FINANCIAL PRODUCTS AND SERVICES FOR WOMEN'S FINANCIAL INCLUSION: A POLICY AND REGULATION DESIGN TOOLKIT
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1. INTRODUCTION

RATIONALE FOR THE TOOLKIT

Women constitute almost 50 percent of the world’s labor force.\(^1\) Globally, 89 percent of women are in charge of day-to-day household spending, and women bear 80 percent of the healthcare expenditures.\(^2\)

Saving and having the ability to use savings has a direct impact on women’s empowerment and, by extension, household well-being. Supporting greater levels of financial inclusion of women benefits not only individual women but also their children, families, and broader communities.

Yet, women across the world are disadvantaged in terms of the provision of financial services. Despite their multiple roles as household managers, caregivers, entrepreneurs, workers, business leaders, etc., women are often not considered a specific user segment in the design of financial services. Most financial policies and products and services are gender-neutral or even gender-blind. Consequently, they disregard sociocultural norms restricting women’s mobility, ownership, agency, and usage of financial products and services. Without this perspective, financial policymakers and designers of financial products and services remain largely unaware of the needs of women customers from different conventional or Shariah-compliant financial products (deposits, savings/investments, credit, insurance, pensions).

The availability and usage of gender-sensitive financial products and services is important. It may enable women’s asset-building and agency over their financial resources. This is crucial to bringing them, their families and ultimately, their communities out of poverty.

It is only now that financial regulators and policymakers are beginning to recognize the importance of understanding the different sub-segments of the women’s market to develop appropriate financial policies to support their inclusion. Promoting women’s financial inclusion and creating an enabling environment for economic empowerment can lead to positive macroeconomic outcomes which can put global and national economies on a higher trajectory of stable economic growth. Giving women access to suitable financial products and services can help to keep the 6 percent gender gap in formal account ownership from widening.

OBJECTIVE OF THE TOOLKIT

This toolkit is designed to provide practical guidance to policymakers and regulators in formulating, designing, and implementing gender-transformative policies that facilitate an enabling environment for the development and delivery of affordable and suitable financial products and services for the different segments of the women’s market. It also includes guidance for the gender-sensitive monitoring and evaluation (M&E) of such policies and their gradual impact.

Finally, this toolkit is intended for financial service providers (FSPs) looking to understand better the financial needs and behaviors of the women’s market and its sub-segments to develop/redesign their products and services to better serve women clients.

TARGET AUDIENCES FOR THE TOOLKIT

This toolkit is intended to support the following:

1. Financial policymakers and regulators planning to formulate new gender-transformative policies
2. Financial policymakers and regulators planning to reformulate gender-blind and/or gender-neutral policies into gender-transformative
3. FSPs that are planning to develop gender-sensitive products, services, and channels.

HOW TO USE THE TOOLKIT

The toolkit provides step-by-step financial inclusion guidance to financial policymakers, regulators, and FSPs, highlighting relevant experiences from the AFI member network. It comprises two parts:

1. Part 1 targets policymakers and regulators from financial and other sectors of the economy. It entails a strategic and an operational framework, collectively termed Growth Framework. While the strategic component provides guidance to understand, identify, and create a women’s market and its various sub-segments, the operational component assists in incorporating priority areas into the policy lifecycle phases of i) pre-formulation, ii) formulation, and iii) implementation. Policymakers and regulators should apply the two components of the Growth Framework in tandem.

2. Part 2 aims at FSP/non-FSPs and guides them in developing appropriate products and services for women.

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2. GENDER-TRANSFORMATIVE CONTINUUM

FIGURE 1: GENDER-TRANSFORMATIVE CONTINUUM

POLICY MAKERS’ FOCUS AREAS

GENDER-BLIND; GENDER-NEUTRAL POLICY
- Policies assume same set of challenges, patterns of access/usage of financial services for all genders.
- Women need to take extraneous steps to get access to financial services than men.
- M&E frameworks are not built to consider use of financial services by women.

GENDER-AWARE; GENDER-SENSITIVE POLICY
- Laws and regulations for financial services formulated with gender sensitive lens.
- Regulations designed to address social norms that constraint access to financial services for women.
- M&E frameworks designed to assess gendered impact of policies, products and services.

GENDER-TRANSFORMATIVE POLICY
- Access to financial services is simplified for women.
- Policy initiatives are taken to bolster growth of women entrepreneurs.
- SDD is a public good and FSPs are encouraged to use data trends to innovate for women.

FIGURE 1: GENDER-TRANSFORMATIVE CONTINUUM
Products assume similar needs, patterns of access and usage of financial services across all users.

Product use-cases are based on the mass market (typically male) and stereotype roles of women.

M&E frameworks are not built to consider use of financial services by women.

FSPs identify women as distinct user segment and develop targeted financial products & services.

Delivery channels are made gender sensitive to ensure hassle free journey for women.

Capacity building for women staff/customer is undertaken as a value add. Women are employed in positions of decision making.

SDD is collected at operational level. Trends are used to design gender inclusive products.

Women are able to access and use higher order financial products with ease and greater confidence.

Monitoring and evaluation frameworks designed to assess gendered impact of products on women’s lives.

GENDER-TRANSFORMATIVE PRODUCTS

GENDER-AWARE; GENDER-SENSITIVE PRODUCTS

GENDER-BLIND; GENDER-NEUTRAL PRODUCTS

FSP & PRACTITIONER FOCUS AREAS
It is important to closely analyze the gender-inclusiveness of current policies in the country, before embarking on policy initiatives to support gender-inclusive finance and drafting more impactful ones.

Typically, the policies in a country evolve from gender-blind to gender-transformative. However, some policies might also be more gender-sensitive vis-à-vis others. It is recommended that policymakers and FSPs consider the concept of the Gender-transformative Continuum described in Figure 1.

A set of characteristics defines each stage of the Gender-transformative Continuum. Only some countries will have a linear progression in the evolution of policies from gender-blind to gender-transformative. Rather, progression will depend on the priorities of the government and policymakers to bring the desired change, the ease with which such changes could be brought about (legislative amendments, circulars, policy modifications), and considerations for the time changes need to implement. Several factors, such as the country’s national goals, commitments made in the national financial inclusion strategy (NFIS), and the NFIS action plan, may also determine the priority policy areas for regulators.

The Gender-transformative Continuum presents a ready guide for regulators and FSPs to:

- assess where they stand in terms of gender-centric policymaking
- identify policy areas where gender-mainstreaming should be undertaken and
- develop a plan to bring a gendered perspective to develop more inclusive policies.

While this Gender-transformative Continuum is not designed to be an objective assessment, it can certainly enable regulators to make informed decisions on initiatives to focus on going forward. Figure 2 provides helpful steps to conduct a self-assessment and develop a policy action plan.

Once these steps are implemented, Figure 3 provides an overview of the assessment of the stage reached in the Gender-transformative Continuum.

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**FIGURE 2: STEPS TO DEVELOP A GENDER-INCLUSIVE FINANCIAL INCLUSION POLICY ACTION PLAN**

<table>
<thead>
<tr>
<th>1. UNDERSTAND</th>
<th>2. ASSESS</th>
<th>3. CONSULT</th>
<th>4. CREATE</th>
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<tbody>
<tr>
<td>Refer to the definitions of gender terms used in three stages of the Gender Continuum. Understanding these terms and the Gender Continuum will provide a reference point for regulators to assess their policies.</td>
<td>Assess how financial inclusion policies fare in the three stages of the Gender Continuum. Refer to Figure 3 for the self-assessment questions. Remember, the Gender Continuum is not linear. A country may have tiered KYC norms to enhance women’s financial inclusion indicating a gender transformative policy; However, its customer protection policies may be gender-neutral/blind.</td>
<td>Based on the results from the self-assessment, consult with relevant stakeholders to identify policy area(s) which the regulators want to move along the Gender Continuum. Agree on an overarching timeframe to move from the current stage to the desired state in the Gender Continuum. Create a time-bound roadmap to integrate a gender lens in existing financial inclusion policies. Develop an objective plan for what still needs to be achieved in terms of enabling gender equitable outcomes for financial inclusion.</td>
<td></td>
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</tbody>
</table>
FIGURE 3: ASSESSING THE STAGE OF VARIOUS POLICIES ON THE GENDER-TRANSFORMATIVE CONTINUUM

