



Implementation of the Istanbul Convention in the European Union

Shadow Report on Migrant Women (art. 59-61)

November 2025

INTRODUCTION

The **European Network of Migrant Women (ENoMW)** is the largest feminist platform representing migrant, refugee and asylum-seeking women across Europe. In **2024**, the Network launched **FULFIL**, the first European case law database documenting violations of the fundamental rights of migrant and refugee women (<https://www.womensrightsdatabase.eu/>). The same year, the Network published *A Women's Rights Perspective on the EU Charter of Fundamental Rights*, the first systematic assessment of the Charter from the viewpoint of migrant and refugee women. In **2022**, the Network produced a Europe-wide [report on undocumented migrant women](#), carried out together with TrustLaw of the Thomson Reuters Foundation. The analysis presented in this submission draws on these resources and on extensive evidence gathered through the Network's membership, most of which consists of migrant-women-led organisations working directly with women affected by violence, discrimination and rights violations.

This submission presents ENoMW's analysis of the European Union's implementation of the Istanbul Convention with a focus on **Articles 59, 60 and 61**, as well as the structural issues that cut across these provisions. It draws on the Network's extensive legal and policy work, its analysis of relevant EU legislation and its implementation at national level, and the substantial body of evidence regularly collected through ongoing engagement with member organisations. The report examines the gaps and inconsistencies that affect migrant, refugee and asylum-seeking women across EU asylum, migration and border systems, **situating these findings within the broader context of recent legal and policy developments in the European Union in the field of violence against women.**

EXECUTIVE SUMMARY

Residence Rights (Article 59)

This section examines how the current EU framework fails to provide migrant women fleeing violence with secure or autonomous residence pathways. It highlights the absence of legal safeguards for women whose residence depends on abusive partners or who lack regular status, and the resulting obstacles to accessing protection.

Violence Against Women as Persecution (Article 60(1))

This section focuses on the gaps in EU asylum law, which does not explicitly recognise violence against women as persecution, leading to inconsistent interpretations across Member States. It also addresses

recent developments in EU jurisprudence that affirm persecution on the basis of sex but remain unreflected in EU legislation and operational practice.

Reception and Asylum Procedures (Article 60(3))

This section examines the lack of binding EU requirements for female-sensitive reception conditions and trauma-informed procedures. It outlines how the absence of enforceable standards—such as single-sex accommodation and safe interview conditions—hampers women’s ability to disclose violence and receive fair assessment of their claims.

Non-Refoulement (Article 61)

This section analyses the shortcomings in EU border, screening and return systems, where sex-based risk assessments are not required before removal decisions. It shows how accelerated and border procedures fail to identify risks of violence, placing women at heightened risk of refoulement.

Cross-Cutting Issues

This section outlines the wider structural problems that undermine EU compliance with the Convention, including the absence of a human-rights-based definition of violence against women in migration policy, institutional fragmentation, the linkage between victim support and immigration enforcement, insufficient sex-disaggregated data, and the dilution of violence against women within broad “gender-based violence” frameworks.

Recommendations

The report sets out **general recommendations** addressing EU-wide legal clarity, terminology, institutional responsibilities, and the recognition of single-sex specialist services, followed by **specific recommendations** targeting each of the areas analysed under Articles 59, 60 and 61. These recommendations aim to ensure that EU law and policy fully comply with the Istanbul Convention and provide effective protection for migrant, refugee and asylum-seeking women.

Article 59(3): Residence permits for migrant women fleeing violence

Article 59 of the Istanbul Convention requires States to ensure that migrant women experiencing violence can obtain or retain residence independent of an abusive partner.

Despite this, **Directive (EU) 2024/1385** does not create any residence rights for migrant women fleeing violence. Its scope is limited to criminal and support-service measures and contains no provisions on residence permits, migration status or protection from removal. As a result, women whose residence depends on the perpetrator, or who have irregular status, lack clear guarantees that they can seek help without immigration consequences.

Evidence from ENoMW member organisations shows that many migrant women are effectively unable to access asylum or support services, and their experiences of male violence are rarely treated as persecution on the basis of sex. Residence dependency continues to trap women in abusive relationships, in contradiction with the protection aims of Article 59 and the broader human-rights obligations binding on the EU.

