

Organizing intersectional equality policymaking in R&I: Facilitators, barriers, and case insights

Third Working paper KSH3 - Intersectionality

THIS DOCUMENT IS MEANT FOR ANYONE INVOLVED IN THE DESIGN AND IMPLEMENTATION OF INTERSECTIONAL EQUALITY POLICIES IN HIGHER EDUCATION AND RESEARCH ORGANIZATIONS

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Executive summary

This Third Working Paper of the Knowledge and Support Hub 3 (KSH3) on Intersectionality seeks to bridge INSPIRE's empirical research and everyday practices of actors advancing institutional change towards intersectional equality in Research & Innovation (R&I), with a specific focus on Higher Education & Research (HE&R) organizations. Drawing on in-depth case studies and a participatory knowledge exchange event, this paper offers both case insights and practical insights of, and for, actors striving to embed intersectionality into their Gender Equality Plans (GEPs) and/or Equity, Diversity and Inclusion (EDI) policies. This paper follows the previous two working papers of KSH3 on [*Translating ambitions of R&I intersectional equality policies*](#) and [*Cultivating intersectional equality policies and practices in R&I*](#).

This working paper has two interrelated aims. First, it provides **a brief summary of the multiple case study on intersectional equality policy-making** across nine HE&R organizations. This summary is based on [*our report D3.5*](#) (authors: UHasselt; contributors: ZRC-SAZU, Radboud University, Fraunhofer ISI and the Open University of Catalunya). This summary underscores the context-specificity of intersectional equality policies and practices, and discusses which political strategies institutional actors can adopt to translate intersectionality into the design, implementation and governance of organizational intersectional equality policies. By adopting an open understanding of intersectionality as (1) overcoming siloed, single-axis approaches and (2) tackling power imbalances, the analysis of the cases allowed us to identify **multiple factors facilitating and hampering the intersectional equality policy-making process - in terms of policy design, governance and implementation**.

Second, the paper discusses the **outcomes of a participatory and co-creative knowledge exchange event** that built on the factors identified in the case studies. This event involved two breakout room sessions **in which participants evaluated the identified facilitating and hampering factors and reflected on how they integrate an intersectional perspective in their own institutional contexts**. This approach not only validated the research insights but also generated insights of the different political strategies institutional actors use that work on

intersectionality in practice, which can be useful for academics and policy actors in similar positions to draw from.

The paper ends with reflections from the KSH3 experts (Ashlee Christoffersen (York University), Barbara De Micheli (Fondazione Giacomo Brodolini), Bruna Cristina Jaquette Pereira (Universidad Complutense de Madrid) and Irina Lungu (Technical University of Iasi)) and the KSH3 Communities of Practice (Intersectionality4Change, WISE CoP and Open EU). Their contributions enrich the paper's aims with their expertise on institutional change towards intersectional equality, beyond the INSPIRE project. This iterative feedback process showcases the importance of mutual learning and shared knowledge production.

1. Facilitators and barriers: case insights on intersectional equality policy-making

Since 2022, The European Commission (EC) has made GEPs an eligibility criterion for funding in Horizon Europe projects. An intersectional perspective has been foregrounded as a key element to these organizational equality policies and integrated in the Commission's institutional policies such as the Union of Equality Agendas (European Commission, 2020a-d; 2021) and the newest Strategic Plan for R&I (European Commission, 2025). Other (supra-)national institutions such as the United Nations (2021) and Advance HE (2021) are also urging HE&R organizations to adopt an intersectional perspective. These policy-makers are backed up by numerous studies that point out that intersectional equality policies better address the complex reality of inequalities and avoid that equality initiatives invertedly leave the most vulnerable behind.

While increasing attention has been given to intersectional equality policies, it has been argued that they are actually rarely being adopted in HE&R organizations. Multiple explanations for this absence have been advanced: (1) the lack of knowledge and/or support from institutional actors to translate the 'complex' theory into practice, (2) the political backlash against intersectionality hampering the translation into policies, (3) a fear of "gender dilution" if the scope of equality policies is widened to other discrimination grounds, and (4) institutions adopting a mere symbolic approach to intersectional equality policies, stripping it from its critical tenet to foster transformative change. While these insights reveal current barriers regarding intersectional equality policies, they provide us with fewer insights on how to facilitate or 'do' intersectional equality policies. Therefore, INSPIRE has focused on empirically investigating and theorizing the 'doing' of intersectionality in organizational policy-making processes through a focus on the policy design, governance and implementation.

Building on our working definition of intersectionality as a theory, methodology and critical tool, we have developed a [methodological framework](#) that adopts an inductive approach to intersectionality. **Instead of looking at how an "ideal intersectional policy" should look like, we looked at existing policies and practices in HE&R organizations that indicate "traces of intersectionality". More specifically, we aimed to understand intersectionally-informed policies that simultaneously meet two criteria, which we consider as core to intersectionality: 1) they are designed, implemented and/or governed in ways that overcome siloed or single-identity policy approaches, and 2) they address power inequalities.** In order to maximize the likelihood of finding intersectional policies, we sampled 'extreme cases,' which have relatively developed equality policies

addressing multiple grounds of discrimination and inequality. In doing so, we conducted semi-structured interviews with organizational actors involved in the policy design and implementation and/or are affected by the policies, and engaged in document analyses of GEPs, EDI policies, national reports, etc. and (where possible) in observations of events and meetings concerning EDI. The results of the case studies are summarized in the following framework.

	Organizational	Extra-organizational
Facilitating factors	1. Expertise and familiarity with the concept of intersectionality 2. Support of the top for intersectional policy making 3. Organizational structures supporting intersectional policy making - o Horizontal - o Vertical 4. Gender policies as a springboard for intersectional policy making 5. Increased internal diversity	1. Equality-related eligibility criteria for research project funding 2. (Supra-)national legislation mandating attention to different axes of inequality 3. National policies fostering equality policy making 4. Demographic shifts in the organization's context 5. Pressures from societal stakeholders to adopt equality policy 6. Equality certifications 7. External networks supporting equality policy making
Hindering factors	1. Lack of resources for intersectional policy making 2. Lack of ownership of and accountability for the implementation of intersectional policy making 3. Persisting dominance of gender in (intersectional) equality policy making 4. Lack of intersectional data 5. Vertical or horizontal segregation of (intersectionally) minoritized groups	1. Limited or constraining national law 2. Unsupportive or hostile socio-political context 3. Sector-wide academic culture and structure