<table>
<thead>
<tr>
<th>GENDER-BLIND</th>
<th>Does the policy consider same set of opportunities and challenges for all genders?</th>
<th>Do women take extraneous steps to get access to financial services?</th>
<th>Are patterns of access to financial services perceived the same for all genders?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are the needs and behaviors of men and women regarding usage of financial services seen as same?</td>
<td>Do women take extraneous steps to get access to financial services?</td>
<td>Have the governance and implementation arrangements for policy been drawn without considering the inclusion of women?</td>
<td>Is the policy’s M&amp;E framework gender agnostic?</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>GENDER-SENSITIVE</th>
<th>Are financial inclusion policies designed taking into account the gender of the end beneficiary?</th>
<th>Are the laws and regulations pertaining to financial inclusion enacted with a gendered lens?</th>
<th>Does the government or the policymaker undertake initiatives to understand social norms that constrain access to financial services for women?</th>
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</table>

<table>
<thead>
<tr>
<th>GENDER-TRANSFORMATIVE</th>
<th>Have the policymakers identified the challenges women face in accessing financial services?</th>
<th>Do market stakeholders (such as FSPs) recognize the need and benefits of targeting the women’s market?</th>
<th>Is the institutional infrastructure designed to incentivize women clients?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do policymaking institutions and FSPs have adequate capacity to collect, analyze, and use SDD?</td>
<td>Is the policy communication tailored to the needs of women users?</td>
<td>Are M&amp;E frameworks in place to track progress of FSPs in developing gender sensitive products/services?</td>
<td></td>
</tr>
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</table>

Note: Annex 1 provides an indicative self-assessment tool based on the Gender-transformative Continuum.
3. PART 1: TOOLKIT FOR POLICYMAKERS

While developing gender-inclusive policies for the financial sector, policymakers often need help with what to include while formulating gender-inclusive policies and how to formulate gender-inclusive policies.

Accordingly, the present toolkit for policymakers focuses on two components:

1. **Strategic component** dealing with ‘What to include’ while formulating policies.
2. **Operational component** dealing with ‘How to formulate’ policies and includes three phases of policy development (pre-formulation, formulation, and implementation).

Figure 4 shows the framework for gender-inclusive financial policy development and the interaction between the strategic and operational components.

**STRATEGIC COMPONENT: WHAT TO INCLUDE WHILE DEVELOPING GENDER-INCLUSIVE FINANCIAL POLICIES**

The strategic component focuses on the strategic aspects of financial policy and regulation that need to be considered by policymakers while formulating gender-inclusive policies.

**IDENTIFY**

**A. IDENTIFY WOMEN’S USER SEGMENTS AND THEIR UNIQUE NEEDS**

Many AFI member jurisdictions still have legislation and laws restricting women’s autonomous access to certain rights. These include identity documents, land ownership, travel restrictions, and other legal entitlements. Restrictive policies limit women in seemingly simple tasks, such as opening a bank account, accessing credit, or visiting a bank branch or an agent outlet. Consequently, they are prohibited from attaining economic autonomy. Some activities regulators can undertake to identify the women’s market and their specific needs are detailed below.

**Step 1: Identify** the legislation and laws in your country that directly or indirectly affect (women’s) financial inclusion. Some examples include national ID, property ownership, inheritance, and laws on women’s mobility outside of their homes. Regulators can also refer to the Women, Business and the Law to identify specific legislation and laws relevant to women’s rights. It would also be beneficial to map the financial inclusion policies and regulations of peer countries to draw comparisons and identify good practices if any.

**Step 2: Review** identified legislation and laws through a gender lens to understand whether they restrict or promote women’s mobility, agency, and access to financial services. This task can be undertaken internally if there is institutional capacity and appropriate skills or outsourced to an independent gender specialist. Figure 6 presents some guiding questions to assess financial inclusion legislation through a gender lens.

**FIGURE 6: ASSESSING FINANCIAL INCLUSION LEGISLATION WITH A GENDER LENS**

<table>
<thead>
<tr>
<th>Question</th>
<th>Guidance</th>
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<tbody>
<tr>
<td>1 How does the journey for women to open a bank account or mobile money account differ from that undertaken by men?</td>
<td></td>
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<tr>
<td>2 At what points along this journey do women face barriers?</td>
<td></td>
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<tr>
<td>3 What barriers are these? To what extent are these barriers the result of specific legal provisions?</td>
<td></td>
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<tr>
<td>4 What are the challenges for women to access national ID?</td>
<td></td>
</tr>
<tr>
<td>5 What are the challenges for women to open and/or use a bank account or a mobile money account?</td>
<td></td>
</tr>
<tr>
<td>6 What are the challenges for women to access credit?</td>
<td></td>
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<tr>
<td>7 How and to what extent can legislative action eliminate or reduce these hassles?</td>
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</table>

FIGURE 4: FRAMEWORK FOR GENDER-INCLUSIVE POLICY DEVELOPMENT

STRATEGIC COMPONENT (WHAT)

- Identify women user segments
- Predict user behaviors
- Create women’s market
- Partner to achieve greater impact
- Empower usage of financial services
- Protect users

OPERATIONAL COMPONENT (HOW)

PRE-FORMULATION
- Identify contours of the policy agenda
- Gather information from internal and external sources
- Review existing plans, legal frameworks, and policies
- Coordinate support from stakeholders
- Identify team members to work on policy development

FORMULATION
- Develop policy document
- Peer review the policy from a gender lens
- Develop a balanced and diverse governance structure
- Formalize public/private partnerships/collaboration

IMPLEMENTATION
- Communicate about the policy agenda with stakeholders
- Oversee policy implementation
- Develop an M&E framework and plan
- Institute a system for SDD collection, analysis, and reporting
- Conduct periodic assessment and independent reviews

FIGURE 5: STRATEGIC COMPONENT FOR GENDER-INCLUSIVE POLICY DEVELOPMENT

THE ICE-3P FRAMEWORK FOR GENDER-SENSITIVE POLICY:

- Identify women user segments
- Create women’s market
- Empower usage of financial services
- Protect users
- Predict user behaviors and trends
- Partner to achieve greater impact
Step 3: **Collaborate** with other relevant regulators, policymakers, and private players in the country to make suitable amendments to the legislation. It is also important to sensitize stakeholders new to the discourse on gender-oriented policies, products, and services, to help them incorporate gender considerations in their work.

Step 4: **Define** women as a separate target group while developing your NFIS and/or National Financial Education Strategy (NFES). These strategies should prescribe gender-specific goals and targets with realistic timelines and include a gender-sensitive M&E framework to measure progress. It is important that these exercises are done in close collaboration with key stakeholders responsible for implementing these strategies.

Step 5: **Collect and analyze** sex-disaggregated data (SDD) periodically through national demand-side surveys and regular supply-side SDD reporting. There is also an emerging opportunity to collect alternative data, such as digital transaction history, utility and other bill payments, and mobile payment history, primarily to understand the need for differentiated financial products and to assess creditworthiness. The collection and analysis of SDD in various fields related to women’s financial inclusion are crucial.

**CASE 2: WOMEN AS A TARGET SEGMENT IN THE NFIS OF SOLOMON ISLANDS**

Solomon Islands is the first country in the world to incorporate sex-disaggregated financial inclusion objectives and targets into their NFIS. The targets were first set in 2011 during the country’s first NFIS. The central bank’s belief that empowering women economically has benefits not only for the family but also for the community led them to identify women as a target segment. Solomon Islands adopted an action plan for its NFIS I (2011-2015) with measurable timelines and performance indicators under three focal themes: digital financial services, financial literacy, and community-based financial models. This has led to an increase in the status of financial inclusion of women in the country. The central bank has maintained this approach in its subsequent NFIS II (2016-2020) and III (2021-2025).

**Note:** AFI publication Policy Framework on MSME Data Collection: A Guide For Gender Inclusive Finance provides more detail on MSME data collection concerning gender-inclusive finance. > View here

**B. STANDARDIZE DEFINITIONS OF WOMEN-OWNED ENTERPRISES AND WOMEN BENEFICIARIES**

There is a considerable variation in definitions of women beneficiaries or women-owned or women-led businesses globally and at the national level. This makes identifying and mapping target segments/sub-segments of women extremely difficult. In addition, different stakeholders consider and interpret women-owned or women-led businesses differently. This has led to inconsistency, multiple-counting issues, and data repetition across different policymaking institutions in the country.