Exclusion from shelters and support services due to irregular status

Article 59 requires that residence status must not prevent access to protection or safe accommodation. Yet **Directive 2024/1385** contains no binding guarantees that undocumented migrant women can access shelters without immigration consequences. It includes no explicit prohibition on residence-status checks, no safeguards against data-sharing with immigration authorities, and no obligation to establish safe reporting mechanisms.

Testimonies from **ENoMW members** indicate that undocumented women continue to be turned away from shelters or avoid services due to fear of detention or removal. In the absence of explicit legal safeguards separating victim protection from immigration control, undocumented migrant women remain at high risk of being denied safety, contrary to the intended protections of Article 59.

ARTICLE 60(1): Violence Against Women as Persecution

Article 60(1) requires that violence against women be recognised as a form of persecution that gives rise to international protection. However, the current EU asylum framework, including Directive (EU) 2024/1385, does not explicitly establish violence against women as an autonomous ground for refugee or subsidiary protection. Women must continue to fit experiences of male violence into the existing grounds of the 1951 Refugee Convention, most often under “membership of a particular social group,” which obscures the sex-specific nature of the harm and leads to inconsistent recognition across the EU.

Recent case law of the Court of Justice of the European Union has clarified that systemic discrimination and violence against women can constitute persecution. In Joined Cases C-608/22 and C-609/22 (AH & FN v Austria), the Court held that women from Afghanistan constitute a particular social group due to the pervasive, structural discrimination they face, and that belonging to this group suffices to establish a well-founded fear of persecution. This ruling builds on earlier CJEU jurisprudence (C-621/21), which affirmed that EU asylum law must be interpreted consistently with the Istanbul Convention as well as the CEDAW Convention, including its understanding of violence against women as a human-rights violation requiring protection.

Despite this positive judicial development, there are significant concerns regarding its practical implementation. A [joint letter](#) sent on 16 October 2025 by the interior ministers of twenty EU Member States to the European Commission called for renewed voluntary and forced returns of Afghan nationals, without distinguishing between women and men, even though the CJEU has recognised Afghan women as a group facing systemic persecution on the basis of sex and nationality.

Accounts from ENoMW members indicate that women fleeing domestic violence, forced marriage, FGM, honour-based violence, sexual violence, sexual exploitation and trafficking continue to face difficulties in having these harms recognised as persecution. Their claims are often reframed as private matters or generalised crime rather than as forms of sex-based discrimination that require international protection. **The absence of explicit recognition of violence against women as persecution in EU law, combined with conflicting political pressures on returns, weakens the effective implementation of Article 60(1) and leaves many migrant women without adequate protection.**

ARTICLE 60(3): Reception and Asylum Procedures

Article 60(3) requires that asylum procedures and reception conditions systematically integrate the specific needs and vulnerabilities of women and girls experiencing violence. The current EU asylum framework, however, does not impose female-sensitive procedural safeguards as binding obligations. Directive (EU) 2024/1385 contains general references to victims of violence and to the need for sensitive treatment, but it does not establish enforceable standards requiring authorities to conduct sex-based risk assessments, provide single-sex accommodation, or ensure that interviews, interpretation and counselling can take place under conditions that guarantee safety and confidentiality for women.

ENoMW members report that in many EU Member States, women seeking protection continue to be placed in mixed-sex reception centres, including emergency facilities and detention-like environments, where risks of intimidation, harassment and coercion are heightened. Women are often interviewed in settings that do not ensure privacy or psychological safety, and where interpreters or interviewers are male despite clear indications that this inhibits disclosure of violence. These conditions undermine the ability of women to explain their experiences of abuse, particularly in cases involving intimate-partner violence, sexual violence, forced marriage or trafficking.

Although the European Union Agency for Asylum (EUAA) issues non-binding operational guidance on reception and procedures, these standards are implemented unevenly, and in many cases not at all. The lack of legally binding requirements means that crucial safeguards — such as single-sex accommodation for women at risk, trauma-informed interviewing, or the availability of female caseworkers and interpreters — depend on administrative discretion rather than enforceable rights.

This absence of binding procedural standards results in a protection gap for migrant and asylum-seeking women. It also contributes to inadequate assessment of asylum claims based on violence against women, as the procedural environment does not sufficiently support disclosure or recognition of the harms women suffer. Without clear EU-level obligations in reception and asylum procedures, the practical implementation of Article 60(3) remains fragmented and often fails to provide women with the safe conditions necessary to articulate their protection needs.