On the one hand, the analysis revealed the **limited presence of equality policies that are intersectional in terms of their design, governance and implementation**. On the other hand, in these organizations, **we could observe a wide array of manifestations of emergent intersectional policy making, offering an initial repertoire of possible strategies and actions** that can be enacted to advance equality and social justice. The traces are most visible in the design of policies and the governance structures that foster the coordination of integrated (single-axis) policies. In policy design, **both explicit and implicit uses of intersectionality as a label in policies** were used to foster a shared understanding, first about how to work towards intersectional equality without always naming it as such. Policies named through other concepts, such as EDI, social safety, human rights, social justice, appeared to be intersectional, as they mentioned the ambition to work transversally – as opposed to in siloed ways – and to address the disadvantages at the intersections of multiple axes of inequality. In policy governance, multiple ways were identified to **enhance the participation, coordination and alignment of needs and goals across multiple actors**, both vertically (bridging hierarchical positions) and horizontally (bridging social identities). In both policy phases, these political strategies aim to increase the support for intersectional equality policies while decreasing the likelihood that intersectionally minoritized groups are invisibilized and disadvantages that they experience reproduced. In terms of implementation, policies were often not yet monitored or translated into tangible actions. If there was implementation in place, **practices were often unequally distributed across inequality axes and across the organizations**. Conversely, **some practices were present that advanced intersectionality through informal practices, rather than formally** such as open door policies, safe(r) spaces and student-led, bottom-up initiatives. This indicates how policy governance, design and implementation are interconnected to move intersectional equality policy-making forward, or hindering it, and both the assessment of existing policies and the envisioning of novel intersectional policies require careful consideration of all three aspects of intersectional policy-making in an integrated way.

The analysis highlighted how hindering and facilitating factors co-shape the intersectional equality policy-making. **These factors are not mutually independent but interconnected.** For example, facilitating factors such as national policies and legislation can foster managerial support and contribute to the development and recognition of intersectional knowledge. In contrast, a hostile political climate can hamper the resources and accountability for developing intersectional equality policies. Moreover, certain factors may either facilitate or hinder intersectional equality policy-making depending on the organization's capacity to mobilize them for this purpose. For instance, the requirement to adopt gender equality policies may increase expertise and accountability for equality work, providing a springboard for developing intersectional equality policies. However, it may also reinforce gender as the primary focus of equality work, neglecting how race, LGBTQ+, religion, class, disability, etc. are essential intersectional inequality axes for fostering equality and social justice towards institutional change. **This framework therefore helps to identify the possibilities for advancing intersectional equality policy-making in a more multiple and open-ended way**, by mapping both the facilitators and barriers embedded in existing policies and practices.

2. Relating factors to actors: knowledge exchange insights

Time	Content
2 pm - 2.10 pm	Welcome. Introduction & outline of the event
2.10 pm - 2.50 pm	Presentation of the results of the case studies in intersectional policies conducted by Hasselt University (30') Q&A - Questions, comments and feedback from CoPs and experts (10')
2.50 pm - 3.30 pm	Introduction to the breakout room sessions : Instructions for a two-rounds participatory interaction. (10') First round: Validation of facilitating and hindering factors stemmed from the case studies (30')
3.30 - 3.45	BREAK
3.45 pm - 4.15 pm	Break-out rooms . Instructions for the second round (5'). Meaningful conversations around how to relate the main facilitating and hindering factors to key actors' practices
4.15 pm - 4.55 pm	Plenary exchange & discussion
5.55. pm - 6 pm	Wrap-up & farewell

The Third Knowledge Exchange Event (KEE3) took place virtually on the 17th of March, from 2pm until 6pm. There were 20 participants, including all KSH leaders, the four experts and members of each Community of Practice (CoP). The goal of this KEE3 was to reflect on the case insights and discuss participants' experiences on translating intersectionality into their own organizational policies. The KEE3 is based on a participatory and co-creative process by involving both researchers and practitioners, using the online collaborative platform Miro to facilitate the breakout rooms, and conclude with plenary discussions.

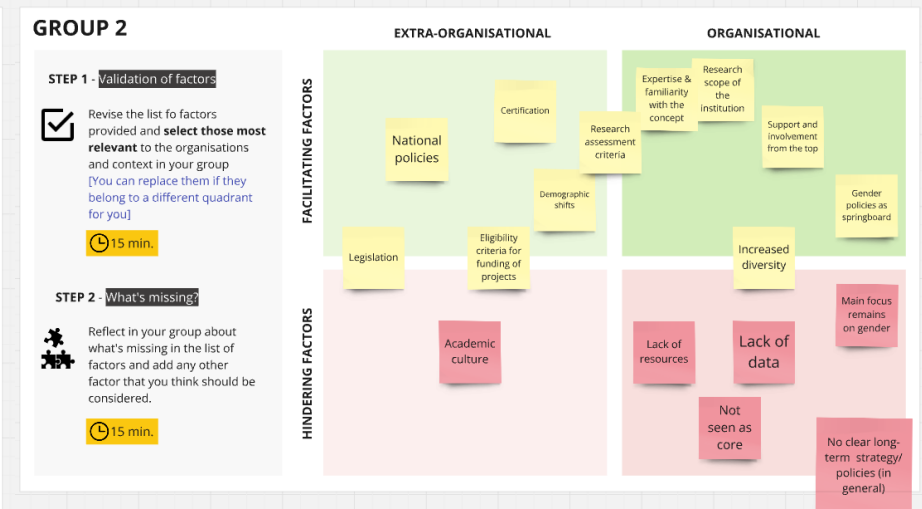
The event was structured in three main parts. First, UHasselt presented the goals and preliminary results of the multiple-case study on intersectional equality policy-making. Second, Notus introduced the purpose of the break-out rooms, divided into four groups, each coordinated by one expert and one KSH leader, with CoPs as participants. The first break-out session focused on validating the identified factors and the second on relating these factors to actors' practices in their own institutional contexts. Finally, a plenary discussion summarized the break-out insights and created a synthesis of all four groups.