Standardized definitions ensure that various types of the ownership status of women-led enterprises are uniformly documented. In circumstances where some sectors or sub-sectors have already adopted distinct definitions, it would be beneficial to take stock of these definitions and harmonize them across all sectors so that a uniform definition can be endorsed at the national level.

**Defining women-owned enterprises**

Policymakers may take the following steps from Figure 7 to define women-owned enterprises. At the same time, Figure 8 below helps define registered and unregistered women-led and women-owned enterprises.
FIGURE 7: DEFINING WOMEN ENTERPRISES

**REVIEW**
... whether existing definitions of MSMEs apply to women-owned enterprises.
In practice, women-owned enterprises may differ from male-owned enterprises in ownership, revenues, employment generation, and capital expenditure.

**ASSESS**
... a sample of women-owned enterprises to understand the nature and scope of the businesses they are engaged.
For instance, most low-income women micro-entrepreneurs would be seen operating home-based businesses in the informal market.

**INCLUDE**
... businesses operating in the informal market in the standard enterprise definitions so that FSPs can segment women MSMEs enterprises operating in this space.

**DIFFERENTIATE**
... between ‘women-owned’ and ‘women-operated’ enterprises.
There are instances where the business is in the name of the female member, but a male household member runs the business and vice versa.
Defining the criteria of ownership and operational and management roles will enable FSPs to identify proxy owners/operators and offer relevant products and services.

**PRESCRIBE**
... realistic definitions for different categories of enterprises. This can be done using a data-driven approach.
SDD is a public good and FSPs are encouraged to use data trends to innovate for women.

**GET BUY-IN**
... from other relevant policymakers/regulators/public and private sector entities on definitions so that their policies, guidelines, and databases can be suitably aligned.
Monitoring and evaluation frameworks designed to assess gendered impact of products on women’s lives.

**PUBLISH**
... these definitions making them available to all stakeholders in the ecosystem.
The products must work to onboard more women to formal financial services. This calls for a gender-transformative financial services ecosystem and an enabling policy and regulatory environment.

A. IDENTIFY THE SCOPE FOR GENDER-TRANSFORMATIVE FINANCIAL INCLUSION POLICIES

Some activities regulators can undertake to develop gender-sensitive, and gender-transformative policies for the women segment are discussed below.

Step 1: Collect SDD from both the demand- and supply-side to identify specific categories of challenges women face in accessing and using formal financial services, as shown in Figure 10.

Step 2: Review and assess existing banking and financial inclusion policies based on the analysis conducted in Step 1. Each challenge can be mapped to one or more policy areas, which can help regulators develop a plan for the desired policy modification. Some guiding questions to develop a policy modification plan include:

> What steps must be taken to modify the given policy?
> What indirect/direct and enabling/influencing role(s) can the relevant regulator(s) play in modifying the policy?
> In which areas FSPs require support and guidance in catering to the women’s market?

Step 3: Act on identified policy areas by modifying or creating new ones and, for example, simplifying KYC requirements so that women can be easily onboarded into the formal banking system.

CASE 4: IMPACT OF TIERED KYC IN GHANA

The access to e-money accounts increased from 41 percent to 58 percent from 2014-2017 in Ghana. This is partly attributed to the tiered KYC norms for non-banks introduced by the regulator in conjunction with mobile money regulations. The new KYC system lowered documentation requirements for entry level, low value accounts.

FIGURE 9: DEFINING WOMEN BENEFICIARIES FOR VARIOUS PURPOSES

Beneficiaries are defined for the purpose of designing government-led/donor-led development schemes.

Beneficiaries are identified and targeted based on the value they seek and use cases they generate. If done correctly, product marketing can help onboard women sustainably.

Beneficiaries are identified based on their roles and life moments, as well as their needs at different lifecycle stages, to develop targeted products.

FIGURE 10: CHALLENGES WOMEN FACE IN ACCESSING FINANCIAL SERVICES

DEMAND-SIDE BARRIERS
Limited education and awareness about financial services leads to low product uptake.

Limited information about grievance redress results in apprehension about using products.

Limited information about charges makes women vulnerable to overcharging or other fraud.

SUPPLY-SIDE BARRIERS
Limited understanding of the women’s market and its challenges.

Lack of capacity to design gender-specific, convenient and cost-effective services and products.

Poor marketing of financial products and services targeted at women users.

STRUCTURAL BARRIERS
Limited means to tap into the financial services infrastructure due to lack of IDs, mobile phones, etc.

Lack of champions among employees to serve women clients at bank branches and access points.

Poor marketing of financial products and services targeted at women users.

SOCIETAL BARRIERS
Sociocultural and religious barriers limit women’s mobility leading to limited access to:
> open an account
> make transactions
> use higher-order banking products.

Limited agency with women to identify use cases that might help organize their financial lives.

BEHAVIORAL BIASES
Low confidence in learning a new skill, especially digital financial services.

Loss aversion bias when dealing with technology and/or transacting at multiple access points.

Anchoring bias makes any hassle in the journey eclipse the entire experience with formal financial services.
B. BUILD ENABLING ENVIRONMENT FOR WOMEN ENTREPRENEURS

Regulators and policymakers must create an enabling ecosystem for women entrepreneurs to boost income at the individual level. Consequently, this would contribute to macroeconomic stability at the country level. Some activities regulators can undertake to create an enabling ecosystem for women entrepreneurs may include the following.

Step 1: Identify common constraints faced by women-owned enterprises, such as:

- Business registration and compliance requirements are tedious, and the process is time-consuming. Women entrepreneurs in the informal sector often lack the resources to comply with these.
- Typically, women entrepreneurs are ‘thin-file’ customers with limited formal credit history. Financial institutions are hesitant to lend to them, stifling their business growth.
- Discriminatory sociocultural norms in many jurisdictions prevent women entrepreneurs from gaining better access to business networks like their male counterparts. This results in a lack of confidence in tapping into larger markets.

Step 2: Ease entry barriers for women wanting to start their businesses by simplifying licensing, registration, and record maintenance procedures in proportion to the size and nature of the businesses at different intervals.

Step 3: Develop institutional infrastructure to support women entrepreneurs. Figure 11 presents some ways in which regulators can develop institutional infrastructure.

FIGURE 11: TOOLS TO EVALUATE EFFECTIVENESS OF LITERACY PROGRAMS FOR PARTICIPANTS

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<tr>
<td>1</td>
<td>Develop a legal framework to allow acceptance of movable collateral and set up a functioning collateral registry.</td>
</tr>
<tr>
<td>2</td>
<td>Set up credit bureaus that collect financial and non-financial data to help women businesses access higher credit with better conditions.</td>
</tr>
<tr>
<td>3</td>
<td>Encourage FinTechs to develop data-driven solutions to assess the creditworthiness of WSMEs.</td>
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<tr>
<td>4</td>
<td>Support FSPs to use alternate credit scoring-based solutions to provide easier credit to WSMEs.</td>
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</table>

Step 4: Strengthen alternate banking institutions, such as microfinance institutions, savings and credit cooperatives, Sharia-based financial institutions, FinTechs, etc., to cater to the needs of women entrepreneurs. Figure 12 shows some ways to support such institutions.

Since they are not a homogenous group, there is no ‘one size fits all’ solution for policy development for women. Financial needs for women change as they progress through their lifecycle stages. In addition, those living in rural areas have very different needs compared to those in urban environments. Thus, policymakers must understand women’s needs and design appropriate financial policies and regulations. It would take a more conscious effort to move away from gender-neutral policies and towards adopting gender-transformative policies.