ARTICLE 61: Non-Refoulement

Article 61 requires States to ensure that women and girls at risk of violence are not returned to a country where they face persecution, torture or other serious harm. Within the EU legal framework, however, there are no binding obligations requiring authorities to conduct sex-based risk assessments before refusing entry, transferring, or removing a woman. EU border and return procedures prioritise rapid processing and containment, and Directive (EU) 2024/1385 does not introduce safeguards preventing the removal of women who are at risk of domestic violence, sexual violence, forced marriage, honour-related violence or other forms of female-specific harm.

ENoMW member organisations have reported that women at EU external borders are frequently channelled into accelerated procedures that do not allow for meaningful identification of violence, trauma, or vulnerabilities. Screening and border interviews are often brief, conducted in mixed-sex environments, and without adequate privacy or interpretation, making it extremely difficult for women to disclose violence or articulate their protection needs. Women who experience intimidation or sexual harassment during transit or in reception facilities may be unwilling or unable to approach authorities, and the absence of single-sex spaces and female officers further discourages disclosure.

In practice, many women are denied access to the asylum procedure at all, either through non-registration, de facto pushbacks, or decisions taken without an individualised assessment of risk. These practices conflict with Article 61, which requires States to assess the specific risks of return for women experiencing or fleeing violence, including systemic sex-discrimination and persecution of women because they are women.

Although the EU asylum acquis incorporates the principle of non-refoulement, its practical implementation remains inconsistent. ENoMW knows of multiple cases where women at risk of male violence were removed or threatened with removal without any examination of the dangers they faced in the country of origin. In some contexts, women whose asylum claims are based on domestic or sexual violence are treated as having “private” claims, deemed unrelated to persecution, and consequently channelled into return procedures without proper assessment. The absence of explicit EU-level requirements for female-focussed non-refoulement contributes to this gap and leaves migrant women without adequate safeguards.

These shortcomings are compounded by political pressures to increase returns, including for countries where persecution of women on the ground of sex is widely documented. In such an environment, the lack of mandatory, sex-based risk assessments and the widespread use of accelerated or border procedures undermine the practical application of Article 61 and place women at heightened risk of refoulement.

CROSS-CUTTING ISSUES

While Articles 59–61 highlight specific gaps in residence rights, asylum procedures and non-refoulement, several broader structural issues cut across the entire EU legal and policy framework affecting migrant and asylum-seeking women. These cross-cutting issues weaken the implementation of the Istanbul Convention and create a fragmented, inconsistent protection landscape.

1. Absence of a Human-Rights-Based Definition of Violence Against Women in EU Migration and Asylum Law

A central cross-cutting issue is the complete disconnection between the EU’s violence-against-women framework and its migration and asylum legislation. The **EU Migration and Asylum Pact**, a package of several legislative instruments, is almost entirely **blind to women as a group**. Across the entire Pact, women are mentioned only in passing, typically in reference to pregnancy or generic vulnerability. Nowhere does the Pact recognise women as a specific group exposed to persecution, nor does it reflect the Istanbul Convention, the Directive on Violence Against Women, GREVIO recommendations, CEDAW, or findings of the UN Special Rapporteur on violence against women.

This omission has profound consequences: EU migration and asylum rules are drafted and implemented as if women were neutral applicants, despite the fact that they constitute half of the refugee and migrant population and face forms of violence at all stages of migration. Without explicit acknowledgement of these realities, it is impossible to build consistent, female-sensitive asylum procedures or protection pathways.

2. Fragmentation and Institutional Disconnect Within EU Governance

Another major cross-cutting problem is the **institutional fragmentation between EU bodies**, particularly between **DG HOME** (responsible for migration, asylum and borders) and **DG JUSTICE** (responsible for fundamental rights and violence against women). Violence against women is treated largely as a matter for DG JUSTICE, while DG HOME — despite overseeing the systems through which migrant and asylum-seeking women seek protection — does not integrate a female-sensitive or sex-specific perspective into its policies.

Simultaneously, tensions between the European Commission and Member States regarding migration governance contribute to inconsistent implementation. Migrant and refugee women are frequently **shifted between institutional mandates**, with neither EU nor national actors assuming full responsibility for establishing binding standards. Women's rights become collateral damage in these inter-institutional dynamics, reinforcing inequality and fragmentation across the EU.

3. Structural Link Between Victim-Support Systems and Immigration Enforcement

ENoMW members consistently report that migrant women are not perceived as legitimate victims within EU migration systems. Many women avoid approaching shelters, police, health services or victim support services because contact with authorities may expose them to residence-status checks, detention or removal. This structural link between victim-support systems and immigration enforcement creates a powerful chilling effect that disproportionately harms undocumented women or women dependent on abusive partners for residence status.

