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GENDER MAINSTREAMING IN ACTION? THE SCOTTISH STRUCTURAL AND INVESTMENT FUNDING PROGRAM 2014-2020

¿SE INCORPORA LA PERSPECTIVA DE GÉNERO EN EL PROGRAMA DE FONDOS ESTRUCTURALES Y DE INVERSIÓN EUROPEOS EN ESCOCIA 2014-2020?

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Abstract

Since its inception, the European Union (EU) has been at the forefront of the promotion of gender equality. A key feature of the EUs approach to gender equality was the development and promotion of Gender Mainstreaming (GM) as an innovative approach to achieving gender equality. GM has been used as an approach to integrate gender into programme formulation, design, implementation, monitoring and evaluation across the EU policy programmes, including the European Structural and Investment Funds (ESIF), which plays a key role for both the inclusion and promotion of the contributions of women in economic development.

GM is a well-researched gender equality strategy, however there is little consensus on its effectiveness and its ability to transform the policy paradigm and attempts to operationalise GM have been limited. Despite a large body of academic literature, there is limited recent research which links GM and the ESIF, specifically at a local level. Therefore, this article aims to do that by considering whether GM as part of regional development policy can be utilised as a tool for delivering transformative changes. Scotland's approach to GM within the ESIF is analysed utilising process tracing and semi-structured interviews with ESIF stakeholders in Scotland. Key findings are outlined for the 2014-2020 funding period at the national and project level.

Keywords: Gender Mainstreaming; Gender; Regional Policy; Scotland; European Union.

Resumen

Desde su inicio, la Unión Europea (UE) ha estado a la vanguardia de la promoción de la igualdad de género. Una característica clave del enfoque de la UE sobre la igualdad de género fue el desarrollo y la promoción de la integración de la Perspectiva de Género (PG) como un enfoque innovador para lograr la igualdad de género. La PG se ha utilizado como un enfoque para integrar el género en la formulación, diseño, implementación, monitoreo y evaluación de programas de la agenda política de la UE, incluidos los Fondos Estructurales y de Inversión Europeos (FEIE) que desempeñan un papel clave tanto para la inclusión como para promover las contribuciones de mujeres en el desarrollo económico.

La PG es una estrategia de igualdad de género ampliamente investigada, sin embargo, hay poco consenso sobre su efectividad y su capacidad para transformar el paradigma de decisiones políticas. Además, los intentos de operacionalizar la PG han sido limitados. A pesar de una gran cantidad de literatura académica, existe una limitación de investigaciones recientes que vinculan la PG y FEIE, específicamente a nivel local. Por lo tanto, este artículo tiene como objetivo analizar si la PG integrada en la política de desarrollo regional se puede utilizar como una herramienta para generar cambios transformadores. La experiencia en Escocia sobre los GM dentro del FEIE se analiza utilizando el seguimiento del proceso y entrevistas semiestructuradas con las partes interesadas del FEIE en Escocia. Los resultados clave se describen para el periodo de financiación 2014-2020 a nivel nacional y de proyecto.

Palabras clave: perspectiva de género; género; política regional; Escocia; Unión Europea.

1. INTRODUCTION

The concept of gender mainstreaming (GM) was formally adopted by the European Union (EU) as part of the Treaty of Amsterdam in 1997 (Guerrina 42). At the time, it offered the potential to achieve greater gender equality in the labour market (Walby 329).

GM has been defined as;

the promotion of gender equality through its systematic integration into all systems and structures, into all policies, processes and procedures, into organisations and its culture, into ways of seeing and doing (Rees, «Reflections» 560).

The idea behind GM was to ensure that those responsible for designing policies are aware of any potential gendered impacts by incorporating gender equality consideration into both policy development, implementation and evaluation. The adoption of GM implied that it was no longer acceptable to assume that additional resources targeted at stimulating economic development and growth benefited men and women equally, in other words, that the intervention was gender neutral (Campbell, Fitzgerald, and McSorley 141). Unintended consequences and/or effects that could undermine or prevent the achievement of policy aims for either women or men can be identified, avoided or monitored from the earliest stages (McKay and Gillespie 191-212). Therefore, in order to maximise the economic impact of policies designed to stimulate regional development they needed to become more «gender aware». GM is attempting to bring gender equality considerations to the mainstream policy development and delivery process. This approach is now central to the EU's policy for promoting gender equality and has been a key feature of its regional policy since 2000.

A wealth of research has been undertaken on GM, however there is little consensus on its effectiveness. While there is recognition that there is widespread commitment to gender equality policies within the EU, there are questions as to how successful GM has been in delivering transformative changes in the policy process (Cavaghan and O'Dwyer 98). Bacchi («The Mageeq Project» 222) argues that the disappointment of GM implementation is due to the converging ways that inequality has been «discursively constructed» into policy frames. The concept of gender equality and the gendered dimensions

across public policy are not well, or consistently, understood and therefore the policy responses to gender inequality have not resulted in the transformational policy objectives of gender mainstreaming being realised. Rather, the framing of the solution aims to fit women into the «status quo» effectively the «add women and stir» approach (Harding 15).

This article analyses the effectiveness of GM within the Scottish ESIF Programme 2014-2020. It draws on both discursive policy analysis (Bacchi and Goodwin 36) and feminist economics. Bacchi and Goodwin bring a useful perspective on policy analysis as they consider «what the problem is represented to be», therefore considering what are the underlying assumption and socially constructed knowledge upon which policies are made and understood. This method of policy analysis fits well with feminist economic underpinnings that consider inequality a consequence of the action of social actors. Feminist economists have long argued against that the notion of «rational economic man» (REM) upon which mainstream economics is based (Beneria, Berik, and Floro 53). Instead recognising the social construction of people and their preferences which may shape / limit their «choices», particularly for women. These tend to be ignored in mainstream economic policy making which considers efficiency in the market a measure of success rather than equity.