FIGURE 12: STRENGTHEN ALTERNATIVE FINANCIAL INSTITUTIONS FOR WOMEN USERS

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<tbody>
<tr>
<td>1</td>
<td>Develop clear guidelines for institutions such as MFIs, SACCOs, etc. to bring them within the purview of regulation and ensure their practices are gender sensitive.</td>
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<tr>
<td>2</td>
<td>Support alternative financial institutions to offer value-added and need-based services to women, including:</td>
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<tr>
<td></td>
<td>&gt; affordable financial products</td>
</tr>
<tr>
<td></td>
<td>&gt; non-financial services.</td>
</tr>
<tr>
<td>3</td>
<td>Guide alternative financial institutions to:</td>
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<tr>
<td></td>
<td>&gt; collect SDD and build institutional capacity to analyze it</td>
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<tr>
<td></td>
<td>&gt; understand trends in women’s access and usage to predict behavior patterns and future product needs.</td>
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EMPOWER

Women with access to finance and information are more empowered to take charge of their financial lives, thereby contributing to the well-being of their households and wider communities. As a gendered concept, empowerment is rooted in sociocultural norms. Regulators play a key role in developing support systems for financial inclusion that enable women to use their financial education to access and use financial services and grow their businesses. Some ways in which regulators can empower women are discussed next.

A. DESIGN GENDER-SENSITIVE GOVERNMENT-TO-PERSON PAYMENT SYSTEMS

One way to generate a compelling use case for women is to leverage government-supported cash transfer programs. Women form a major proportion of beneficiaries in cash transfer programs through maternal and neonatal health benefits, nutrition, daily wage programs, education subsidies for children, pensions etc. The number of social protection programs has increased exponentially, especially after COVID-19. Some steps to design gender-sensitive government-to-person (G2P) programs are detailed below.

Step 1: Design G2P payments with the financial lives of women in mind. Understand how women currently gain access to government aid and the pain points on this journey. Typically, cash transfer programs consist of three components, as shown in Figure 13.

Step 2: Digitize cash transfers so that they are deposited directly to the bank accounts of women beneficiaries. While it does not ensure that the amount in the bank account is used only by the intended women beneficiaries, it does ensure that the intended beneficiary is the first point of access. Accessing money through their accounts at their convenience could empower women to conduct transactions more often.

CASE 5: G2P PAYMENTS IN ZAMBIA

Zambia’s GEWEL program supports women’s livelihoods (SWL) with life and business skills training, helps keep girls in school by supporting school fees, provides support to three ministries involved in the implementation of the project. The program introduced digital grant payments allowing beneficiaries to choose from six service providers.

This helped reduce travel cost and time, understand payment behaviors and perceptions, and enhanced the knowledge of access points.

This customer-centric approach increased the usage of financial services among women and reduced the cost of payments for the government. It also gave more control to the women beneficiaries in deciding which provider they would like to transact with, encouraging them to be more active in the formal financial economy.

FIGURE 13: COMPONENTS OF G2P CASH TRANSFER AID PROGRAMS

- Linked to certain pre-conditions (conditional cash transfer)
- Paid directly to the end recipient for a particular aid, such as school fees paid directly to schools
- Given without pre-conditions attached (unconditional cash transfer)

Each scenario has a separate journey for beneficiaries, which must be assessed through a gender lens.
Some prerequisites for digitizing cash transfers are:

1. Simplify account opening for women so that they have a channel to receive the aid amount,
2. Establish communication mechanisms so that women know when the aid amount has been transferred,
3. Develop a robust digital system that enables government agencies to readily identify women beneficiaries through unique IDs, link their bank accounts, and transfer the requisite amount.

**B. FINANCIAL EDUCATION AND LITERACY TO EMPOWER WOMEN WITH INFORMATION, KNOWLEDGE, AND SKILLS**

**Step 1: Develop** a NFES or incorporate it as a priority area in the NFIS. However, having a stand-alone financial education strategy helps to focus on education as a key pillar in addressing the gender gap in financial inclusion. When developing a gender sensitive NFES, regulators are encouraged to consider the following:

1. **Recognize** women and girls as a target segment across their varied roles as individuals, mothers, household managers and entrepreneurs,
2. **Streamline** how financial education is designed and implemented such that a large segment of girls and women can access financial education,
3. **Assign roles and responsibilities** for various departments and institutions so that financial literacy and education is a mainstream activity instead of an additional task. This brings the aspect of consumer education to the forefront and ensures that financial education is not just limited to product information but is a response to information and knowledge gaps identified among the target segments.

**Step 2: Design** the strategy with women’s economic empowerment in mind. Some aspects that regulators can consider include the following:

1. Keep the tenets of accessibility, relatability, and usability central to the content design, as in Figure 14.
2. Make sure interactions mirror real-life situations faced by women when designing interactive exercises.
3. Embed experiential learning for women in digital financial literacy programs so they overcome their fear of using technology.

**FIGURE 14: TENETS TO BE CONSIDERED IN FINANCIAL LITERACY AND EDUCATION PROGRAMS**

<table>
<thead>
<tr>
<th>Tenets</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accessibility</td>
<td>Assessment of training format in terms of method, mode, time, place, and training structure.</td>
</tr>
<tr>
<td>Reliability</td>
<td>Understanding the background of participants, including gender, occupation, household size, income levels, etc.</td>
</tr>
<tr>
<td>Usability</td>
<td>Assessing training outcomes and actions, such as the number of accounts opened and access to credit and other financial products.</td>
</tr>
</tbody>
</table>

**Step 3: Evaluate** the financial education programs both from the perspective of participants and programs. Participants’ knowledge can be assessed in multiple formats, as detailed in Figure 15.

**FIGURE 15: TOOLS TO EVALUATE EFFECTIVENESS OF LITERACY PROGRAMS FOR PARTICIPANTS**

<table>
<thead>
<tr>
<th>Tools</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre and post-training evaluations</td>
<td>to understand baseline assessment and changes brought about by the training.</td>
</tr>
<tr>
<td>Panel studies</td>
<td>to study behavior change due to training in a cross-section of participants over a period of time.</td>
</tr>
<tr>
<td>Group assessments</td>
<td>to understand the level of functional knowledge gained by participants.</td>
</tr>
</tbody>
</table>

Gender-sensitive M&E frameworks for training programs would enable program administrators to assess the impact of the programs, the effectiveness of training formats, the relevance of content, and the transfer of knowledge into actions. The following aspects can be evaluated:

- Knowledge and behavior of participants before and after training.

**See:** Guideline Note on Integrating Vulnerable Groups in National Financial Education Programs and Strategies.

> View here

**See:** Integrating Gender and Women’s Financial Inclusion into National Strategies (V.2).

> View here
FINANCIAL PRODUCTS AND SERVICES FOR WOMEN'S FINANCIAL INCLUSION: A POLICY AND REGULATION DESIGN TOOLKIT

CASE 6: NATIONAL FINANCIAL EDUCATION STRATEGIES IN AFI MEMBER INSTITUTIONS

Zambia has been implementing its National Financial Education Strategy II: 2019-2024 with the goal to have “a financially educated Zambian population by 2030.” Other countries, including Pakistan, Peru, and Malawi have also attempted to address financial literacy barrier through specific actions in NFIS or through stand-alone financial literacy and education strategies and initiatives. All these policies have identified women as a target segment and beneficiary of literacy initiatives.

The NFES (2019-2024) of the Bank of Uganda has established a working group for Forcibly Displaced Persons as part of its special interest group, one of five key target segments along with children below the age of 15 and people with disabilities. The other four working groups focus on other vulnerable market segments such as youth, women, rural, and workplace. The have also developed a Strategy for Financial Literacy.

Financial education is identified as one of the three key pillars to enhance financial inclusion in Nepal. The Nepal Rastra Bank stipulates that all banks and financial institutions spend five percent of their corporate social responsibility fund toward organizing financial literacy and education programs. Women have been identified as a key target segment for such financial literacy programs.

Sources:
AFI. 2022. Member series: Nepal’s financial inclusion journey towards access to finance, financial literacy and financial consumer protection.

C. BUSINESS DEVELOPMENT SUPPORT TO EMPOWER WOMEN THROUGH BUSINESS GROWTH

Step 1: Create opportunities for women’s businesses to access mentoring programs and business networks.

Step 2: Support aspiring women entrepreneurs through incubation and accelerator programs.

Step 3: Incentivize to scale their businesses from growth to maturity, as shown in Figure 16.


> View here

FIGURE 16: SUPPORT BUSINESS DEVELOPMENT FOR WOMEN ENTREPRENEURS

CREATE

... opportunities for women businesses to access mentoring programs and business networks.
... network institutions to support women entrepreneurs through business development training and networking events.
... partnerships with credit institutions for members of network institutions.