1. Validation of factors

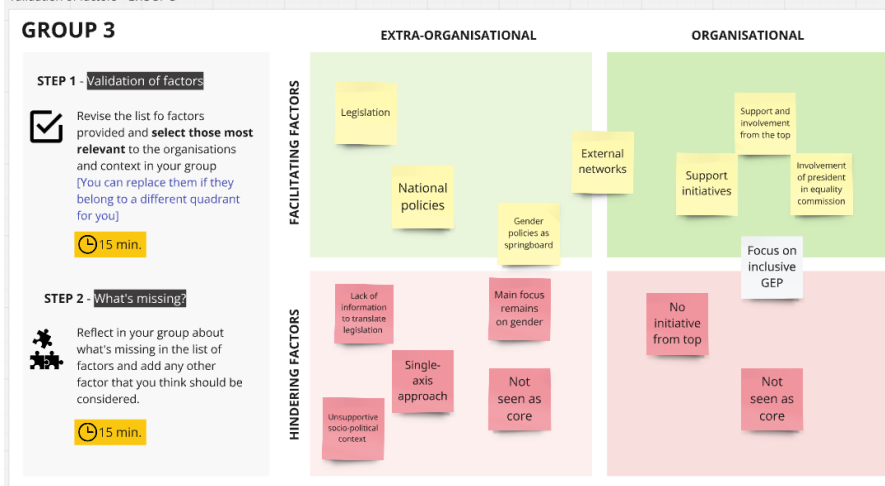
Validation of factors - GROUP 1



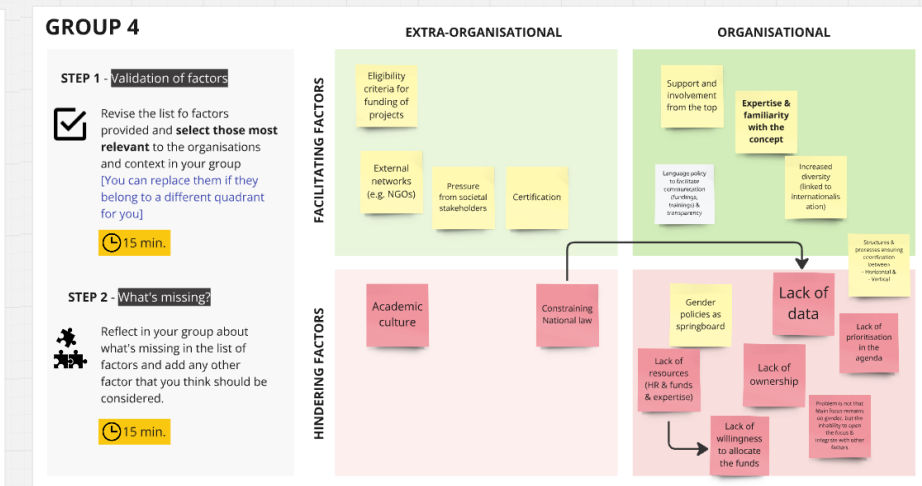
Validation of factors - GROUP 2



Validation of factors - GROUP 3



Validation of factors - GROUP 4



In the first break-out room sessions, participants were presented with 20 facilitating and hampering factors identified through the case studies. Working in four groups of 2-3 people, each coordinated by a KSH leader and KSH expert, they discussed which factors they considered key for policy-making within their organizations and were able to add new ones.

At the extra-organizational level, **participants identified national legislation and policy frameworks as crucial facilitators**, as they **create external legitimacy for internal change**. This is particularly the case when legal requirements explicitly address discrimination grounds beyond gender and provide resources through eligibility criteria, managerial support and monitoring mechanisms. Examples included recent Spanish legislation mandating action on LGBTQ+ issues and the adoption of anti-racist higher education principles in Ireland through Athena Swan. External pressure from NGOs and societal stakeholders was also seen as important for embedding intersectionality, as these actors can push institutions to act and transfer practice-based expertise into academic settings.

At the organisational level, **expertise and familiarity with intersectionality** along the **involvement and sustained support of top management** emerged as the most consistently cited facilitators. Increased knowledge and managerial support **directly influence leadership engagement, resource allocation, and cross-cutting coordination between actors**. Organizational learning was noted to not only depend on internal mechanisms but also through inter-organizational exchanges. **Learning from other HE&R organizations** with similar policies, participating in national equality networks, and meeting EU eligibility criteria such as GEPs help to legitimise and accelerate institutional change. Participants also stressed the importance of evolving internal governance structures, such as **broadening the scope of gender or diversity committees** to overcome siloed, single-axis approaches and **strengthening managerial involvement**. One example was adopting an “**intersectional language policy**”, similar to those on non-sexist language or inclusive language guidelines. This policy would facilitate communication between actors and contribute to transparency about the expectations in the policy process from actors in different positions of power.

However, multiple barriers were mentioned that **persist within and outside the walls of HE&R organizations**. Some lie beyond their direct control, including **political shifts towards anti-democracy, anti-migrant and anti-gender movements, and entrenched academic hierarchies** that reproduce structural inequalities. Moreover, when policies are designed as intersectional, their implementation often reverts to a single-axis (mainly gender-based) focus, which is an issue reflected in both (supra-)national and institutional levels. As gender equality often remains the dominant policy priority to collect data on for reporting purposes, organizations tend to revert to gender+ approaches rather than implementing true intersectional approaches. This limited framing is compounded by resistances from **disciplines that question the relevance of equality initiatives altogether and by the still often precarious positions of researchers from marginalised groups**, which restricts their ability to participate in decision-making that involves institutional change. Participants therefore mentioned that while often expanding equality agendas is considered as vital, there is still a fear of “gender dilution”. This creates a barrier in which GEPs are not denied as such, but rather need to be reconceptualized within a genuinely intersectional policy framework, that views inequalities as overlapping and indivisible from one another, rather than as being in competition, and that recognises that placing those who are most marginalised in the centre of policymaking will also benefit others less disadvantaged (Crenshaw 1989). **The lack of data, resources and prioritisation was also identified as both a cause and a consequence of limited institutional willingness** to advance intersectionality in a systematic and structural way.

Finally, some factors were described as double-edged. **Focusing on gender can provide an effective entry point for broader equality work but may also reinforce gender’s dominance** or, in certain political contexts, provoke anti-gender backlash. Similarly,

governance structures that lack cross-cutting coordination risk fragmenting efforts rather than fostering systemic change towards intersectional equality.

To conclude, participants agreed that meaningful progress towards intersectional equality is slowly happening. However, it requires more than support on paper but also strong political will, conceptual clarity on intersectionality, and sustained prioritisation to embed intersectionality as a guiding principle of institutional transformative change.