Because protection mechanisms are not separated from migration control, migrant women's rights under Articles 59–61 remain largely theoretical in practice.

4. Lack of Harmonised Sex-Disaggregated Data and Monitoring Mechanisms

The EU lacks a harmonised framework for collecting sex-disaggregated data capable of capturing the specific experiences, risks and outcomes of migrant women. Existing EU data collection rarely disaggregates by sex, and where it does, categories are inconsistent or non-comparable across Member States. There are no unified indicators for sex-based asylum claims, protection outcomes, refusals of entry, returns, or access to shelters.

Without accurate data, the scale and patterns of violence against migrant women remain obscured. Systemic discrimination cannot be measured, and EU institutions lack the evidence base necessary to assess compliance with Articles 59–61 or design targeted interventions. This data deficit reinforces the invisibility of migrant women in EU policy.

5. Neutralisation of Violence Against Women Through the Shift to “Gender-Based Violence”

A fundamental issue is the conceptual shift within EU policy from “**violence against women**” (VAW) to the broader, neutral category of “**gender-based violence**” (GBV). While the Istanbul Convention defines GBV as violence “directed against a woman because she is a woman,” EU institutions increasingly use the term to encompass multiple forms of harm unrelated to women.

This shift **neutralises the analysis of the nature of violence against women**, obscures structural inequality, and makes both victims and perpetrators less visible. It also fragments funding: even where EU budgets for “GBV” increase, resources are distributed across multiple groups and categories. Specialist women’s services — including migrant-women’s organisations — become marginalised as funding for violence against women is absorbed into broad GBV envelopes. This approach is **contrary to the structure and intent of the Istanbul Convention**, which treats violence against women as a specific human-rights violation requiring targeted measures and dedicated resources.

6. Terminological Confusion, Translation Problems and the Impact of Legal Sex Self-Declaration

A further cross-cutting problem is the pervasive **terminological inconsistency** in EU policymaking. The term “**gender**” is used interchangeably to mean sex, gender roles, gender identity, sexual orientation, or combinations of these. This departs from the Istanbul Convention, which defines gender as socially constructed roles, behaviours and attributes.

The problem is amplified in translation. In several EU languages — particularly those without a native term for “gender” — “gender” is routinely translated as “**sex**”, effectively rendering sex a social construct. This produces contradictions between the English and national-language versions of EU instruments, generating confusion in national implementation.

These inconsistencies are compounded by the introduction of **self-declaration of legal sex** in several EU Member States. Where legally registered sex can be changed on the basis of self-identification, the categories needed for monitoring sex-based discrimination, allocating funding to women’s organisations, or maintaining single-sex services become impossible. This creates practical difficulties for implementing the Istanbul Convention, addressing violence against women, establishing specialist services, and collecting sex-disaggregated data.

7. Consequence: Fragmented and Unequal Protection Across the EU

Taken together, these cross-cutting issues reveal a structural misalignment between the EU’s migration and asylum architecture and its obligations under the Istanbul Convention. The invisibility of migrant women in the Migration and Asylum Pact, combined with institutional fragmentation, the conflation of victim support with immigration enforcement, and the absence of harmonised sex-disaggregated data, results in a protection system that is inconsistent, discretionary and often incompatible with Articles 59–61. Migrant women who are victims or at risk of violence remain among the least protected groups within the EU’s asylum and migration systems.

RECOMMENDATIONS

GENERAL RECOMMENDATIONS

The European Commission, the European Parliament and the Council of the European Union should:

1. Promote Cross-Departmental Coordination and Meaningful Consultation

- The European Commission should ensure effective cross-departmental collaboration between all Directorates-General working on violence against women, asylum, migration, health, and fundamental rights—particularly DG JUST and DG HOME—to guarantee policy coherence across all relevant legislative and operational instruments. This coordination must go beyond *gender mainstreaming*, which has often contributed to the invisibility of women, and instead adopt a **dual approach that combines mainstreaming with targeted positive measures** addressing the specific situations of migrant, refugee and asylum-seeking women. All proposals, regulations and policy initiatives —especially those originating from DG JUST and DG HOME—should undergo an impact assessment from the women’s rights perspective, and those related to VAWG must undergo thorough a consultation with specialist frontline women’s rights - including migrant women - organisations, ensuring that their expertise is meaningfully integrated into EU policy development and implementation.