SUPPORT

... aspiring women entrepreneurs through incubation programs to support entrepreneurs in:
> validation of business ideas
> building scalable business models
> learning to manage business finances
> accessing seed money to pilot and subsequently launch a business.

INCENTIVIZE

... businesses to scale up from growth to maturity by:
> simplifying business registration for WMSMEs
> certifying members of business development institutions to avail of low-cost credit
> Educating women entrepreneurs on business needs, including licensing, taxation, etc.
CONSULTATIVE VETTING: EXTERNAL STAKEHOLDERS CAN BE CONSULTED TO UNDERSTAND THEIR CAPACITY AND CAPABILITY WITH REGARDS TO THEIR INVOLVEMENT IN THE POLICY DEVELOPMENT.

BOX 1: INDICATIVE LIST OF STAKEHOLDERS AND AREAS OF COLLABORATION

While mapping stakeholders, it is important to list out a complete list of stakeholders. The degree of consultation with stakeholders should be based on factors such as authority or jurisdiction of various policymakers, the nature and scale of policy intervention, level of involvement etc. Specifically, the following categories of stakeholders should be engaged:

- **Legislators and policymakers** to develop gender-transformative legal systems
- **Donors and development partners** to develop product, policy toolkits, guidelines, and design women’s market programs
- **Financial service providers, ministries, not-for-profit organizations and educational institutions** to develop communication strategies so that the end consumer has the right information about policies and products
- **Private sector partners** to discuss and exchange knowledge on market innovations and solutions to better serve the women’s market
- **Relevant ministries** to provide networking and support services for women entrepreneurs.

CASE 7: SHE INVESTMENTS: CUSTOMIZED FINANCIAL SERVICES FOR WOMEN-OWNED SMALL AND MEDIUM ENTERPRISES

SHE Investments in Cambodia works towards bridging the gender gap in access to finance for women entrepreneurs. Although about 61 percent businesses in Cambodia are owned by women, most of them operate in the informal sector. Through several field-based research projects, SHE Investments identified the challenges women entrepreneurs face in accessing finance. They identified that women entrepreneurs need access to credit at affordable rates as well as structural support to run their businesses and utilize credit. SHE investments works on multiple fronts:

1. Providing access to low-cost credit for micro-entrepreneurs through partnerships with FSPs,
2. Incubating and accelerating programs to support women entrepreneurs to scale their businesses,
3. Augmenting the knowledge gap for women entrepreneurs through digital literacy programs on a host of issues ranging from business registration, licensing, business finance management, bookkeeping, etc. The curriculum is tailored to the needs that women entrepreneurs bring up in their various interactions with SHE Investments.

The impact of these activities is measured through increase in enterprise revenues, employment generated through these enterprises, and access to capital for women entrepreneurs incubated by SHE investments.

PARTNER

Policy design and implementation involve multiple stakeholders. Partner institutions are crucial in making the policy work effectively. Collaborating with them must be a key theme across stages of policy development. When policy development gets buy-in from implementing partners along the route, it can minimize friction later and ensure that the essence of the policy is understood by all those tasked with its implementation. Women users and providers at the helm of partnerships will ensure that policies are truly gender-transformative and reflect the considerations of the last mile. Some steps that regulators can take to ensure effective collaboration include the following.

**Step 1: Conduct** a stakeholder mapping exercise to include all relevant public and private sector stakeholders who would play a role in developing and implementing a policy. Stakeholder mapping can be done in two stages:

- **Internal mapping**: the team in charge of developing the policy can create a list of stakeholders based on their knowledge and experience,
- **Consultative vetting**: external stakeholders can be consulted to understand their capacity and capability with regards to their involvement in the policy development.

**Step 2: Collaborate** with other policymakers, as some aspects of financial inclusion policy implementation may fall outside the regulator’s purview and may, instead, be the responsibility of other regulators, ministries, or departments. In such a case, regulators must engage with policymakers/other regulators with mandates to focus on women’s economic empowerment and social development. Depending on the nature of activities and expected outcomes, regulators may form task forces or steering committees with representatives from different departments to enable effective inter-agency collaboration.

**Step 3: Consult** FSPs, before and while developing policy interventions. This would not only help minimize the risk of unintended consequences of a new policy initiative but also provide insights into the possible impact of the proposed policy intervention.

**Step 4: Document** insights from stakeholder consultations and use them to refine the policy intervention. If possible, inform the stakeholders who provided feedback on how their concerns were
addressed. Typically, working policy documents are put into the public domain for a specific time to gather views from the general public. This generates buy-in for the policy initiative and flags important policy areas that might have been missed.

**Step 5: Refine** the policies based on the feedback from the stakeholders.

**Step 6: Implement** the policies in collaboration with and support various stakeholders.

**Step 7: M&E** the progress of the policy in collaboration with the relevant stakeholders.

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**CASE 8: PROMOTING FINANCIAL INCLUSION FOR WOMEN AND WOMEN ENTREPRENEURS - COLLABORATION BETWEEN POLICYMAKER, REGULATOR, AND PRIVATE SECTOR PROVIDER**

In 2020, the National Bank of Cambodia, the Ministry of Women’s Affairs, and Visa launched a year-long program in Cambodia that aimed to improve the financial literacy of Cambodian women with a particular focus on empowerment via digital platforms. The project “Promoting Financial Inclusion for Women and Women Entrepreneurs,” offers vocational education, networking, and financial literacy programmes. In addition to a number of high school girls and undergraduate students, the program also caters to young women and women entrepreneurs, especially in rural areas, who aspire to set up a business or already run a micro-business. The project also develops the technical capacity of staff at Ministry of Women’s Affairs, to help them better address the needs of women in Cambodia.

*Sources: UNDP Cambodia - FINANCIAL INCLUSION FOR CAMBODIAN WOMEN ENTREPRENEURS https://undpcambodia.exposure.co/financial-inclusion-for-cambodian-women-entrepreneurs*

**PREDICT**

It is imperative that policymakers have a strong culture of data-driven, evidence-based policymaking to facilitate women’s financial inclusion. SDD helps regulators understand the state of women’s financial inclusion at any given point. Consequently, it facilitates the design of policies needed to improve women’s financial inclusion and evaluate progress over time. By publishing/sharing key data points, FSPs and other relevant stakeholders can also use SDD to understand better opportunities offered by the market and devise strategies to convert women into active users of their products. Collecting and using SDD requires a concerted effort from a range of stakeholders. Regulators are best placed to mandate and handhold stakeholders to collect and analyze SDD to generate meaningful trends to predict the financial behaviors and needs of women users.

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**See: AFI’s Guideline Note No. 26 (January 2017) for more guidance on collecting, analyzing and leveraging SDD to accelerate women’s financial inclusion.**

The collection of SDD should be bi-directional. Both demand-side and supply-side data should be collected since they provide complementary insights into the landscape of women’s financial inclusion.

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**CASE 9: SEX-DISAGGREGATED DATA COLLECTION IN RWANDA**

Rwanda’s efforts in women’s financial inclusion data began with the collection of demand-side data. This showed steady improvements in financial inclusion. In just four years (2012-2016), formal financial access, including both bank and non-bank financial institutions, had substantially increased for women, from 36 percent to 63 percent. However, 2016 demand-side data also showed low usage of commercial bank accounts by women (24 percent) and a 13 percentage points gender gap in mobile money account ownership.

The National Bank of Rwanda has also made significant progress in the collection and standardization of sex-disaggregated supply-side administrative data from banks and other FSPs. Supply-side data on a host of sex-disaggregated indicators has since shown that women repaid loans more consistently than men, even though they accounted for a lower number and value of bank loans overall. Also, although 58 percent of women co-own land with their spouses, women-headed households have greater access to land ownership, and 24 percent of women-headed households have individual ownership of land as compared to 14 percent sole ownership by male households.

With additional improvements on sex-disaggregated supply-side data, this data can be used to demonstrate the business case for serving women clients and creating tailored financial products and services that meet their needs.

*Sources: Data2x, Case stud. Data Driving Women’s Financial Inclusion: Rwanda’s Experience; Excerpt. Progress, Challenges, and the Future for Women’s Financial Inclusion Data at the 2019 AFI Global Policy Forum.*
PROTECT

While digitization has made access and usage of financial services more convenient to clients, it has also made them vulnerable to cyber fraud. Typically, women have less opportunity to be as literate as men, and many are late bloomers to adopt the technology. Limited knowledge and comfort with technology make women more susceptible to fraudulent situations. While it is imperative that women are not left behind in the digital age, it is equally important to protect them, maintain their privacy, and build trust and confidence while they transact with financial institutions. This can be done only when customer protection policies are gender-sensitive and carefully tailored to the specific issues faced by women.

