>
<tr>
<td>No</td>
<td>Activity</td>
<td>Country</td>
<td>Budget</td>
<td>Status</td>
<td>Outputs achieved</td>
<td>Results achieved (*)</td>
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<tr>
<td>11</td>
<td>Activity 3.3.1: Recovery of public spaces based on the strengthening and promotion of leadership by women and girls</td>
<td>Mexico</td>
<td>$120 015</td>
<td>Completed</td>
<td>Yes</td>
<td>Partially</td>
<td>Yes</td>
</tr>
<tr>
<td>12</td>
<td>Activity 4.1.1.5: Strategy for provisional free accommodation</td>
<td>Mexico</td>
<td>$88 271</td>
<td>Completed</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>13</td>
<td>Activity 6.1.3: Small grants</td>
<td>Mexico</td>
<td>$185 648</td>
<td>Completed</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>14</td>
<td>Activity 1.1.1: Support Government to review/amend existing laws and regulations and pass pending bills</td>
<td>Uganda</td>
<td>$444 000</td>
<td>Ongoing</td>
<td>Partially</td>
<td>Partially</td>
<td>Partially</td>
</tr>
<tr>
<td>15</td>
<td>Activity 2.1.7: Training and hands-on mentoring of subnational government on planning, gender-responsive budgeting (GRB), multi-sectoral coordination, and accountability systems</td>
<td>Uganda</td>
<td>$152 148</td>
<td>Completed</td>
<td>Partially</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>16</td>
<td>Activity 3.2.1: Scale up the evidence-based Start, Awareness, Support and Action (SASA) Community mobilization and social norm change model</td>
<td>Uganda</td>
<td>$299 709</td>
<td>Completed</td>
<td>Partially</td>
<td>Partially</td>
<td>No</td>
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<tr>
<td>No</td>
<td>Activity</td>
<td>Country</td>
<td>Budget</td>
<td>Status</td>
<td>Outputs achieved</td>
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<tr>
<td>17</td>
<td>Activity 4.1.14: Support provision of legal aid and access to justice for survivors of violence against women and girls in target districts</td>
<td>Uganda</td>
<td>$627,133</td>
<td>Ongoing</td>
<td>Partially</td>
<td>Partially</td>
<td>No</td>
</tr>
<tr>
<td>18</td>
<td>Activity 5.1.2: Undertake adaptation, harmonization and standardization of data collection tools and data sharing protocols</td>
<td>Uganda</td>
<td>$269,000</td>
<td>Ongoing</td>
<td>Partially</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>19</td>
<td>Transfers and Grant to Counterparts women’s rights organisations to support coordinating efforts to jointly advocate on ending violence against women and girls</td>
<td>Uganda</td>
<td>$939,527</td>
<td>Completed</td>
<td>Partially</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

*Note:* (*) Improvements in the beneficiaries’ situation resulting from the activities.
### Annex III – Spotlight Initiative’s contribution to new laws and policies under pillar 1