This research comprised discursive analysis of ESIF Programme documentation, regulations, application forms and guidance at the EU level, Scottish Government and project levels. The analysis identifies «what the problem is represented to be» as well as levels of commitment to GM. This was combined with semi-structured interviews of twenty-five «street level» civil servants and project managers to further understand the level of commitment and knowledge of GM. The interviews were analysed using thematic analysis and organised by predetermined themes and then allowing emergent themes to come to the fore.

Implementation of GM, which is a «fuzzy» concept, at the project level is an important process to understand and evaluate, as this is where the written intentions of a policy can come to fruition or fall away. The combination of both policy analysis and qualitative data allows for a deeper understanding of all the levels of the GM process. It highlights any slippages between the written policy, at supranational, national and local levels, and implementation

and therefore any resulting consequences for the ability of GM to be transformational. It is important to understand the way that gender is conceptualised and interpreted through the layers of governance within ESIF and for the way in which GM has been operationalised at a local level. This paper analyses the process in Scotland from written policy to local implementation and therefore provides the platform for creating a more effective and transformational way to operationalise GM at a local level.

However, before discussing the research findings, the following section considers some of the conceptual problems with defining and implementing GM and the processes which the EU has developed for its gender equality strategy over time.

2. CONCEPTUALISATION OF GM IN THE EU

The EU faces many challenges in advancing gender equality, among them, the variances in understanding of what constitutes gender equality (Kantola 56) and the relevance of gender relations in public policy, including economic development. The lack of consensus on the meaning of gender equality creates conflict over what is entailed in GM policies and their implementation (Bustelo and Verloo 4). Lombardo and Meier (152) describe the EU definition of GM as an «empty signifier»:

the (re)organization, improvement, development and evaluation of policy processes so that a gender equality perspective is incorporated in all policies at all levels and at all stages, by the actors normally involved in policy-making.

According to Verloo (118), this has led to downplaying the goals of gender equality with the assumption that everyone knows and agrees on what the goals are. Furthermore, this confusion of the meaning of GM resulted in the inconsistent and uneven implementation and political will across the member states. Previous research has indicated that this inconsistency has led to the goals of gender equality being interpreted as equal opportunities or alternatively diversity. Policies are inherently political therefore the way in which gender equality is defined as a policy problem, relates to the political environment of member states and therefore has an impact on the way solutions are framed (Bacchi, *Women, Policy and Politics* 199).

GM goes beyond simply changing the disadvantaged position of women and attempts to change the whole policy system and institutions which create and implement them. GM is a strategy for achieving transformative change in behaviour, of both men and women as well as institutions, which ultimately is expected to deliver gender equality. However, GM is a contestable strategy and its ability to transform structural inequalities has been debated since its introduction. According to Walby (466), GM involves two different structures, «gender equality» and the «mainstream». The new gender norms and policy objectives that are sought by GM have to fight with the already well established and routed gender norms within institutions. This has resulted in gender norms persisting in the policy process and therefore in the implementation of economic policies including regional policy.

Rees (*Mainstreaming Equality* 46) argued that for true gender equality there must be transformational change which challenges the structures of existing gender relations. The transformational goal for gender equality would change the behaviours and standards of everyone by taking into consideration the associations of masculinity and femininity within institutions (Walby 323). However, Pollack and Hafner-Burton (452) concluded that the EU had adopted a more integrationist approach to GM by framing and selling the policy as a means to an end rather than challenging the dominant «mainstream» ends of the market. Beyond the goals of implementation of GM there is also the problem with the conceptualisation of gender.

Within the EU the grounds for legal action due to discrimination have become more diverse including ethnicity, disability, faith and sexual orientation. This has implications for the practice of GM (Walby 322; Woodward 297) as this change of context within the EU has led to a shift from gender equality to a more diverse equality framework. There are concerns that this shift of focus from «gender» to diversity can dilute efforts to GM (Walby 322) or can potentially create a level of competition between the different inequalities (Woodward 294). There is an assumption that all inequalities are homogenous and can be approached by the same policy mechanisms. As Kantola (134) argues, the use of only sex disaggregated data to measure the success of GM within the EU suggests that gender has been interpreted as a noun which assumes «fixity» rather than a fluid social construct (Eveline and Bacchi 501). The inclusion of «gender» in GM was supposed to be a

move away from only counting women and men however, the bureaucratic requirements for data strips the political nature of GM and instead reduces it to measuring gaps as opposed to addressing the deep rooted structures reproducing inequality. As Kantola (134) argues the use of statistics to measure the success of GM within the EU leads to the failure to recognise the interplay of gender, race and other forms of discrimination.

In the early period of GM, Beveridge, Nott and Stephen (392) and Wittman (53) described two approaches to implementing GM. The first is the expert-bureaucratic model where GM is carried out by specialists who could be gender experts with high levels of understanding of gender relations. This approach is highly dependent on technocratic tools such as gender budgeting and audits which fit well with normal processes within organisations therefore making GM an easier process to implement (Wittman 55). However, that is detrimental to the overall goal of GM as it can lead to a focus on *doing* GM without dealing with the underlying structural issues of gender inequality. The danger is that it becomes a tick box exercise which will not lead to positive deep routed change within an organisation. The second approach is the participatory-democratic model where there are a range of individuals and organisations that are involved in GM implementation. This approach promotes access to the policy-making process as well as giving more people a voice (Wittman 56). This model is more conducive to the social justice aims of GM by placing importance on the many tools used for mainstreaming but also in recognising the importance of a democratic and deliberative continuing throughout the implementation.