**Step 1: Identify** vulnerable points in the customer journey where women are susceptible to fraudulent activities.

**Step 2: Ensure** that cybersecurity policy, data privacy policy and customer protection frameworks include gender-specific risk mitigation strategies. While customer protection principles, such as SMART principles, comprehensively cover all genders, it is important that regulators and FSPs maintain a gender-sensitive outlook while adopting customer protection practices and mechanisms.

**Step 3: Establish** gender-sensitive consumer protection and market conduct guidelines and mechanisms for FSPs. Some measures that FSPs could take include:

> FSPs must have a fair representation of women at the customer service desk to receive queries, complaints, and grievances from women customers

> FSPs must commit to a defined turn-around time and follow up with customers once a complaint is filed

> Data privacy protocols must be in place to ensure the personal information of women users is secured and not shared with third-party institutions, which might not be subjected to similar compliances

> Information about grievance mechanisms and escalation matrix must be readily available at financial access points and other venues accessible for women.

**Step 5: Educate women.** Regulators must also ensure that the financial education curriculum includes information about types of fraud, ways of fraud prevention, dos and don’ts while transacting with digital mediums, and grievance redress mechanisms.

OPERATIONAL COMPONENT - HOW TO DEVELOP A GENDER-INCLUSIVE POLICY

**PHASE 1 - PRE-FORMULATION**

**Identify the contours of the policy agenda**

Policymakers should start by clearly identifying the core objectives related to financial inclusion among women. Identifying core objectives and sub-segmenting the women’s market is a prerequisite for developing targeted policies and products. Figure 17 lists key considerations for regulators developing the women’s financial inclusion framework.

**FIGURE 17: KEY CONSIDERATIONS FOR REGULATORS DEVELOPING FINANCIAL INCLUSION FRAMEWORK**

<table>
<thead>
<tr>
<th>Step</th>
<th>Consideration</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Design outcome-based financial inclusion framework&lt;br&gt;Consider appropriate sociocultural aspects, level of awareness, access, usage and behavioral patterns for financial services prevalent in the national context.</td>
</tr>
<tr>
<td>2</td>
<td>Adopt global practices to develop frameworks&lt;br&gt;Look for global practices that can serve as case studies to develop frameworks suitable for the local context.</td>
</tr>
<tr>
<td>3</td>
<td>Categorise the women’s market&lt;br&gt;Sub-segment women’s market into categories such as youth, mothers, professionals, women entrepreneurs, and old age women to develop targeted policies and products as relevant.</td>
</tr>
<tr>
<td>4</td>
<td>Update the framework based on feedback&lt;br&gt;Ensure that the framework is seen as a living document and is regularly updated based on feedback from the relevant stakeholders.</td>
</tr>
</tbody>
</table>

**Gather information from internal and external sources**

Gathering information is crucial to adopt an evidence-based approach to financial inclusion for women. Information should be gathered from internal (including the central bank’s internal repositories of research and data) and external sources (information reported by regulated institutions, relevant data collected by different line ministries, and reports generated by credible external agencies).

A complete picture will only emerge once data is available from both demand-side and supply-side stakeholders:

> **Demand-side data** helps policymakers/FSPs to prioritize their focus areas and target groups - in this case - several sub-segments of women.
Supply-side data includes products and services from service providers, such as risk registers and complaints. This data is readily available as regulators collect and organize the data frequently.

Figure 18 suggests measures that can be undertaken for the collection and use of demand- and supply-side data:

Review existing national plans, legal frameworks, and policies
It is important to comprehensively review the legal and policy ecosystem beyond the financial sector to identify specific policies and laws that might require modification to incorporate women-centric policies and provisions. This action is important because it will help inform the scope of policy revision/development and avoid duplication of effort. Figure 19 details how this can be accomplished.

1 Develop a list of policies, legal frameworks, and legislation about women’s financial lives.
2 Identify and map relevant stakeholders associated with these policies and legislature.
3 Identify specific policy gaps, and review the regulators’ plans to modify such policies and associated timelines.

Coordinate support from key stakeholders
Based on the findings of the previous step, establish an engagement plan for various policymakers, regulators, and stakeholders who need to be involved directly or indirectly in policy development, as shown in Figure 20.
Identify team members to work on policy development
It is important to identify competent team members who are sensitized and engaged in women’s financial inclusion issues to work on developing the policy. Usually, this is done by creating a task force. Figure 21 guides policymakers in identifying team members.

PHASE 2 - FORMULATION
Develop policy document
The first step into the Formulation stage should include developing a policy document that includes, among other things, the key components identified in Figure 22.

FIGURE 21: IDENTIFY TEAM MEMBERS FOR TASK FORCE TO DEVELOP GENDER-INCLUSIVE POLICIES

REVIEW AND IDENTIFY
Specialists involved in activities relating to women’s inclusion and empowerment.

INDUCT
Experienced and competent team members.

ENSURE
Male and female officials/staff from diverse socioeconomic backgrounds are a part of the team.

FIGURE 22: KEY COMPONENTS OF A POLICY DOCUMENT

DEVELOPING A GENDER-INCLUSIVE POLICY DOCUMENT

- Objective and scope of the policy
- Policy guidelines
- Gender-sensitive roadmap to implement the policy
- Roles and responsibilities of relevant stakeholders
- M&E Framework
- Rationale for the policy
Conduct a peer review of the policy from a gender lens

Before finalizing a policy, it is important to hold public consultations to seek comments and recommendations from the ecosystem players. One of the ways is to share the draft policy document with the industry and independent experts for peer review using a gender lens and invite comments within a given timeframe. Figure 22 shows points that should be considered during this task.

FIGURE 23: CONDUCT PEER REVIEW OF GENDERED POLICIES

1. Circulate the document or hold consultations with stakeholders on the policy document from a gendered perspective.
2. Ensure mixed method techniques are used for well-rounded consultation and feedback, including:
   - key informant Interviews
   - focus discussion groups
   - workshops with stakeholders.
3. Involve donors and international development organizations in the policy review process to provide a global perspective.

Develop a balanced and diverse governance structure

A strong governance structure is one of the key prerequisites for successful policies. A robust governance structure will ensure that the core philosophy and rationale of the policy are never lost sight. Figure 24 contains the key elements of a balanced and diverse policy governance structure.

FIGURE 24: FORMALIZE PARTNERSHIPS TO FACILITATE POLICY IMPLEMENTATION

1. There is a balanced and diverse representation of key stakeholders in policy-making and implementation.
2. Suggestions of relevant stakeholders are adequately considered at all stages of policy development and implementation.
3. Roles and responsibilities of stakeholders are assigned with due consideration to their expertise and skill set needed in specific policy areas.
4. Progress is monitored, and proper coordination for policy implementation is maintained between all stakeholders.

Formalize public-private partnerships/collaboration

At this stage of formulation following the development of the policy document, it is important to formalize public-public and public-private partnerships to facilitate collaboration in the implementation stage. Figure 25 can help in establishing these partnerships.

FIGURE 25: FORMALIZE PARTNERSHIPS TO FACILITATE POLICY IMPLEMENTATION

1. Encourage stakeholders to identify potential partners.
2. Use established governance structures to forge strategic partnerships between stakeholders.
3. Repeat this process throughout the policy lifecycle.

PHASE 3 - IMPLEMENTATION

Communicate the policy agenda with stakeholders

Once the policy is finalized and approved, policymakers must ensure that it and its related provisions are appropriately and adequately disseminated among all stakeholders. Figure 26 shows the points that may be considered.

FIGURE 26: COMMUNICATE POLICY AGENDA TO THE STAKEHOLDERS

1. Develop A guide for communication campaigns and advocacy mechanisms.
2. Circulate The detailed policy note and associated guidelines to all stakeholders.
3. Organize Regular workshops to discuss the implementation of the policy and answer queries.