<table>
<thead>
<tr>
<th>Countries</th>
<th>Adoption of new laws/policies or of amendments of existing laws/policies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Argentina</td>
<td>None. Spotlight Initiative actions supported the implementation of existing laws and policies.</td>
</tr>
<tr>
<td>Ecuador</td>
<td>Reform to comply with court ruling on abortion for rape (amended)</td>
</tr>
<tr>
<td></td>
<td>National Protocol on Criminal Investigation of Femicide (new)</td>
</tr>
<tr>
<td></td>
<td>A comprehensive reparation policy for victims of VAWG and dependents of victims of femicide (new)</td>
</tr>
<tr>
<td></td>
<td>Municipal ordinance and regulation for financing ending VAWG in Cuenca (amended)</td>
</tr>
<tr>
<td>El Salvador</td>
<td>Ratification of the Convention against Discrimination in Education including a special section related to political violence against women.</td>
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<td></td>
<td>Reform of the Special Comprehensive Law for Women’s Access to a Life Free of Violence.</td>
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<tr>
<td></td>
<td>Reform related to the increase of penalties for aggressors for the illegal dissemination of personal information that damages the honour, privacy, family and image of women and for anyone who publishes, shares, sends or distributes pornographic material by any computer or electronic means in which the image or identity of women is used without their consent.</td>
</tr>
<tr>
<td>Honduras</td>
<td>Extraordinary measures of prevention, and attention to violence against women and actions to guarantee gender equality, during the national emergency declared to contrast COVID-19 pandemic.</td>
</tr>
<tr>
<td>Mexico</td>
<td>Reforms approved by Chihuahua Congress in 2021 comprise:</td>
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<td>— Strategies for the prevention and eradication of discrimination in Chihuahua;</td>
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<td></td>
<td>— Incorporation of orphan girls and boys in the provision of services at Centres of Attention and creates a unified mechanism to register cases with high risk of femicide;</td>
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<tr>
<td></td>
<td>— Reforms approved at the national level in March 2022 contribute to Gender Violence Alerts, establishing 45 days as the time limit for the government’s official recognition of the critical condition of gender-based violence.</td>
</tr>
<tr>
<td>Liberia</td>
<td>The 2020 National Anti-SGBV Road Map.</td>
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<tr>
<td></td>
<td>The official policy statement by traditional leaders on 25 June 2019 introduced a one year ban (later extended for another three years) of female genital mutilation.</td>
</tr>
<tr>
<td>Countries</td>
<td>Adoption of new laws/policies or of amendments of existing laws/policies</td>
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<tr>
<td>Malawi</td>
<td>The Msundwe case resulted in ground-breaking legal precedents to protect survivors from sexual violence perpetrated by the Malawi Police, and establish mechanisms to prevent such incidents. Model policies for Gender and Sexual Harassment adopted.</td>
</tr>
<tr>
<td>Mali</td>
<td>None. Since August 2020 the country has had political instability and a coup d’état.</td>
</tr>
<tr>
<td>Niger</td>
<td>None.</td>
</tr>
<tr>
<td>Nigeria</td>
<td>The 2019 Prevention, Prohibition and Redress of Sexual Harassment in Tertiary Educational Institutions Bill, passed by the Senate in July 2020. All six Spotlight Initiative focus states have now adopted and passed the Violence Against Persons (Prohibition) Act and the Child’s Rights Act. The Child Protection Bill in Sokoto was passed into Law by the Sokoto State House of Assembly and signed by the Governor in December 2021.</td>
</tr>
<tr>
<td>Uganda</td>
<td>The National Child Policy in 2020. The Prosecutor Plea Bargaining Guidelines approved in 2021 to facilitate the reduction of case backlogs, which often impede the timely prosecution of sexual violence cases.</td>
</tr>
<tr>
<td>Zimbabwe</td>
<td>On 27 October 2021, the President of Zimbabwe launched the High-Level Political Compact on ending Gender Based Violence and Harmful Practices in Zimbabwe. Its commitments and actions aim to ensure that women and girls realize their full potential in a violence-free, gender-responsive and inclusive society.</td>
</tr>
<tr>
<td>Africa regional programme</td>
<td>The programme supported the development of the first Regional Action Plan for Africa on ending VAWG as well as regional assessment on the status of enforcement of ending VAWG laws and policies.</td>
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<tr>
<td>Countries</td>
<td>Adoption of new laws/policies or of amendments of existing laws/policies</td>
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<tr>
<td>Latin America regional programme</td>
<td>Together with MESECVI, the Follow-up Mechanism to the Belém do Pará Convention, the programme promoted the InterAmerican Model Law to Prevent, Punish and Eradicate the Violent Death of Women for Reasons of Gender and the Latin American Model Protocol for the Investigation of Violent Deaths of Women for Gender Reasons.</td>
</tr>
</tbody>
</table>
## Annex IV – Spotlight Initiative main contributions in pillar 5

<table>
<thead>
<tr>
<th>Countries</th>
<th>Main activities/results in pillar 5</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Argentina</strong></td>
<td>Support to the implementation of the Integrated system for gender based violence cases <em>(Sistema Integrado de Casos de Violencia por Motivos de Género)</em>. In 2022 it was still work in progress. &lt;br&gt;Support to the National survey on the prevalence and incidence of gender based violence <em>(Encuesta Nacional de Prevalencia e Incidencia de la Violencia basada en género)</em> published in 2022.</td>
</tr>
<tr>
<td><strong>Ecuador</strong></td>
<td>No concrete results reported in 2021.</td>
</tr>
<tr>
<td><strong>El Salvador</strong></td>
<td>In cooperation with the project Infosegura, financed by USAID, contribution to the publication of the reports by the Ministry of Justice of the 2020 and first semester 2021 report on violence against women.</td>
</tr>
<tr>
<td><strong>Honduras</strong></td>
<td>In cooperation with the project Infosegura, financed by USAID, contribution to the design of a new VAWG index. No results yet available in 2022.</td>
</tr>
<tr>
<td><strong>Liberia</strong></td>
<td>Standardization of the Gender Based Violence Information Management System (GBV-IMS) tools in 2021. &lt;br&gt;Implementation of the GBV-IMS Information-Sharing Protocol, disaggregated by age, sex, and demographics in 2021.</td>
</tr>
<tr>
<td><strong>Malawi</strong></td>
<td>Support to real-time digital collection of the data and transmission to the national observatory hub for easy monitoring of incidence of VAWG cases in the piloted six districts. &lt;br&gt;Support to the development of a digitised Judiciary Case Management System.</td>
</tr>
<tr>
<td><strong>Mali</strong></td>
<td>Support to the establishment of the National Gender Based Violence Database in Mali. &lt;br&gt;Support to the production of the statistical bulletin 2021.</td>
</tr>
<tr>
<td><strong>Mozambique</strong></td>
<td>Contribution to the development of the gender-based violence information management system InfoViolencia. As of 2022 the system is still at pilot stage and not fully operational. &lt;br&gt;Support to the digital migration of the Justice sector to expedite criminal investigation processes.</td>
</tr>
<tr>
<td>Countries</td>
<td>Main activities/results in pillar 5</td>
</tr>
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<tr>
<td>Niger</td>
<td>Support to the national survey on the scope and determinants of gender-based violence conducted to generate updated and reliable data on GBV in Niger.</td>
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<td>Nigeria</td>
<td>Support to the finalisation of the national gender-based violence barometer developed by the Spotlight Initiative which measures the success of government commitments at the local, state, and national levels.</td>
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<td>Support to the finalisation of the ReportGBV, which is the National Gender-Based Violence dashboard of the Federal Ministry of Women Affairs to report on violence against women and girls in Nigeria.</td>
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<tr>
<td>Uganda</td>
<td>Support to the Uganda Bureau of Statistics to supplement the national gender-based violence database, by conducting the 2021 national VAWG and Violence in family survey.</td>
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<td>Support to several studies such as the “Quality Assessment of Existing GBV HP MIS Report” and the “Data Quality Assessment of Existing GBV HP Tools, Processes and Data Management Systems”.</td>
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<td>Zimbabwe</td>
<td>Zimbabwe has been selected as one of the pilot countries for the development of a gender-based violence information management system (GBV-IMS) outside of a humanitarian context and the Spotlight Initiative supported the start of the pilot in 2021. As of 2022, the GBV-IMS was not in place yet.</td>
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<td>Africa regional programme</td>
<td>Strengthening of the African Union Commission regional data and research gender observatory and scorecard platform.</td>
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<td>Organising of continental coordination platform for Spotlight Initiative country programmes.</td>
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<tr>
<td>Latin America regional programme</td>
<td>Together with the National Council of Justice of Brazil, the programme designed an artificial intelligence tool for justice operators to support the analysis of female homicides.</td>
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Abbreviations