2. Restore Legal Clarity in EU-Level Work on Violence Against Women

- European institutions should restore clarity by ensuring that the protected characteristic **sex**, as defined in EU primary law, is used correctly and consistently in all EU-level work on violence against women, and **not conflated** with other concepts.
- Ensure that the term “**gender**” is used **exclusively** in the meaning established in **Article 3(c) of the Istanbul Convention**—as socially constructed roles—and **not** in place of biological or legally recorded sex.
- Guarantee that EU terminology relating to violence against women, gender-based violence, asylum and migration aligns with EU primary law and the Istanbul Convention, avoiding conceptual ambiguity that weakens legal protections for women and girls.

3. Ensure Accuracy and Legal Consistency in EU Translations

- Develop mechanisms to ensure that translations of EU legislation, communications and policy documents across all EU languages maintain accurate legal terminology in all areas concerning violence against women.
- Ensure that:

- “**sex**” is always translated as the legal category “sex”,
- “**gender**” is translated in accordance with the Istanbul Convention definition,
- Member State language versions do not introduce errors or terminology that contradicts EU primary law or the Istanbul Convention.
- Introduce a quality-control system for all translations of EU legal and policy texts on violence against women, capable of identifying and correcting terminological inconsistencies and ensuring coherence across institutions and national versions.

3. Ensure Terminological Compliance and Substantive Training for EU Civil Servants

- Require that civil servants and staff across all relevant European Commission Directorates-General, as well as staff in the relevant EU agencies, receive **mandatory, comprehensive and ongoing training** on:
 - the Istanbul Convention;
 - correct distinctions between **sex, gender, gender roles, gender-based violence as a generic term, gender based violence against women, and violence against women;**
 - the work and standards of the UN Special Rapporteur on Violence Against Women and Girls;
- Ensure that this training goes beyond formal or symbolic requirements and genuinely equips EU staff to apply correct legal terminology.

4. Recognise Single-Sex Specialist Services as Lawful and Necessary

- Explicitly affirm across EU policy, legal instruments and strategic documents—including the forthcoming **EU Gender Equality Strategy 2026–2030**—that **single-sex specialist services** for women and girls affected by male violence (including migrant, asylum-seeking and refugee women) are:
 - **lawful,**
 - **legitimate,**
 - **necessary,**
 - protected under EU primary law,
 - and required by the Istanbul Convention.
- Recognise the right of women and girls to access **single-sex accommodation, shelters, rape crisis centres, counselling and specialist services** across all policy fields addressing violence against women, asylum, migration, reception and trafficking.
- Ensure that **positive measures** to protect women and girls from male violence—including specialist women’s services and single-sex spaces—are not mischaracterised as discriminatory toward other groups. Such measures must be recognised as permissible and required under EU law, including the EU Directive on **Equal Access to Goods and Services Directive (2004/113/EC)**, and in line with the obligations set out in the Istanbul Convention.
- Guarantee that EU-level policy and funding frameworks **actively support specialist women’s services**, including organisations led by and for migrant and asylum-seeking women, as a core component of the EU’s compliance with the Istanbul Convention.

SPECIFIC RECOMMENDATIONS

1. RESIDENCE RIGHTS

The European Commission should:

- Propose legislative amendments to the EU migration and asylum acquis to ensure that migrant women fleeing violence can obtain **autonomous residence permits**, irrespective of marriage duration or dependency on an abusive partner.
- Introduce binding provisions requiring residence permits to be **granted or renewed** when a woman's stay is necessary due to her personal situation or for cooperation in criminal proceedings, including forced-marriage situations.
- Ensure that all relevant EU legal instruments incorporate **residence dependency** as a barrier to escaping male violence and mandate safeguards to address it.

EUAA should:

- Issue guidance to EU MS requiring national asylum and immigration authorities to recognise migrant and refugee residence dependency as a **vulnerability** that must inform case assessments.

2. Data Collection and Monitoring

The European Commission and Eurostat should:

- Establish an EU-wide framework for **sex-disaggregated data collection** on autonomous residence permits, including type of permit and grounds for issuance or renewal.
- Require Member States to report **sex-disaggregated data** on asylum claims based on violence against women, including recognition rates and procedural outcomes.