2. From factors to actors

	Organizational	Extra-organizational
Facilitating factors	1. Expertise and familiarity with the concept of intersectionality 2. Support of the top for intersectional policy making 3. Organizational structures supporting intersectional policy making - Horizontal - Vertical 4. Gender policies as a springboard for intersectional policy making 5. Increased internal diversity	1. Equality-related eligibility criteria for research project funding 2. (Supra-)national legislation mandating attention to different axes of inequality 3. National policies fostering equality policy making 4. Demographic shifts in the organization's context 5. Pressures from societal stakeholders to adopt equality policy 6. Equality certifications 7. External networks supporting equality policy making
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FACILITATING FACTORS

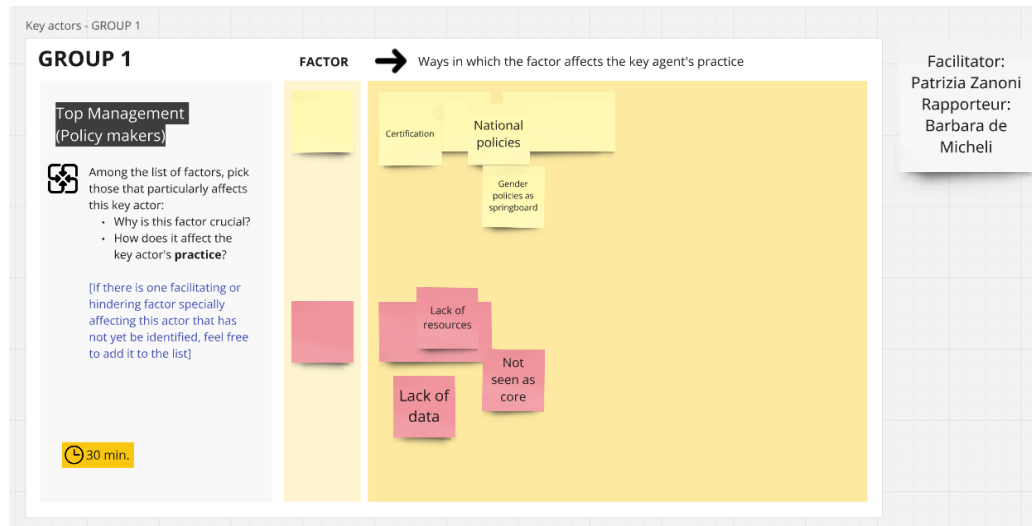
	In-house expertise with intersectionality	Top-management support	Governance structure	Gender policies as springboard	Equality eligibility criteria in research funding	(Supra-) national legislation	National policies	Demographic shifts	Pressure from external societal stakeholders	Equality certifications	External networks support
ACTORS											
Top management					X						X
Middle Management		X				X	X				
Minoritized students and staff	X		X		X	X					
EDI officers/managers				X						X	

HINDERING FACTORS

	Lack of resources	Lack of ownership and accountability for implementation	Gender dominance in equality policy-making	Lack of intersectional data	Vertical and horizontal segregation of minoritized groups	Limited or constraining (supra-)national legislation	Unsupportive or hostile socio-political context	Exclusionary academic culture and structure
ACTORS								
Top management	X							X
Middle Management	X						X	X
Minoritized students and staff	X	X		X				
EDI officers/managers	X			X				

In the second break-out room sessions, participants were divided into four actor groups (top management, middle management, students and staff, and EDI officers) to discuss which factors are especially essential in their role. These sessions were coordinated by a KSH leader and KSH expert with notable experience with these types of actors. Participants were asked to not only indicate which factors, but also how this factor affects their practices.

Group 1: Strategies from, and for, top management

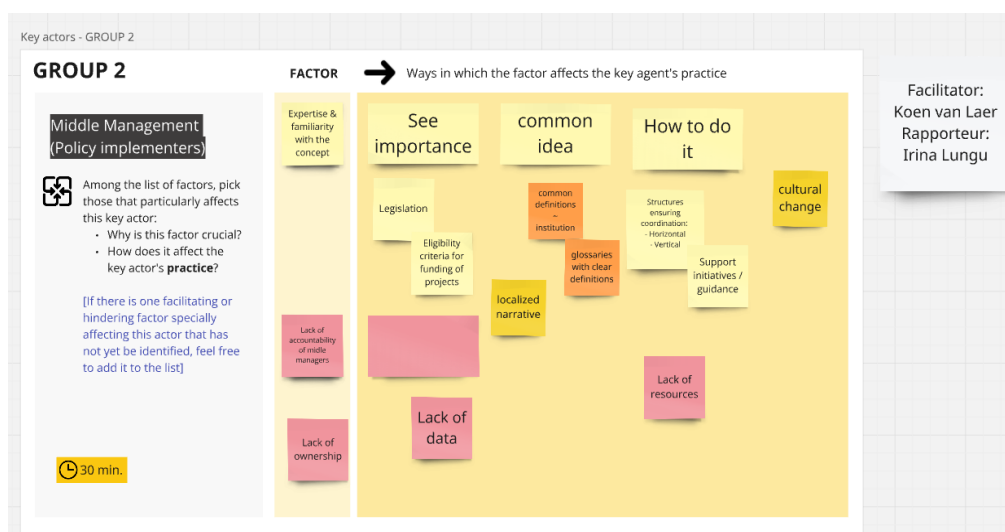


Participants highlighted that engaging top management and policy makers is both essential and strategic for embedding intersectionality within Higher Education and Research (HE&R) institutions. **Senior leaders hold the authority to align intersectional equality goals with institutional strategies**, allocate resources, and legitimise diversity and inclusion as central to the organisational goals.

1. A key facilitating factor identified was the ability to **build convincing business cases for intersectional equality**. **Framing equality as integral to institutional performance**, innovation, and reputation helps move the discussion **beyond social justice or mere compliance arguments**. This approach resonates particularly well in environments where decision-making is driven by risk management and measurable outcomes. Participants noted that top managers are increasingly required to balance organisational reputation and stakeholder expectations amid polarised public debates on equality and diversity. Supporting them in managing these tensions, while keeping a clear focus on the needs of Intersectionally minoritized actors, can make intersectionality more actionable and less politically contentious.
2. **Making equality policies mandatory** through national policies and legislation were identified as powerful external drivers, as it **creates the necessary external pressure to prioritise them internally**. Participants pointed to Italy's new Gender Equality Certification as a good example: it provides tangible institutional incentives, such as access to gender-sensitive procurement and fiscal rewards, while certifying internal processes that promote gender equality. While such certification frameworks focus on gender and often provide support for quantitative rather than structural change, they demonstrate how policy instruments can align compliance with strategic benefits, motivating leadership to take ownership of equality objectives.