The EU has adopted the expert-bureaucratic approach (Kantola 133; Walby 332), where GM addresses gender equality through already existing frameworks and fails to consider the voices of disadvantaged groups through consultation with civil society organisations. This is evident in the multiple handbooks, checklists and assessment guidance for the implementation of GM, which fail to challenge the dominant policy paradigm.

Furthermore, since the financial crisis of 2008, which hit the EU member states hard and the subsequent austerity measures, the status of gender equality as a policy objective has been downgraded (Kantola and Lombardo 74). This has had consequences for the effectiveness of GM. Bettio *et al.* (205) found that «gender mainstreaming has been sidestepped both at the policy

design and the implementation stage» in the response to the aftermath of the financial crisis of 2008. For example, the Europe 2020 strategy moved towards a gender-neutral approach with no specific targets for female employment or specific focus on GM (Jacquot 33). In a further weakening of policy capacity, the institutional arrangements for advancing gender knowledge and gender analysis were diminished, as the Gender Equality Unit was transferred from DG Employment to DG Justice which narrowed their focus to anti-discrimination (Hubert and Stratigaki 28).

Further evidence of the retreat from gender quality can be found in the way the EU framed the regulation for the operation of Structural & Investment Funds in the period 2014-20 which the following section explores in more detail.

3. GENDER EQUALITY IN THE EUROPEAN STRUCTURAL & INVESTMENT FUNDS 2014-2020 PROGRAMME PERIOD

Gender equality is a horizontal theme across all the European Structural and Investment Funds (ESIF) including the European Regional Development Fund (ERDF) and the European Social Fund (ESF). Therefore, GM is a key principal and is specifically addressed within the ESF. Despite this, the EU failed to designate gender equality as a thematic objective in the 2014-20 period, which has reduced the level of importance of integrating gender into Operational Programmes, planning, evaluation or implementation (Samek Lodovici, Pesce and Loi 11).

Gender equality as a horizontal theme should be considered across all funds, Article 7 of the Common Regulation (EU) No 1303/2013 states:

The Member States and the Commission shall ensure that equality between men and women and the integration of gender perspective are taken into account and promoted throughout the preparation and implementation of programmes, including in relation to monitoring, reporting and evaluation.

Within ESF regulations there is a mandatory requirement to promote gender equality and to address equal opportunities and anti-discrimination (Samek Lodvici, Pesce and Loi 27). This makes ESF the largest source of targeted funding for gender equality measures within the ESIF. However, in the 2007-2013 programme period, only 3.7% of the total ESF funding on average per

Member State was allocated to gender equality actions (Samek Lodvici, Pesce and Loi 30).

ERDF regulations have no specific reference to gender equality, this exclusion suggests that projects not directly related to women and equality, such as infrastructure, are gender neutral. This is a sign of «strategic silencing» (Cavaghan and O'Dwyer 96) within the ERDF where economic activities predominantly performed by women, as producers and carers in the home, are excluded from economic development. Instead, there is a focus on investing in physical infrastructure, in order to generate economic and employment growth (De Henau *et al* 3127). The exclusion of the requirement for gender data in ERDF has allowed for the prioritisation of «men's jobs» in construction and physical infrastructure rather than in social infrastructure. Social infrastructure refers to education, care and health services (De Henau *et al* 31).

Women dominate the care sector, therefore investment in social infrastructure such as child and long-term care services, would create more employment for women as well as physical services for care. This reflects the neoclassical economic bias that what is viewed as traditionally male employment is more important, as men are viewed as the breadwinner, despite the increasingly changing structures of family units. This highlights what is valued in the economy where neoclassical economics considers «work» as something that is motivated by money and not care therefore only valuing non-caring roles (Folbre *et al.* 12). Furthermore, according to UN System of National Accounting, expenditure on social infrastructure is categorised as consumption as opposed to physical infrastructure which is counted as investment. Therefore, social infrastructure is believed to be a burden on the public finances rather than considering the economic benefits, in terms of creating employment, and increasing social welfare (Elson and Seth 55; De Henau *et al* 10).

During the current funding period, the ESIF have been utilised to deliver the Europe 2020 strategy, which as has already been mentioned, no longer consists of a specific target for women's employment rate. According to Samek Lodvici, Pesce and Loi (15) in their study of selected member states Operational Programmes, including the UK, the lack of inclusion of gender equality and evaluation means that GM is likely to fail at the EU

level, especially when there are difficult economic conditions. Furthermore, the inclusion of the dual approach to gender equality in Member States Operational Programmes is voluntary, therefore allowing the Member States to selectively dismiss the gender perspective as a priority. ERDF funds specifically are «thematically concentrated» on the objectives shown in Table 1, all of which have a gendered impact.

Table 1. Thematic Objective Concentration

Thematic Objective Number	Thematic Objective Title
1	Strengthening research, technological development and innovation
2	Enhancing access to, and use and quality of information and communication technologies
4	Supporting the shift towards a low-carbon economy in all sectors)

As discussed in the previous section, since the 2008 economic crisis there has been a notable downgrading of gender equality policies and interventions. Rubery (580) argues that this has revealed that the «EU are an unreliable source of support for gender equality» and that the EU have not been a solution to gender equality rather they have contributed to greater gender inequality through the promotion of austerity measures and the unrelenting reliance on neoliberal economic policies. Furthermore, the EU has increasingly downplayed measures to influence member states commitment to gender equality as a priority. This extends into the Multiannual Financial Framework for the upcoming programme period (2021-2027), which no longer contains GM as a horizontal principal and gender budgeting is not applied (Klatzer and Schlager 54). The EUs «integration» approach has failed to challenge the neoliberal norms and therefore the transformational goals of GM have failed. This failing strategy therefore is likely to have filtered down to the national and local levels and potentially become even further diluted.