FRA and EIGE should:

- Develop common indicators to monitor the treatment of migrant and asylum-seeking women across asylum, reception, border and return procedures, including the use and outcomes of **sex-based risk assessments** and protection measures.

EUAA should:

- Harmonise monitoring tools across Member States to track treatment and outcomes for women in asylum and reception facilities.

3. Mandatory Training and female-sensitive Asylum Procedures

The European Commission should:

- Mandate through legislation that asylum, migration, reception, screening and border-procedure staff receive **mandatory, standardised training** on violence against women, trauma-informed interviewing, persecution of women as women, and barriers to disclosure.

EUAA should:

- Develop operational standards and training modules for asylum caseworkers, interviewers, interpreters, and reception staff on:
 - residence dependency
 - domestic violence
 - forced marriage
 - honour-based violence
 - sexual violence
 - sexual & reproductive exploitation
 - women-centred trauma-informed procedures
- Ensure that **interviews, counselling, interpretation and screening** can be conducted in **single-sex settings** when required for the safety, dignity or privacy of the applicant.

The Commission and EUAA should:

- Require all asylum reception and accommodation facilities funded or regulated under the EU asylum acquis to provide **single-sex accommodation** for women, including in large-scale reception centres, emergency shelters and detention-like facilities.

4. Risk Assessment and Non-Refoulement

The European Commission should:

- Introduce binding obligations in asylum, screening and return instruments requiring **sex-based risk assessments at all stages**, including border entry, reception, asylum examination, relocation, and return.
- Mandate that **no return, non-admission or deportation decision** may proceed without an individualised assessment of risks such as domestic violence, honour-based violence, forced marriage, FGM, sexual violence, trafficking or prostitution-related exploitation.
- Prohibit pushbacks and summary expulsions by embedding **female-sensitive non-refoulement** obligations into all external-border and return procedures.

Frontex should:

- Integrate sex-based risk assessment protocols into its border-control operations, screening processes, return operations and monitoring mechanisms.
- Train deployed staff on the identification of women at risk of violence and their referral to protection actors.

EUAA should:

- Ensure coordinated referral pathways between border authorities, reception authorities and asylum authorities so that women at risk are transferred to **single-sex accommodation, shelters, legal aid and psychosocial support** before any return-related action is taken.

5. Access to Shelter

The European Commission should:

- Establish legally binding guarantees that access to shelters, legal assistance, protection services and psychosocial support **is not conditioned on immigration or residence status**.
- Require Member States, through EU-level legislation (e.g. amendment to the EU Directive on VAW), to ensure the availability of **single-sex accommodation** within all EU-funded or EU-regulated shelter systems.

EUAA should:

- Include specialist, sex-specific shelter provision and **culturally competent services** as a standard within EU reception conditions and operational guidelines.

FRA and EIGE should:

- Monitor EU MS compliance with single-sex accommodation requirements and the accessibility of shelters for undocumented and asylum-seeking women.

6. Violence Against Women as Persecution

The European Commission should:

- Propose amendments to the EU Qualification Regulation and Asylum Procedures Regulation to explicitly recognise **violence against women as persecution** and as serious harm triggering international protection.
- Ensure that rape, sexual violence, sexual exploitation, forced marriage, honour-based violence, are listed as **autonomous grounds** for refugee or subsidiary-protection status.
- Require asylum systems to apply a **sex-specific interpretation** of “membership of a particular social group.”

EUAA should:

- Issue a guidance to harmonise recognition of VAWG-based asylum (as opposed to GBV that dilutes VAWG cases) claims across the EU, including the need for female-sensitive **trauma-informed procedures** and understanding of barriers to disclosure during interviews.

7. EU Funding

The European Commission should:

- Ring-fence funding within CERV–DAPHNE, AMIF and other EU funding instruments for **specialist women led organisations, including migrant women organisations, and violence-against-women services**, including shelters, legal aid and health services.
- Require all EU-funded programmes in asylum, reception, migration and anti-violence sectors to integrate **sex-based risk assessment tools** into their operations.
- Require all EU-funded programmes to conduct **mandatory sex-disaggregated monitoring and reporting**, extending it to residence permits, asylum outcomes, shelter access and non-refoulement safeguards.
- Ensure long-term sustainability of funding lines supporting specialist protection services for migrant and asylum-seeking women.

EIGE, FRA and Eurostat should:

- Support the Commission by developing indicators, data standards and monitoring frameworks for evaluating the impact of EU-funded programmes on migrant women.