- Participants also discussed the potential of **data-driven approaches in engaging top management, especially in STEM-oriented institutions**. Using robust quantitative data to highlight inequalities such as gender imbalances, pay gaps, or health outcomes can help anchor discussions in evidence rather than ideology. In the field of Medicine, for example, the recognition that sex, gender, race, and socio-economic factors affect health outcomes provides a powerful scientific rationale for operationalising intersectionality as a legitimate methodological and analytical framework.
- Participants emphasised the importance of **acknowledging personal motivations and agendas of top managers**. Many leaders, such as rectors or deans, are elected and therefore **attuned to the expectations of their constituencies**. Positioning **intersectional equality as a way to respond to diverse staff and student needs** can align equality initiatives with their leadership agendas.
- Intergenerational relations were identified as a promising entry point to discuss intersectionality with senior leadership. As workplaces become increasingly diverse and younger generations bring different expectations, working cultures, and values, top managers are **seeking ways to maintain cohesion and productivity across generations**. Framing intersectionality in this context **can open constructive dialogue about broader diversity dimensions, including gender, ethnicity, class, and disability**.

Group 2: Strategies from, and for, middle management



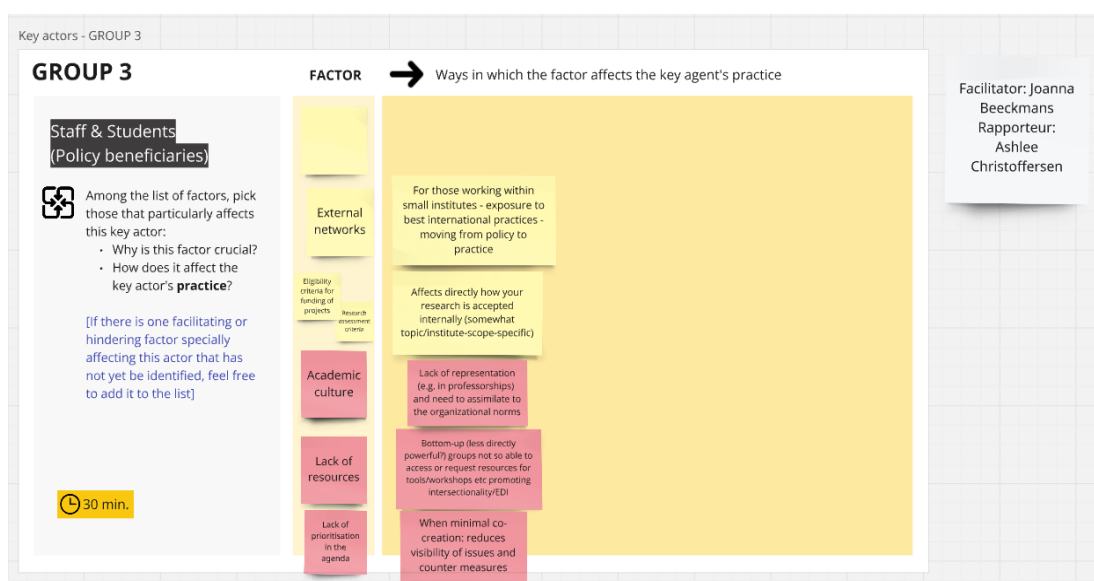
Participants considered **middle managers as crucial stakeholders**, as they are responsible for, or involved in, the implementation of intersectional equality policies. However, three main issues were raised that might explain why middle managers do not (effectively) perform their role as policy implementers: they might not see the importance of intersectionality and equality policies; they might not have a clear idea of what intersectionality means or what it entails; and they might not know how to effectively implement the policies and “do” intersectionality. Hence, strategies were shared in which middle managers can perform the role of implementer, **to avoid that even the best-designed organizational policies might not lead to real change throughout the entire organization**.

- A first crucial facilitating factor that was discussed is their expertise or prior familiarity with intersectionality. As not all middle managers have this, it can be **important for organizations to support them through developing clear definitions, glossaries and localized narratives on intersectionality**. This can make it clear **how these concepts**

should be understood “in general”, as well as how they are connected to the local organizational and societal context. Moreover, this provides middle managers with a language to discuss the issue in their departments.

- Participants further mentioned the importance of organizational support initiatives, guidance, and structures to ensure **coordination between middle managers and other actors**. This support and guidance can provide them the necessary knowledge to understand how to “do” intersectionality in practice.
- Participants acknowledged that the implementation of policies by middle managers is determined by the degree to which they see it as important, experience ownership and are held accountable for their implementation efforts. Ensuring middle managers take their responsibility as implementers seriously can involve **connecting intersectionality to legislation, to a core function of the institution (e.g., research and research funding), and collecting data**. Intersectionality data might not only alert them to **why the issue is important, but also** allow them to be **held accountable**.
- Ensuring that middle managers can take their responsibility not only requires holding them accountable, but also providing them with the support they need. This not only means **providing supporting structures, guidance and definitional knowledge, but also sufficient (financial) and people resources**.

Group 3: Strategies from, and for, students & staff

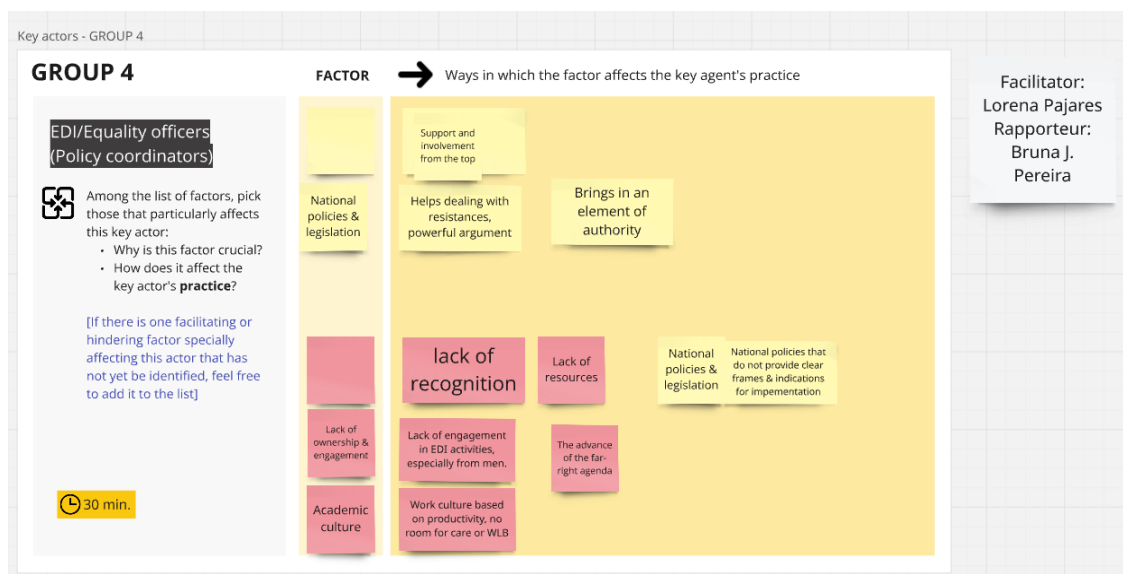


Participants emphasised that **students and staff are** not only the intended beneficiaries of intersectional equality policies but also **essential co-creators of these initiatives**. Their active engagement and lived experiences are critical for identifying gaps, shaping relevant actions, and ensuring that institutional change is both inclusive and sustainable.