4. SCOTTISH STRUCTURAL FUNDING PROGRAM

During the 2014-2020 funding period, the Structural Funds were worth €941million to Scotland which is split between ERDF (approx. €476 million) and ESF (€465 million) (Scottish Government, *Structural funds 2014-20*). In this period, Scotland has two programme areas – the Highlands and Islands (H&I) and the rest of the country the Lowlands and Uplands (LUPS). The H&I was designated a Transition Region as it had a GDP between 75% and 90% of the EU average (Thom 14).

In Scotland, the 2014-2020 period saw the complete centralisation of the management of the funding as the European Structural Funds Division (ESFD), dissolving the Programme Management Executives (PMEs) and bringing the process in-house (Keith 1) which allowed the Scottish Government to have full control of the distribution of the funds. Moving away from the previous system which was considered a «model» by the European Commission toward a more «top down» approach (Davies *et al* 18). This may have been due to the reduction in funding allocated to Scotland and the requirement to reduce administration costs of PMES which were estimated to be £30.89 million in the 2000-2006 period (Davies *et al.* 38). The approach adopted by the Scottish Government was intended to bring together national objectives which would help meet the Europe 2020 strategy in a move towards a more «subsumed» system which was thought to be more cost efficient and align EU funds with domestic priorities (Davies *et al.* 16).

The Scottish Government distribute ESIF through Lead Partners who provide the match funding for projects which they either deliver themselves or through Delivering Partners. Lead Partners are government policy directorates, agencies and local authorities who are judged to have the capacity and capabilities to deliver the Strategic Interventions (SI) on behalf of the Scottish Government (Thom and Kenyon 24). SIs are «large scale funding allocations (minimum of €15 million), structured around 13 specific themes defined as ‘programmes of work of significant scale and defined scope» (Dozhdeva, Mendez, and Bachtler 17) including employability and business competitiveness. However, this approach potentially excludes small third sector organisations from accessing the funds, which therefore results in larger organisations and local authorities consuming most of the funds as demonstrated in Figure

1 showing the distribution of the funds across Scotland. Furthermore, despite trying to reduce the administrative costs from previous funding periods the Scottish Government retain 34% of the funds internally, which amounts to approximately £320 million separated between administrative costs and internally managed projects.

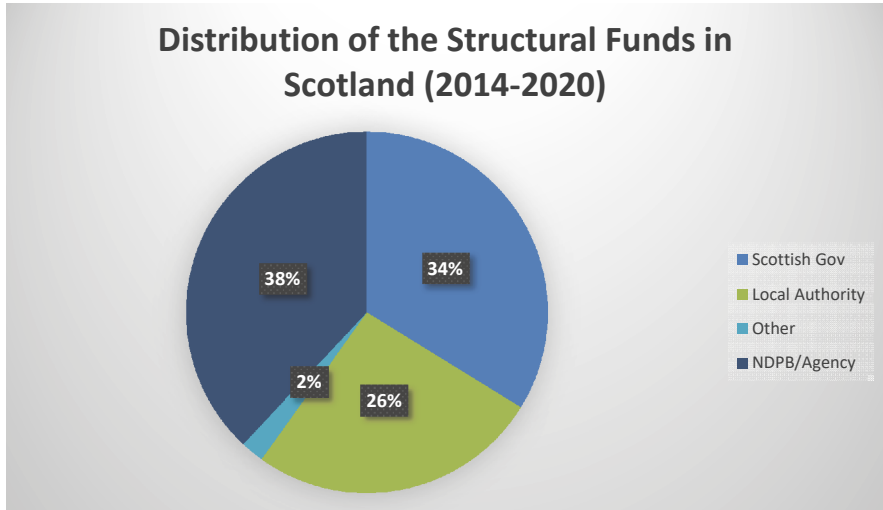


Figure 1. Distribution of Structural Funds across Scotland (2014-2020) (Source: Thom and Kenyon, 2018).

The Scottish Government has made a commitment to ensure that equality is considered in all their policies, both as an aspiration and a legal requirement (Scottish Government, *European Structural*). Indeed, the Scottish Government's Economic Strategy (launched in 2007 and updated 2015) is based around the twin goals of increasing competitiveness and tackling inequality in order to deliver sustainable economic growth (Scottish Government, *Scotland's Economic Strategy* 7). GM was stated as part of the strategy within the Scottish Operational Programmes for ERDF and ESF:

«Gender mainstreaming will be incorporated not only throughout the lifetime of the project but also the planning, preparation, implementation, monitoring and evaluation stage» (Scottish Government, *Operational Programme* 200).

Furthermore, ESF and ERDF project applications are required to state their commitment and plans to tackle the horizontal themes of; sustainable development, equal opportunities and non-discrimination and equality between men and women. Although Scotland has continued to have a commitment to gender mainstreaming, there is evident resistance in committing fully to the strategy as compared with the Welsh Government who have a specific gender mainstreaming horizontal theme. Furthermore, they have a «Cross-cutting theme team» who are there to offer guidance through the life cycle of funded projects (Welsh Government 14). The Scottish Government do not have any horizontal theme experts; projects are allocated a generalist contact person for advice on all matters of the project. This highlights the difference in interpretation of the EU regulations as well as the difference in political will. The Scottish Government has interpreted GM as equalities mainstreaming which has resulted in equal opportunities policies. These policies rely on the assumptions of an individualistic nature and assumes that individuals can influence their own opportunities rather than challenge cultural norms and stereotypes (Bacchi and Eveline 41).