See: AFI’s Communicating Women’s Financial Inclusion Toolkit > View here
**Oversee policy implementation**

It is important to put in place standardized measures to assess the progress of policies, processes, and practices and ensure accountability for results. By putting in place the mechanisms detailed in Figure 27, policymakers will be able to create a support system that will enable them to assess the progress and receive valuable feedback.

> View here

**FIGURE 27: OVERSEE POLICY IMPLEMENTATION**

1. **Develop guidelines** to be followed by relevant stakeholders in implementation of the policy.

2. **Develop mechanisms** to assess gender sensitivity in FSP systems, such as onboarding women leaders who can give a gendered perspective to the policies, incentivizing agents and merchants to collect feedback from women clients, etc.

3. **Disseminate** information about these standards and mechanisms to stakeholders through the organization’s newsletters, publications, and websites.

4. **Review** guidelines, processes, and mechanisms periodically to align with the evolving landscape and frequently communicate the changes to the relevant stakeholders.

**Develop a Monitoring and Evaluation (M&E) framework**

Policymakers and FSPs need to ensure that any policy/program/product can achieve the desired purpose and meet its objective. Therefore, it is important to develop a gender-focused M&E framework and indicators to guide the design, implementation, and monitoring of the policy. The regulator should also provide clear guidance on the M&E framework to all stakeholders.

**Institute a system for SDD collection, analysis, and reporting**

Since policies are designed for women, adopting a gendered approach to data collection is essential. Policymakers should institute a system for the collection, reporting, and analysis of SDD by all regulated entities. This will help collect evidence on the progress and impact of women’s financial inclusion policies. Wherever needed, policymakers must provide guidance to FSPs in developing their in-house capacities for the collection, analysis, and reporting of SDD. Ensure that disaggregated data is publicly available so stakeholders can take appropriate measures.

**Conduct periodic progress assessments and undertake independent reviews**

Regulators need to monitor and review the progress of policy implementation periodically. Since policies are likely to have an impact over the medium to long-term, it is important to undertake an independent review/impact assessment to obtain a holistic and unbiased view of the changes observed on the ground. The assessment should be undertaken by an independent reviewer with knowledge/experience on women’s financial inclusion with support from the institution’s financial inclusion unit, gender focal point(s) and M&E team.

Findings from such review exercises must be regularly disseminated so that the industry and different stakeholders are informed about the progress/improvements, including the ongoing challenges and opportunities. Figure 28 lists elements that should be considered for a mid-term and long-term review.

The results of the women’s financial inclusion strategy implementation should be communicated to all stakeholders (government, public sector agencies and private sector players) so that the efforts of all the contributors are adequately recognized and acknowledged. This communication can also be used to build partnerships for interventions in the future.
FIGURE 28: REVIEW POLICY IMPLEMENTATION

CONDUCTING A MID-TERM POLICY REVIEW

- Publish mid-term review reports and disseminate them to all stakeholders.
- Publish periodic progress reports on the strategy and the outcomes of gender-focused policy areas.
- Revise the scope, targets or implementation plan of the women’s financial inclusion policy based on the findings.

CONDUCTING A LONG-TERM POLICY REVIEW

- Undertake impact assessment after 3 to 5 years of policy launch.
- Use comparable baseline and mid-line indicators to track progress over time and compare it with end-line results.
- Communicate the results of the women’s financial inclusion strategy implementation with all possible stakeholders via workshops, conferences and publications.
4. PART 2: TOOLKIT FOR FINANCIAL SERVICE PROVIDERS

This part of the toolkit is for FSPs/non-FSPs. It aims to guide them in developing appropriate products, services, and processes for women. The toolkit is guided by some key tenets presented in Figure 29.

Any FSP offering gender-transformative products and services must have in place three key aspects:

1. **Identification** of the women’s market as a distinct user segment with specific needs and behaviors
2. **Creation** of products that place women at the center of the design process and address the specific needs of women
3. **Establishment** of gender-intentional processes and channels.

Institutions must expand their scope internally and externally to cater to the women’s market. For this, the toolkit details how institutions can:

1. **Embed** non-financial services, such as financial literacy training and business development support for women, in their product offerings
2. **Invest** in institutional development to prepare institutions for internal change in outlook when they expand their scope to cater to women through gender-transformative services
3. **Assess** the impact of their products and services with a gender lens by using appropriate tools.

**IDENTIFY THE WOMEN’S MARKET AND THEIR SPECIFIC NEEDS**

In a gender-neutral environment, FSPs often do not recognize women as distinct customer segments. Without understanding the financial behaviors of women, FSPs are missing out on an opportunity to tap into this large consumer base, especially in this age of digital transformation, where the cost of acquiring new (remote) customers (in low-income groups) is rapidly decreasing.

Figure 30 lists some activities FSPs can undertake to identify the women’s market and their specific needs.

**Step 1: Understand** the needs and financial behaviors of women customers. Strategic importance must be placed on serving the women’s market, starting with ensuring the support of the senior management and the board. Management by in would provide the necessary weight needed to drive initiatives forward across the institution.

**Step 2: Estimate** the market size of active and potential female customers for financial services. This would help FSPs understand the addressable market and strategies for onboarding them.

**Step 3: Collect and disaggregate data, at source, based on sex.** FSPs can use data to understand new market opportunities, fine-tune existing products and processes with a gender lens and ensure better customer journeys for women.

**Step 4: Analyze** data to understand and consequently predict data patterns. In this age of digital transformation and big data, FSPs stand to lose out on important intelligence if they do not capture and analyze customer data helpful in carrying out predictive models to determine customers’ expected probability of default. FSPs should collect, organize, and store SDD for meaningful gender-sensitive analysis.

**BOX 2:** INDICATIVE LIST OF SDD INDICATORS THAT CAN BE COLLECTED BY FSPs

| > Account ownership |
| > Participation by gender in financial literacy and education initiatives |
| > Credit disbursed |
| > Usage of internet and mobile banking platforms |
| > Repayment discipline |
| > Complaints and queries |
| > Spread of SME products |
| > Investment spreads |
| > Savings products (other than basic savings account) |
| > Dormant vs. active accounts |
| > Usage of payment interfaces |
| > Insurance and microinsurance access |
FIGURE 29: GENDER-INCLUSIVE PRODUCT DEVELOPMENT FRAMEWORK FOR FSPS

- Identify the women’s market
- Institute gender-intelligent processes and channels
- Embed non-financial services to offerings
- Assess organizational impact with a gender lens
- Invest in institutional development
- Create value-driven products

FIGURE 30: GUIDE FOR FSPS TO IDENTIFY THE WOMEN’S MARKET AND THEIR SPECIFIC NEEDS

UNDERSTAND
the needs and financial behavior of women customers.
Include women as a target segment in strategy plans mapped with measurable goals.
Understand the women’s market through standalone research and analysis of information available in the public domain.

ESTIMATE
the market size of active and potential women customers.
Develop a business case to cater to women and track costs after product launch to understand product break even.
Segment the women’s market into addressable sub-segments based on occupation, age group, income, lifecycle stages, and geographies to identify the right fit.

COLLECT
SDD on product(s) access and usage.
Users’ demographic data from application forms, KYC documents etc. subject to data privacy laws.
Data from MIS reports tagged to each customer (dormant v. active accounts, transaction frequency, etc.).
Insights from various quantitative and qualitative research periodically conducted.

ANALYSE
data to understand and consequently predict data patterns.

GATHER INSIGHTS ON ACCESS
Which are the most preferred channels to access financial services?
What is the most accessed product for women customers in your user base?

GATHER INSIGHTS ON USAGE
Which products are used more by women customers?
Which services are used more by women entrepreneurs?

GATHER INSIGHTS ON QUALITY
What does a customer journey look like for your women clients?
What is the nature of queries made by women customers?
What is the nature of complaints raised by women customers?
**CASE 10: FINTECH IN KENYA ENABLING ACCESS TO CREDIT FOR WOMEN MSMEs**

Pezesha, a Kenya-based firm, helps small and medium-sized businesses to obtain working capital through a collaborative approach with banks, microfinance institutions and other financial institutions or networks. Pezeshas’s customer base constitutes primarily of women entrepreneurs. SDD collection and analysis is central to their business model. This helps them identify trends on the repayment rates and also segment customers. They also collect qualitative information through feedback from customers. Data they collect helps them partner with the right institutions and offer appropriate financial products for their customers. Pezeshas has also developed personalized financial education content to women entrepreneurs to develop positive credit history which allows them to avail credit easily in the future.