- External networks** were highlighted as a key enabler, **providing spaces for exchange, peer learning, and mutual support** across countries and institutions. Such networks are particularly valuable for smaller institutes that often lack internal capacity or expertise, as they offer access to models of good practice and practical insights on translating policy commitments into everyday institutional practices.

2. Research assessment criteria were identified as they often privilege specific disciplinary norms or traditional career trajectories, which inadvertently reproduces inequalities, limiting recognition for intersectional or community-engaged work. This underscores the need to **align research assessment and funding mechanisms with equality objectives**, ensuring that intersectional contributions are valued and supported.
3. Participants noted that existing **academic norms and reward structures often remain unchallenged by institutional policies, while these are core to institutional change**. These norms tend to perpetuate exclusionary patterns, whereby women and ethnic minorities are often not represented at the institutions but especially, those who succeed or stay, are often those who assimilate into dominant academic cultures rather than transform them. A way to overcome this was by having governance structures that **systematically consult multiple constituencies, and recognize the experiences of minoritized groups to actually rethink who gets to succeed** e.g. as a professor and to identify which structural barriers are now present that hamper this. The recognition and remuneration of equality work, which is often treated as voluntary and emotionally laden, can contribute to changes in how promotion criteria are designed to assess career advancements.
4. Participants noted that students and staff from minoritized groups frequently lead equality activities on a voluntary basis and with limited resources, organising workshops or awareness events without sufficient institutional support. This dynamic not only risks burnout but can also create tensions between groups competing for scarce opportunities. Participants stressed **the importance of allocating resources to participatory, bottom-up initiative and redistributes the power to act**.
5. Finally, the lack of institutional prioritisation of intersectional approaches was seen as a persistent barrier. In many contexts, co-creation of policies remains minimal, leaving crucial issues invisible or only superficially addressed. Participants argued that **intersectionality should become a continuous institutional practice rather than a one-off policy exercise**. This requires time, commitment, and the development of adaptable guidelines informed by diverse institutional contexts and best practices.

Group 4: Strategies from, and for, EDI officers and managers



Participants underscored the central role of **Equality/Equity, Diversity and Inclusion (EDI) managers as intermediaries between policy, leadership, and the academic** community to translate institutional commitments into practice and in maintaining the momentum for structural change.

1. Support and involvement from top management were consistently identified as decisive enabling factors. When leadership actively endorses equality work, intersectionality becomes recognised as a shared institutional responsibility rather than an isolated concern delegated to individual officers. **Visible support from presidents, rectors, and senior administrators lends strategic weight to equality policies and practices**, helping to spread the support across departments .
2. The advance of the far-right movements and the mainstreaming of discriminatory discourses threatens the legitimacy of equality policies. In such contexts, intersectionality and gender equality are increasingly framed as “political” or “ideological”, exposing EDI officers and initiatives to heightened scrutiny and, in some cases, hostility. **National laws and European requirements** can provide the external mandate EDI managers need to **justify their work, overcome internal resistance, and mobilise action** within hesitant or conservative environments. Such external frameworks reinforce institutional accountability and strengthen the position of equality professionals in advocating for change.
3. Participants highlighted the lack of ownership and engagement as one of the most significant challenges, as it limits the scope and sustainability of equality initiatives. Efforts to broaden participation often encounter resistance, particularly among men and senior academics who may not perceive equality work as relevant to their roles. Hence, **engaging actors that might in the first place feel unaffected by the intersectional initiatives and working in tandem with EDI managers might reinforce the buy-in** and the transformative potential of intersectional equality policy-making on the long term.
4. Participants noted time constraints as a big issue as equality work is often added on top of existing workloads without sufficient recognition or structural support. This issue is deeply intertwined with the academic culture, which prioritises productivity and research output over community engagement. **Recognizing that equality work is labour and rethinking who “fits in academia”**, such as staff with caring responsibilities, disabilities, or non-traditional academic trajectories, **provides an entry-point to widen the participation** of different actors in the intersectional equality policy-making.

3. KSH3 experts' and CoPs reflections

Ashlee Christoffersen

This paper offers important empirical insights into intersectionality's emergent application in HE&R policy in Europe.

It is notable that institutions having prior gender equality policies has been observed as both a facilitator of intersectional policies (acting as a springboard into intersectional policy making), AND as a barrier to intersectional policy making (persisting dominance of gender). Observations as to dominance of gender being a barrier have also been made in other contexts outside the EU (e.g. Canada, (Christoffersen & Hankivsky, 2021), so conceptualising pre-existing gender policy as a barrier (rather than a facilitator) is the observation that is most aligned with the literature (see also (Hunting & Hankivsky, 2020). Gender is the most powerful 'silo' in European policy (Christoffersen, 2023; Christoffersen & Emejulu, 2022), promoted to the exclusion of consideration of race in some contexts during discussion of implementation of EU gender directives nationally, by white feminist political actors, who argued (incorrectly and problematically) that gender equality is both more important and more intractable (Christoffersen & Siow, 2025). More recently, the way that intersectionality has been appropriated by the field of 'gender', and emptied of essential attention

to race in the process, has received substantive critique (e.g. Bilge, 2013, and the ways that intersectionality is often practiced by the gender (women's sector, gender equality policymakers) have been observed to actually uphold racial inequalities (Christoffersen & Emejulu 2022). With this context in mind, **I would suggest that whether gender equality policies are an enabler, or a barrier (with those invested in them resisting intersectionality) to intersectional policymaking, is largely dependent on factors including a) the diversity of the team of those responsible for EDI (beyond white women); and b) the extent to which the team has knowledge, experience, skills in antiracism. Therefore, interventions to address these two issues of team diversity and knowledge of antiracism would be beneficial to mitigate this barrier.**

Bruna Cristina Pereira

In my view, the document adequately serves its purposes and present crucial aspects of the debate. I have only a couple of comments.

First, there seems to be a slight inconsistency: the document employs both language employing a more structural approach to intersectional inequality (for instance, in centring the analysis on power relations) and an individual approach (when mentioning social identities).