5. GENDER AND THE ESIF IN SCOTLAND

5.1 Analysis of gender in programme documentation

Written policies are open to interpretation and dilution particularly as they travel through layers of governance. Therefore, to understand the way in which gender equality has been interpreted and framed through these layers is an important step to understanding the extent to which gender equality strategies such as GM can be successfully implemented at a local level. Therefore, this research analysed the documents in Figure 2 to identify the application of GM through the ESIF policy.

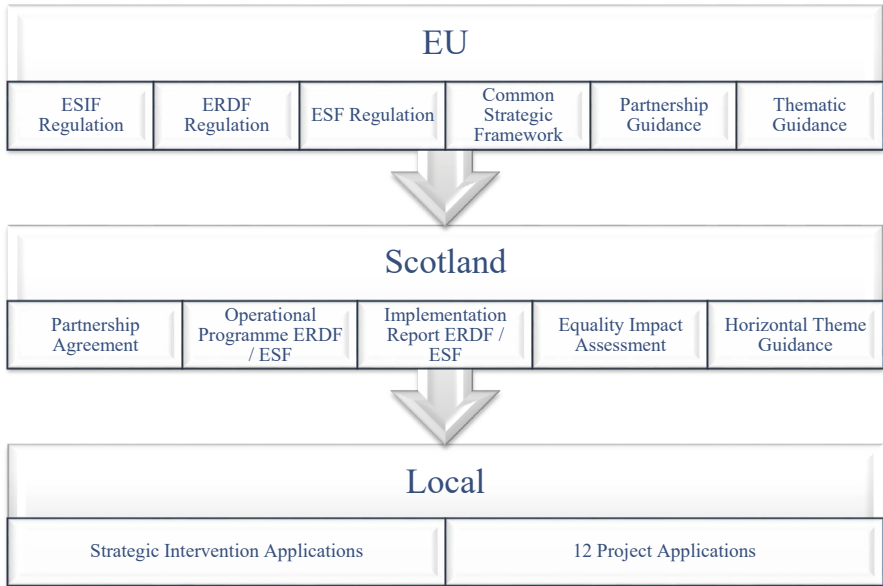


Figure 2. Programme Documentary Analysis.

It is clear from analysis of the 2014-2020 Scottish programme documentation that there has been some confusion regarding the horizontal themes. The Scottish Government set out the three themes of: sustainable development, equal opportunities and non-discrimination, and equality between men and women, highlighting their additional commitment to gender equality. However, the original project application forms to Lead Partners and equality impact assessment by the Scottish Government (*Equality Impact*) stated the themes as: Equality, Social Inclusion and Environmental Sustainability, thereby omitting the specific commitment to equality between men and women. Consequently, projects were not asked about their commitment to equality between men and women and furthermore their application was not assessed on the correct horizontal themes. This is despite the ex-ante evaluation concluding that the gender perspective had been evident within both the ERDF and ESF Operational Programmes and the Equality Impact

Assessment (Hall Aitken 23). The ERDF Operational Programme suggests that the application forms have been updated to include questions regarding gender stereotyping and other questions directly linked to the horizontal themes. However, when analysing the project application forms, there is no indication that this is the case. This discrepancy suggests only a limited effort to commit seriously to the themes beyond superficial policy statements.

The recognition of the importance of significant gender analysis is evident throughout the Scottish Government Operational Programmes however this is not carried through to project applications and therefore has consequences for the implementation of GM at a local level. This may be due to the framing of the problem with the focus on equality mainstreaming rather than specifically gender. There is also little evidence of positive outcomes from the inclusion of GM within projects. The 2017 ESF Annual Implementation Report shows a significantly higher number of men benefiting from the projects than women in most of the categories as shown in Figure 3.

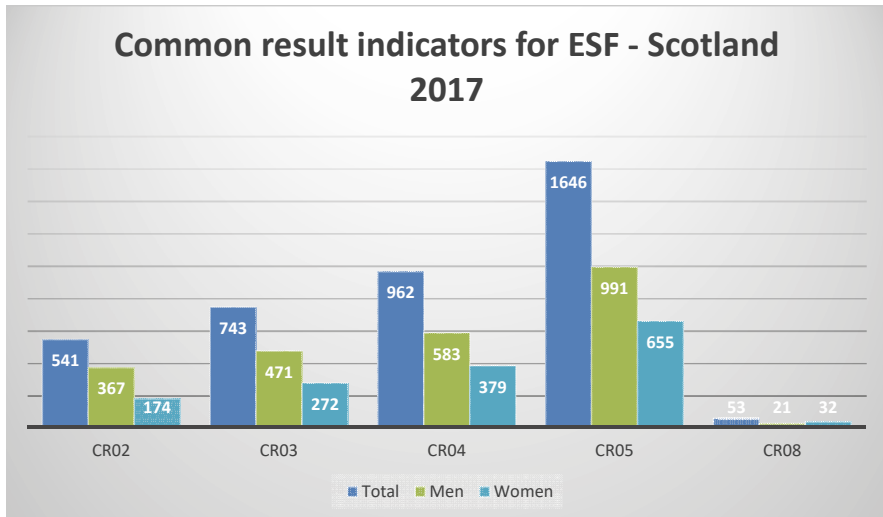


Figure 3. Common Indicators for ESF Scotland 2017.