CSO: Civil society organisation

DG ECHO: Directorate-General for European Civil Protection and Humanitarian Aid Operations

DG INTPA: Directorate-General for International Partnerships

EDF: European Development Fund

FGM: Female genital mutilation

MPTFO: Multi Partner Trust Fund Office

OSC: Operational steering committee

SDG: Sustainable Development Goal

SGBV: Sexual Gender Based Violence

UNDP: United Nations Development Programme

UNESCO: United Nations Educational, Scientific and Cultural Organisation

UNFPA: United Nations Population Fund


UNWOMEN: United Nations Entity for Gender Equality and the Empowerment of Women

VAWG: Violence against women and girls
Glossary

**Cost-effectiveness:** The achievement of intended outcomes in relation to costs.

**Delegation agreement:** An agreement concluded with individuals or entities, in certain policy areas, for the implementation of EU funds under indirect management.

**Direct management:** Management of an EU fund or programme by the Commission alone, as opposed to shared management or indirect management.

**EU trust funds:** EU-administered fund that pools money from multiple sources to finance the international response to an emergency or ongoing crisis, generally in the developing world.

**Impact:** Wider long-term consequences of a completed project or programme, such as socio-economic benefits for the population as a whole.

**Outcomes:** The institutional and behavioural changes in development conditions that occur between the completion of outputs and the achievement of impact. They are the intended or achieved effects of an intervention’s outputs, requiring the collective effort of partners.

**Outputs:** The changes in skills or abilities, or the availability of new products and services that result from the completion of activities within a development intervention.

**Pillar assessment:** Commission assessment of the rules and procedures applied under indirect management to ensure the EU’s financial interests are protected to the same level as under direct management.
Replies of the Commission and the European External Action Service


Timeline

Audit team

The ECA’s special reports set out the results of its audits of EU policies and programmes, or of management-related topics from specific budgetary areas. The ECA selects and designs these audit tasks to be of maximum impact by considering the risks to performance or compliance, the level of income or spending involved, forthcoming developments and political and public interest.

This performance audit was carried out by Audit Chamber III External action, security and justice, headed by ECA Member Bettina Jakobsen. The audit was led by ECA Member Bettina Jakobsen, supported by Katja Mattfolk, Head of Private Office and Aino Rantanen, Private Office Attaché; Michael Bain, Principal Manager; Paolo Rexha, Head of Task; Kim Hublé, Stéphane Gilson, Auditors. Michael Pyper provided linguistic support.
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In 2017, the EU launched the Spotlight Initiative in global partnership with the UN to ensure that all women and girls live free from violence and harmful practices.

Our audit assessed whether the Spotlight Initiative has been an efficient and effective way for the Commission to address violence against women and girls. We found that the initiative has achieved outputs, but it is difficult to assess to which extent it achieved its intended results. We also identified room for greater efficiency and better value for money.

We recommend that when funding future development initiatives, the Commission carry out a thorough comparison of implementation options and their costs, increase the proportion of funding reaching final beneficiaries and incorporate lessons learnt into actions building on the Spotlight Initiative.

ECA special report pursuant to Article 287(4), second subparagraph, TFEU.