In my opinion, a more relevant recommendation is that **the paper focuses on the main problem pointed out, in terms of difficulties: implementation.** It begins by describing advances in terms of policy design and governance, while pointing that, even so, implementation of intersectional approach has remained informal, at best. I think the paper would benefit from **clearly stating this as the main problem, describing how and why it occurs** (gatekeeping by fear of 'diluting' gender – probably by White women?; **lack of participatory mechanisms that include the intersectionally minoritized**; middle-management 'ignorance' – why have my doubts if it is really ignorance or lack of interest – etc.), **and what could be done to address the problem** (participatory policy-making mechanisms, for instance).

Barbara De Micheli

The INSPIRE experience, through its CoP activities and knowledge exchange occasions, shows that the implementation of intersectional policies within HE and Research organizations is possible, although concrete experiences may differ from those designed in (only) theoretical elaborations and **a flexible definition of intersectionality is needed to welcome and value different kinds of experience, policies and initiatives.** The other element that emerges quite clearly from CoPs different experiences is that, **in order to promote organizational change, power dynamics need to be the focus of any action and, consequently, key relevant stakeholders need to be involved in the different steps of the process.** Even in those organizations where a bottom-up approach pushes for questioning the system and defining a more inclusive environment, leading groups must be involved to activate and implement an effecting, and lasting, process of change. **However, the leadership support is not enough: to promote intersectional policies is to promote cultural change and the engagement and commitment of different groups within the organization proves to be a key asset, while adequate resources (in terms of time and energy) need to be dedicated to open up conversations on inclusion and intersectionality issues** with all the organizational members, including also those that perceive themselves as not concerned by exclusion dynamics. Collecting and sharing data is a crucial approach when building the case for EDI initiatives within the organization, and it also important to build a new narrative showing in which ways a more inclusive approach can be beneficial, in terms of increasing the wellbeing and the quality of working life, for everyone in the workplace.

Irina Lungu

From my perspective, this paper brings **awareness to the several categories of stakeholders to be held accountable and consequently responsible for the implementation of intersectionality from policies to governance, including monitoring.** Moreover, I'd like to highlight the **different approach in terms of governance between universities and research institutes;** (1) the **different statutes of researchers** in these two types of institutions, (2) different levels of power given to middle management, and (3) **different intersectionality emergences**, through the influence factors between European regions, **from East to West, and North to South.** The paper's identification of the relevant qualitative monitoring KPIs is sensitive to the PEST (political, economic, social and technological) context/framework and therefore, I suggest that **external audits may bring more perspectives than the internal ones, providing feedback for improvement and re-assessment of the implementation stage.**

Intersectionality for Change CoP: Mirelur González-Oronoz (University of Deusto)

Within the Intersectionality for Change CoP, we began our work by focusing first on **agreeing a shared definition of intersectionality** that moves beyond siloed, single-axis approaches and explicitly incorporates the tackling of power imbalances as a central criterion. We also identified the most common or visible axes of discrimination within our universities, so that this mapping can serve as a cross-cutting foundation for the work of the other teams.

Secondly, we **analysed existing policies and plans to locate “traces of intersectionality” in organizational goals and implementation practices**, noting that in some institutions intersectionality is named explicitly, whereas in others implicit approaches are evident without using the term which reinforces the need to distinguish between language, intent and effective capacity for delivery.

In the area of contextual barriers and facilitators, I argue that **sustained and visible support from senior leadership is only secured when commitment goes beyond rhetoric.** Commitments need to be translated into institutional practices **through clearly defined responsibilities, a dedicated budget and adequate human resources** to ensure that intersectional equality is not delegated solely to EDI teams. In this regard, it is also crucial that EDI officers have career progression pathways that enable them to move into leadership roles.

I further propose **mandatory, in-person annual training for senior leadership, using a practical, experiential methodology that combines reflection on one's own positionality with learning through direct engagement with diverse people's experiences.** In the same vein, I maintain that challenging academic hierarchies and exclusion-reproducing norms requires a shift in university institutional culture that is not confined to the local level but is broader in scope. Moreover, **equality work needs to move beyond the reliance on invisible academic labour and towards its visibility, valuing and recognition.**

Finally, in the area of governance and implementation, we observe within the CoP that the **resources allocated to participatory, bottom-up initiatives led by staff and students** remain insufficient, particularly in terms of human resources. This undermines their sustainability and limits their role as essential co-creators in the design and implementation of intersectional policies.

WISE CoP: Sara Mas Assens (Responsible of Impact and Responsible Research and Innovation (RRI) Office, Strategy Department at VHIR) & Víctor Royo Calavera (Project Manager of Impact and Responsible Research and Innovation (RRI), Strategy Department at VHIR)

From the perspective of the WISE Community of Practice (CoP), the working paper is especially significant because it moves the discussion on intersectionality beyond normative commitments and policy rhetoric, focusing instead on how intersectionality is actually organized, operationalised, and sustained within Research and Innovation (R&I) contexts. This emphasis closely reflects

WISE's own experience as a CoP working at the intersection of health research, innovation, policy, and institutional practice.

Firstly, the paper's understanding of intersectionality as both overcoming siloed, single-axis approaches and actively addressing power imbalances resonates strongly with WISE's approach to health ecosystem in research and innovation. WISE CoP members consistently observe that equality initiatives often remain fragmented (most commonly centered on gender alone) without sufficiently addressing how gender intersects with other axes such as race, ethnicity, class, disability, sexual orientation, or migration status in the field of healthcare and health research. The paper's framing validates WISE's concern that without **an explicit effort to dismantle these silos, equality and inclusion policies** risk reproducing partial or exclusionary outcomes, even when well-intentioned in the field of health research.

Secondly, WISE CoP particularly values the paper's focus on "the doing of intersectionality" through policy design, governance, and implementation. In practice, WISE members frequently encounter institutional contexts where intersectionality is acknowledged at the level of discourse but struggles to translate into concrete actions, monitoring mechanisms, or accountability structures. The identification of "traces of intersectionality" is therefore a useful and realistic analytical lens for WISE, as it allows institutions to **recognise incremental progress, emergent practices, and informal strategies that may otherwise remain invisible or undervalued**.

At the same time, the paper's identification of facilitators and barriers mirrors many of the structural challenges faced by WISE CoP members. Limited resources, uneven managerial support, lack of intersectional data, and political or ideological resistance are recurring obstacles that constrain the transformative potential of intersectional equality policies in the health ecosystem. WISE CoP recognizes that these barriers are rarely isolated; rather, they interact across organizational, national, and European levels, reinforcing the need for **coordinated strategies and collective learning spaces such as Communities of Practice**.