Table 1. Common Indicator ID Key

ID	Indicator	Category of Region
CR02	participants in education/training upon leaving	More Developed
CR03	participants gaining a qualification upon leaving	More Developed
CR04	participants in employment, including self-employment, upon leaving	More Developed
CR05	disadvantaged participants engaged in job searching, education/ training, gaining a qualification, or in employment, including self-employment, upon leaving	More Developed
CR08	participants above 54 years of age in employment, including self-employment, six months after leaving	More Developed

Source: Scottish Government Annual and Final Implementation Report.

This imbalance is also evident within the evaluation of the Youth Employment Initiative (YEI), where 4,669 men engaged compared with 3,255 women between 2015 and 2018 (Economic and Social Development 47). The YEI states that the aim of the programme is to put young people into «quality» employment however the only evaluation is on quantitative outcomes and there appears to be no way of measuring quality and therefore ensuring there is no entrenchment of occupational segregation by sex.

Furthermore, there is no specific commentary on the progress in promoting gender equality within the ESF or ERDF Annual Implementation Reports. Individual evaluations for mainstreaming environmental sustainability and the Youth Employment Initiative are available, however there is no such evaluation for equality between men and women or GM. This indicates the *strong* commitment from the Scottish Government may be mere rhetoric and that there is a gap between the written intent of the ESIF and the actual implementation at a national and local level.

5.2 Interview Findings

Twenty-five key stakeholders from the 2014-2020 Scottish Structural Funding Program, including the Scottish Government, local authorities, other Lead Partners and delivering agents, were interviewed (Table 3). The interviews

were structured around questions designed to establish their understanding of GM and the inclusion of GM within the project application, monitoring and evaluation stages.

Table 3. Interview Participants

Organisation	Region	Organisation	Funding
Barnardos	National	Delivering agent	ESF
Clackmannanshire Council	LUPS	Local Authority	ESF
Comhairle nan Eilean Siar	H&I	Local Authority	ERDF
East Lothian Council	LUPS	Local Authority	ESF
Engender	National	Feminist Advocacy Organisation	N/A
Fife Council	LUPS	Local Authority	ESF
Highland and Island PME	H&I	Programme Management Executive (previous funding periods)	Both
Highland Council	H&I	Local Authority	Both
Highland and Island Enterprise	H&I	Lead Partner	Both
National Lottery	National	Lead Partner	ESF
North Ayrshire Council	LUPS	Local Authority	ERDF
North Lanarkshire Council	LUPS	Local Authority	ESF
Scottish Enterprise	National	Lead Partner	ERDF
Scottish Funding Council	National	Lead Partner	ESF
Scottish Government (Lead Partner)	National	Lead Partner	ESF
Scottish Government (Managing Authority)	National	Managing Authority	Both
Scottish Natural Heritage	National	Lead Partner	ERDF
SCVO	National	Delivering agent	ESF
Shetland Council	H&I	Local Authority	ESF
Skills Development Scotland	National	Lead Partner	ESF
South Ayrshire Council	LUPS	Local Authority	ESF
Stirling Council	LUPS	Local Authority	ESF
Strathclyde Eu Partnership	LUPS	Programme Management Executive (previous funding periods)	Both
University of the Highlands and Islands	H&I	Delivering agent	ESF
Zero Waste Scotland	National	Lead Partner	Both

5.2.1 Understanding of GM

The interviews revealed that there was little understanding of GM at either the national or local level with most of the participants admitting that they had never heard of the term. Their understanding is framed as equal opportunities and non-discrimination, demonstrated in the quote below, which is consistent with the message conveyed by both the Scottish Government and the EU documentation.

My take on that would be that it is just about there is no gender bias in any employment sectors, no gender bias in recruitment, no gender bias in job roles or anything like that. It's just like...it's just not an issue. Here's the job, here's the job role, it doesn't matter who you are, if you have the competency and the ability to do that job then you should get that job (Barnardos).

From a feminist economics perspective, the underlying assumptions of neo-liberal economic policies and equal opportunities are that individuals can make free rational choices and equal opportunities in a market economy creates competition for those opportunities (Nelson 31). Furthermore, Bacchi's framework, with its reminder of the silences and assumptions inherent in policy making, further explains how dominant economic models fail to consider the constraints on women and their ability to access the opportunities. The equal opportunities approach implicitly assumes that women need to be integrated into existing gender and power structures rather than challenge the gender norms that create and reinforce those structures (Eveline and Bacchi 113).

Furthermore, when asked about gender specifically, there was the tendency to refer to all the protected characteristics which is consistent with the concerns about the dilution of gender equality. Only one stakeholder was aware that GM involved considering all project stages from a gender perspective and that policies are not gender neutral. While this points to the level of discretion that «street level» bureaucrats have in the implementation of policy which Lipsky describes (13-26), it illustrates a particular concern that implementers can potentially bend and stretch the policy to fit existing structures (Lombardo, Meier and Verloo). In the context of the fluidity of gender mainstreaming and its reduced status as an «empty signifier», this

reveals low levels of gender knowledge in the implementation as well as in the design of ESIF programmes and funded projects.

5.2.2 Application Process

In the project application stages, there was acknowledgement of the requirement for an equality statement, however it was not specific to gender and in fact it considered all protected characteristics, race, age sex, disability, etc. When gender was addressed, it was only regarding quantitative data in ESF projects. ERDF projects were difficult to evaluate as there was a misconception that gender is not relevant as ERDF does not cover social issues. This was the response from a representative of Scottish Enterprise who control a large proportion of ERDF funding in Scotland.

The monitoring of things like 'gender mainstreaming' would be associated with the European Social Fund as opposed to the ERDF route. The funding was granted as part of a Business Competitiveness objective only.