Finally, WISE CoP strongly aligns with the paper's emphasis on participation and governance as central dimensions of intersectional policy-making. From WISE's perspective, **meaningful participation must go beyond symbolic inclusion and ensure that minoritized voices are not only present but also empowered, resourced, and able to influence decision-making processes over time**. Without addressing the unequal distribution of time, recognition, and institutional power, participation risks becoming tokenistic and counterproductive.

OpenEU CoP: *Esther Dominguez Ramirez (Project officer Equality Diversity and Inclusion Unit at Universitat Oberta de Catalunya (UOC)).*

From the perspective of the OpenEU Community of Practice (CoP), the paper's analytical strategy of identifying "traces of intersectionality" is particularly useful. By focusing on what is concretely being done—what practices emerge, what seems to work, and what appears to fall short—the paper provides a pragmatic lens to assess intersectional policy-making without relying on idealised or abstract benchmarks.

The working paper's explicit focus on "the doing of intersectionality" is particularly valuable, as it moves beyond discursive or symbolic commitments towards an empirical examination of how intersectionality is actually enacted—or fails to be enacted—within higher education and research organizations. Although intersectionality has been present in policy discourse and narrative, it often struggles to be translated into sustained institutional practice. **When intersectionality is reduced to a symbolic or compliance-oriented approach and detached from its critical and transformative raison d'être, it risks reinforcing existing power structures rather than challenging them, ultimately jeopardising meaningful organizational change.**

Policy design, governance and participation

At the same time, our work on participation—and more specifically on the participation of minoritized groups—raises concerns about the risk of tokenisation. Too often, **minority groups** are ‘included’ merely to fulfil representational requirements, rather than being **meaningfully involved through long-term, trust-based relationships grounded in a genuine institutional commitment to intersectionality**. This is a risk that is important to reflect upon, whether participation is driven by authentic engagement or reduced to a compliance “tick-box” exercise—whether internally or externally motivated—has significant implications for the transformative potential of intersectional policies.

Closely connected to this is the question of who is able to participate, and under what conditions. As highlighted in the paper, equality and intersectional equality work is frequently framed as voluntary or on-the-top-of work, despite constituting essential institutional work. Relying on the goodwill or moral commitment of minoritized staff, students, or civil society actors is neither sustainable nor equitable. Participation that is unpaid, informal, or unrecognized risks reproducing existing inequalities and undermines the very objectives of intersectionality.

Time, workload and unintended effects of intersectional measures

Time emerges as a particularly important dimension in this regard. Expectations that minority groups will contribute ‘for free’—for the collective good—ignore the **structural reality of time poverty, which disproportionately affects these groups**. Moreover, well-intended equality measures can sometimes have harmful effects. **For example, obligations related to parity or minority representation in doctoral or academic committees often fall repeatedly on the same individuals due to their underrepresentation**. This results in a disproportionate allocation of time to such commitments, frequently at the expense of research time, thereby reinforcing gendered and intersectional inequalities rather than alleviating them.

Diagnosis, data and evidence-based action

The paper’s emphasis on robust quantitative data and well-designed diagnoses is also highly relevant. **Systematic data collection is essential not only to make inequalities visible and to more easily engage top management by grounding discussions in empirical evidence rather than ideology, but also to establish a clear baseline from which targeted and context-sensitive actions can be developed**. Without such evidence, intersectional policies risk remaining vague, fragmented and out of frame.

External networks, learning spaces and institutional contexts

Furthermore, the importance of external networks and spaces for exchange, highlighted throughout the paper, is closely aligned with the OpenEU CoP experience. Within the OpenEU alliance—that brings together ten European universities—**collaboration around Inclusive Gender Equality (IGE) has proven instrumental in accelerating learning processes, particularly for institutions at earlier stages of inclusive gender equality policy development**. According to several CoP participants involved in the design and implementation of equality measures in their institutions, **this collective work has enabled faster and more effective progress in gender equality in general, as well as helped broaden the scope of equality from a predominantly gender-focused approach towards a more integrated and inclusive understanding grounded in an intersectional lens**.

Conceptual clarity, contextualization and building shared understanding

Finally, the recurring discussions within the OpenEU CoP reflect the paper’s emphasis on the need for conceptual clarity around intersectionality—both in general terms and in its concrete operationalization. **Clarifying how intersectionality is to be understood, deployed, and adapted to specific institutional and societal contexts remains a continuous and iterative process** for us as a CoP. This **ongoing back-and-forth between theory and practice is not a weakness, but rather a necessary condition for embedding intersectionality as a living,**

context-sensitive, and transformative practice within higher education and research organizations. It is also essential for translating these concepts into operational terms, building a shared understanding and commitment among the whole of the university or organization, and establishing a strong foundation for effective intersectional policy design, implementation, and impact, while taking into account the lived experiences of both staff and students.

4. Conclusion

This working paper demonstrates that **organizing intersectionality in Research and Innovation (R&I) policymaking is less a matter of adopting an “ideal intersectional policy” than of sustaining coordinated, power-sensitive processes across policy design, governance, and implementation.** While intersectionality is increasingly recognized in EU policy frameworks, its translation into practice remains uneven, with implementation emerging as the most persistent bottleneck. The analysis shows that progress most often takes the form of “traces of intersectionality”: partial, incremental, and context-specific practices that challenge siloed approaches and begin to address structural power imbalances.

The findings of both the case studies and break-out rooms underline that **intersectionality must be treated as an organizational practice** rather than a symbolic commitment on paper. Effective organization of intersectional equality work **depends on aligning external mandates** (such as legislation and funding requirements) **with internal political strategies, including leadership engagement, cross-cutting governance structures, participatory mechanisms, and adequate resourcing.** The extent to which current gender equality policies can serve as important entry points for intersectional policymaking is dependent on the ways in which such policies critically rethink and rework policymaking processes **to avoid reproducing single-axis dominance** and when **complemented by expertise** in anti-racism, gender equality and all other dimensions of inequality.

The working paper further highlights that **meaningful intersectional policymaking requires shared ownership across institutional actors** (top and middle management, EDI professionals, staff, and students) **supported by clear accountability, data-informed policies, and recognition of equality work as core institutional labor.** Communities of Practice and safe(r) spaces for knowledge exchange play a crucial role in enabling legitimacy and reflexivity across contexts. Ultimately, **organizing intersectionality in R&I policymaking is a long-term, iterative process of institutional change that centers power relations, centers participation, and prioritizes those most marginalized as a pathway to more inclusive and socially just higher education and research organizations.**

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