Furthermore, some participants reported that it was a «tick box» exercise when completing the application section on equality: «sometimes you were just... it felt; like you were really just having to state the obvious. At times slightly a tick box exercise» (East Lothian Council)

Stakeholders reported that they felt they were duplicating work already done by their local authority or their gender equality «person» or team, thus indicating that gender equality policies were already institutionalised and therefore no specific action was required. According to Ferguson (386), when gender is marginalised in this way, there is no incentive for other departments to take the issue seriously, the interview data supports this argument. When there is an attempt to integrate gender or do any gender analysis, the ESIF operational teams overly rely on the «experts» out with their department. There was no attempt to ensure gender knowledge and capacity building was present within the team. This approach will not ensure transformative changes in the existing programme structures and limits the ability of GM as strategy. Capacity building in gender knowledge and awareness are essential for GM to be successful as suggested by Eveline and Bacchi. Very few of the projects had considered gender impacts at the design stage; most were content with the idea that their services were open to all. When asked about the

possibility of barriers faced by men and women accessing their services, there was some recognition that providing childcare was a potential enabler for women. However, there was no analysis of the current economic differences between men and women or the identification of potential issues women may face in accessing services. This is in direct contrast to the expectations of Lead Partners outlined in both the ERDF and ESF Operational Programmes. Despite this, the interviewees reported that there was no scrutiny of this at a national level.

All the participants, including the Scottish Government, acknowledged that there was no guidance available for Phase 1 of the application or implementation stage, in 2016 for delivery until 2018, and that there was no point of contact for gender specific advice. This is in direct conflict with the Common Regulation (EU) No 1303/2013 (347) ex-ante conditionality requirement which states the requirement for «provision of advice on gender equality in ESI Fund-related activities» and with the requirements outlined in the Operational Programme. Participants expressed concern on the lack of guidance for the whole programme and that the rules changed throughout the Phase 1 period. This is especially evident with the National Rules being published after the start of some of the projects, as well as the confusion with the horizontal themes, as evidenced in this interview excerpt,

So, the horizontal themes at the moment are...they have changed the terminology halfway through the programme which hasn't been particularly helpful (Scottish Natural Heritage).

Many of the participants report that they were informed of the new theme of equality between men and women during an audit in 2018. This was their first knowledge of the theme and they were being asked to report on it when they had not been informed of the change. Participants expressed the need for more guidance regarding the horizontal themes:

I don't feel actually we have a lot of guidance and it is something I have asked for and would welcome. I have also suggested that it would be good to get some knowledge and experience sharing between various Lead Partners and how their projects are actually getting on delivering and how they are finding it at a programme level to collate information and show what impact is being made (Scottish Natural Heritage).

5.2.3 Implementation and Evaluation of GM

Regarding the implementation of GM, very few participants were able to identify the way in which they had mainstreamed gender into their projects. They considered the inclusion of gender equality policies within the overall organisation as sufficient.

At the evaluation stage, only projects funded by ESF gathered data on the number of female and male participants and reported this back to the Scottish Government on an annual basis. No participants could recall any occasions when their data was scrutinised by either the Scottish Government or the European Commission. Furthermore, they acknowledged that they did not do anything meaningful with the data, mainly due to a lack of resources and other bureaucratic issues regarding the management of ESIF projects. Onerous evidence is required from participants which consumes resources within the services and resources are further stretched by the pressured environment to provide quantitative data to the Scottish Government and European Commission. This results in the loss of a gender mainstreaming approach as neither the knowledge, the data, the personnel, or the process to integrate gender analysis is sustained. As evidenced in earlier sections, gender is downgraded in times of restricted resources as reflected in work by Bettio *et al.* (205). Gender equality analysis is seen as a luxury which the organisations do not have enough resources to deliver. Bustelo (85) argues that the evaluation stages are vital for identifying this «evaporation» of gender therefore without this stage in the project life-cycle GM will fail to make transformative changes in patriarchal structures.

Many participants reported their frustration with the lack of understanding of their service users who are furthest away from the labour market. They often regard limited engagement with small outcomes to be a success with their clients however as this cannot be measured in terms of employment gained, they are not considered which shows the service as underperforming.

obviously the programme targets are very much about jobs, qualification and you know some of these folks are...by the time they leave the National Third Sector Fund Intervention are still nowhere near a qualification or a job (Skills Development Scotland).

As there are no quantitative measurable outcomes which would fit what Shanks (590) describes as the the mainstream economic «balance sheet» (590), the services are devalued, adding pressure on organisations running projects which could cause the exclusion of some people from the service. The requirement for auditing evidence is burdensome and leaves delivering agents and Lead Partners at risk of not receiving funds if they cannot demonstrate compliance. This focus on quantitative outcomes ignores the «lived effects» (Bacchi and Goodwin 23) of discrimination. This is an example of what has been left «unproblematized» (Bacchi and Goodwin 21) in the design of ESIF programme requirements, adding pressure on organisations running projects which could potentially result in the exclusion of the very people that ESF projects are designed to support. For example, the National Lottery reported that the pressure to hit target numbers meant that the management within their projects: «*were not the least bit interested in what the gender approach is... it is just strictly a numbers game*».

Lead partners attend yearly events organised by the Scottish Government to discuss the implementation of ESIF in Scotland. However, none of the stakeholders recalled having discussed the horizontal themes at these events. There is the opportunity to share good practice with the Scottish Government however these are individual cases, and as there is no scrutiny, there is no way of confirming if this is normal practice. Some participants indicated that they would appreciate the opportunity to discuss how they have integrated the horizontal themes in their projects; however, this is not available.

I have also asked several times...you know they have lead partner event which are maybe once or twice a year and I suggested several times that it would be really useful to have a session on the horizontal themes there which would give us a chance to...just to do exactly what we have been talking about. You know for the Managing Authority to give their perspective and then the maybe for some lead partners to ask question or share experience or whatever...you know I have asked for it a lot, it just not happening (Scottish Natural Heritage).

Contrary to Common Regulation (EU) No 1303/2013), there seems to be less involvement of Scottish feminist groups and civil society organisations in the planning of the Scottish Programme in 2014-2020 period than in previous programming periods. Engender, a leading feminist advocacy group stated:

We have much fewer discussions now with the Scottish Government than when, for example, the East of Scotland Partnership existed. Where there would be discussions on Structural Funds. We weren't recipients of funding, but we were brought in as gender experts to have conversations about the horizontal themes and how they worked. So, it seems that those conversations are no longer happening.

6. CONCLUSION

The EU institutions were early adopters of GM and claim to be pioneers in the promotion of gender equality. The inclusion of GM within ESIF was an important step in recognising women's contribution to the economy. However, it is evident from analysis of the EU and Scotland's approach to the implementation of GM that the transformational goals of the strategy have not materialised. This may well be because GM is fundamentally flawed (Hankivsky 647) and cannot perform the transformational role championed by its advocates. On the other hand, it could be that it has not been implemented properly, that is that it is not the concept, which is flawed, but rather the processes adopted in its implementation. The results of the Scottish case study presented here would tend to support that contention.

Policy makers in Scotland have continued to represent the problem of gender equality as women's inactivity in the labour market. However, they have done that without meaningful analysis of the structural issues which have prevented women's participation in the labour market. EU funding has not been used to address structural inequalities including the uneven allocation of caring responsibilities. This representation of the problem and the underlying mainstream economic assumptions have resulted in the solution being continually stuck within the neoliberal frame of equal opportunities and non-discrimination. This results in economic development policy, and specifically the management of the ESIF not moving beyond the «social arrangements and practices which support the status quo and maintain the position of the powerful groups» (Bacchi *The Mageeq Project* 228). Furthermore, this portrayal of the problem continues to problematize women's disadvantaged position in the economy, excluding a gendered analysis and a focus on transformation of men's experience and of gender relations, instead suggesting women remain the source of the issue and are responsible for fixing it. In

addition, this has taken place at a time when gender equality policies have been downgraded at an EU and national level.

The findings from the interviews supports the argument made by Walby (322) and Campbell, Fitzgerald and McSorley (21) that when the solutions to gender inequality are framed as equal opportunities there is dilution of the structural changes that are required to achieve gender equality and successfully implement GM. ESIF stakeholders in Scotland believe that their services are available to all with no discrimination. This understanding of the solutions to gender inequality are insufficient in dealing with the reason women are not able to access these opportunities or the societal influences which shape their *choices*. Therefore, a more transformational intersectional approach, that recognises that gender cuts across all other inequalities, is required. Furthermore, there must be more emphasis, at both national and local level, on monitoring and evaluation from a gender perspective.

If GM is to be transformational, evaluation of projects is essential as this is where the leakages of gender knowledge and commitment can be found. This article has argued that «street level» implementers in all sectors, private, public and third, have the ability to implement GM, however the infrastructure to deliver this has not been made available through the EU or Scottish Government. The lack of resources and the breakdown of gender equality infrastructure since the financial crisis has had a severe impact on the success of GM. The Scottish Government should build capacity within Lead Partners and project managers to implement GM effectively across all stages of the process, by engaging with external organisations who have adequate gender knowledge to effectively evaluate the gender impact of the projects and the programmes.

ESIF continue to be guided by burdensome quantitative outcomes resulting in projects being solely concerned with numbers and this potentially leads to a loss of project quality through a diminished focus on qualitative activity and outcomes. This bureaucratic approach (Beveridge, Notts and Stephen 392; Wittman 53) has increased pressure to hit target numbers which means that any jobs are acceptable and therefore there is a risk of exacerbating gender inequality through generating low paid unskilled and casualised labour. The approach of counting women as a unitary category has led to *doing* GM rather than challenging the structural problems that would result

in transformational gender equality (Wittman 54). Consequently, during an economic crisis, gender equality becomes a luxury rather than an essential element of sustainable economic development and this is evident in the subsequent policies of austerity and cuts in public spending. The findings from the interviews support the view that during economic crisis gender equality policy gets downgraded (Rubery 576-581).

The EU and Scottish approach to GM as a solution to gender inequality implies that there is no requirement for gender experts, despite the referral to civil society in the EU documentation. Furthermore, this has led to a lack of responsibility amongst the stakeholders. They believe that they have the right policies in place, therefore there is no requirement for further action to ensure there is no unintended gender consequences resulting from their projects or policies. However, there is no scrutiny of this, and it is simply an assumption which is not tested. Furthermore, the centralisation of ESIF by the Scottish Government has meant that there was a loss of regional expertise, leading to institutional memory loss in both gender and the administration of the ESIF. Therefore, the requirement for gender expertise both inside and outside the Scottish Government is needed more than ever. The requirement for gender expertise throughout the programme life cycle and the building of gender knowledge in 'street level' implementors should be written into the program. Targeted funding is therefore essential to ensure gender knowledge does not leak through the various levels and the needs of women are incorporated at every stage of regional development.

The Scottish approach to ESIF programme provides useful lessons on the implementation of GM. At a local level, the interviews suggest that GM remains a vague term of which there is very little understanding. If it is to perform its potentially transformative role, GM requires the structure and knowledge to be in place at a local level, but this requires political will at the national level. The evidence suggests that in Scotland this political will has been absent in recent years and GM has become an «empty signifier» present in name only in existing structures rather than transforming those structures.

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