*Sources: Key informant interview conducted with Pezeshas staff member as part of the toolkit development process.*

**VALUE-DRIVEN PRODUCT DEVELOPMENT FOR WOMEN**

In any environment, products and services that offer a specific value and fill a gap or a latent need have a much better user uptake. In this sense, creating products for women means that they must be at the center of the product development process. Human Centered Design (HCD) enables FSPs to put the end-user at the center and develop a need-based product. Figure 31 outlines how a typical HCD-based product cycle can incorporate a gender lens.

**CASE 11: INNOVATION THROUGH CREDIT BUREAU IN MEXICO AND PERU**

Circulo de Credito, a credit bureau operating in Mexico and Peru, has created a credit scoring mechanism to support financial institutions underwrite loans for underserved target segments. The financial maturity score uses data on family/household level credit behaviors to assess credit worthiness of women clients who may not have traditional credit histories. Circulo de Credito has also created digital and biometric-based signature to enable women to apply for loans securely from their mobile phones.


**BOX 3: KEY POINTS FOR DISTILLING IDEAS IN AN HCD BASED APPROACH**

It is important ideas are brought in without the filters of viability and profitability at the beginning of this stage. This will foster innovation among the team members, as they are not restricted to come up with only those ideas that will work from a business lens. Once all the ideas are gathered, the teams can then filter them based on:

- priority of solving a particular challenge area
- ease of implementing the product/service
- business sense in terms of viability in the short-term and profitability in the medium- to long-term.

**BOX 4: KEY QUESTIONS TO ASK FOR TRANSACTION/SAVINGS ACCOUNT PRODUCT DEVELOPMENT**

- How far is the average branch from customers?
- Will women be able to travel to the branch with ease?*
- What are the money and time costs women incur travelling to the branch and conducting transactions?
- How might we solve the challenge of women’s mobility and access?
- Is the cost of offering the optimal solution?
- How might we bring cost efficiencies while ensuring the right product fit?

*Note: Consider geographical distance to be travelled, as well as religious and sociocultural norms which may impact women’s mobility.

**BOX 5: KEY QUESTIONS TO ASK FOR CREDIT PRODUCT DEVELOPMENT**

- What kind of financial support do women entrepreneurs need at different stages of their business?
- Do they have access to collateral?*
- How are businesses run by women different than those operated by males and consequently how should we assess them?
- Do they have credit histories? If not, how do we facilitate their entry into the formal financial system?

*Note: Access to collateral may not solely be dependent on affordability of the borrower. Women may more often be constrained by land ownership and inheritance laws and may not have access to traditional collaterals.

**BOX 6: RAPID PROTOTYPING**

Like its name suggests, rapid prototyping is done as a quick exercise to ensure that the product fits with the target segment. This also helps get a buy-in from customers at an early stage. However, prototyping should not be looked at as a quantitative metric for the success of the product. Product’s success can only be accurately measured through the pilot and launch phases.
FIGURE 31: GENDER-INCLUSIVE PRODUCT DEVELOPMENT

IDEA DISTILLATION
At this stage, FSPs can assimilate all the research they have gathered and develop ideas that address one or more challenges women face in their financial lives.

Women need different financial products for different reasons and at different stages of their lives than men.

Providing financial products for events in women’s lives, FSPs can build lasting relationships with them.

DEVELOP PRODUCT CONCEPT
Keep close track of how each product feature and the process will look for a woman client.

See Boxes 4 and 5 for indicative questions FSPs can ask when designing different aspects of product journeys for women clients.

RAPID PROTOTYPING AND ITERATION
Prototyping is an important step in an HCD-based product development process.

The idea is to ensure that the final product is demand-led.

The product concepts can be shown to a sample group of potential female customers.

The product team may use the feedback from prototyping to iterate the product design and ensure it fits with the customer segment.

PRODUCT PILOT AND LAUNCH
At this stage, the product, processes, and human resources are aligned to take the product to market.

Ensure that the product communication is relatable and accessible for women users.

Set, measure, and monitor gender-specific performance metrics throughout the product lifecycle.

Take constant feedback during the pilot stage to understand what process or feature needs to be fine-tuned or changed.

CONCEPT IDENTIFICATION
Focus on understanding women’s lifecycle and stages where financial services can support their growth and needs.

Map the lifecycle stages of women from childhood education via becoming earning and supporting members of the family to old age.

Identify the right points of entry for financial services through these lifecycle moments.

Focus on understanding women’s lifecycle and stages where financial services can support their growth and needs.

Map the lifecycle stages of women from childhood education via becoming earning and supporting members of the family to old age.

Identify the right points of entry for financial services through these lifecycle moments.
GENDER-INTELLIGENT PROCESSES AND CHANNELS

A. GENDER-INCLUSIVE PROCESSES

In one of their reports, the Center for Financial Inclusion observed that “customers interact with FSPs through a variety of processes, beginning with discovery, continuing with onboarding, and progressing to continuous usage.” How a product is accessed shapes the experience with it in some ways. Women encounter numerous challenges, from learning about the product until they begin using it. Their journey is central to their experience and shapes their perception of the product and the financial institution. This experience becomes the primary source of knowledge for many as it is shared with family, peers, and the wider community.

**Step 1: Assess** existing processes with a gender lens. Right from the stage of discovery, take a critical look at the processes that women must follow and whether they face challenges in doing so. Figure 32 lists some questions FSPs could ask.

**FIGURE 32: ASSESSING PRODUCT JOURNEYS WITH GENDER LENS**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td><strong>Awareness</strong> Is the product information available directly to women? If information is disseminated through camps and community activities, is the format of such activities conducive to women?</td>
</tr>
<tr>
<td>2</td>
<td><strong>Documentation</strong> Do women have self-sufficient access to the documentation they may need to open a full-fledged account?</td>
</tr>
<tr>
<td>3</td>
<td><strong>Streamlining</strong> Are there steps that can be reduced to open an account?</td>
</tr>
<tr>
<td>4</td>
<td><strong>Redressal</strong> Are the query resolution systems designed so women can easily raise queries?</td>
</tr>
<tr>
<td>5</td>
<td><strong>Safety</strong> Can women safely report harassment and fraud complaints? What are the mechanisms that can help them come forward and report such incidents?</td>
</tr>
</tbody>
</table>

**Step 2: Identify** touchpoints where sensitizing existing staff can make a process more seamless and less cumbersome for women.

**Step 3: Simplify processes.** FSPs lean on being overcautious rather than exposing themselves to risk. For example, they sometimes ask for a higher burden of proof from women than men, even though women present a low-risk profile. Although risk awareness is a sound business practice, it adds to their burden when women are required to produce extra documentation or repeat the same processes for a different product.

This burden may drive women away from using formal banking services altogether. It also adds to the cost and time taken by FSPs to process a loan, open an account, or allow members to access their own savings. Based on investigations done in the above steps, FSPs are encouraged to identify the various pain points encountered during the product journey and work to simplify them. Removing redundancies and easing processes while remaining within regulatory guidelines must be the aim of simplification.

**Step 4: Institute** gender-sensitive grievance redress systems. Women more often do not know where to report a grievance and how to escalate it. This may turn them away from transacting with the institution altogether. Grievance systems must be gender-sensitive to ensure that women can transact with the FSPs in a safe and secure environment. Figure 33 presents some ways to achieve that.

B. GENDER-INCLUSIVE DELIVERY CHANNELS

A conducive delivery channel is critical in enhancing access and usage of financial services. The development of delivery channels can resolve two key obstacles for women: proximity and affordability of financial services. For FSPs, channel development is a way to gain economies of scale, expand the customer base and serve geographies that may otherwise be remote and underserved.

However, women face numerous hurdles in accessing services from bank branches via agent networks to mobile banking. Mobility and illiteracy/illiteracy present the foremost hurdles. Women often need a personalized approach to understanding a product. They learn through heuristics and by experiencing services first. Controlled experiential learning can be crucial to enabling women’s adoption of services because it helps them to build trust. Applying a gender-sensitive or gender-transformative lens to channel development can help transform how women access and use financial services.

There are several ways FSPs can ensure their channels are gender-inclusive, some of which are presented below.

**Step 1: Design** the financial services delivery channel for women, such as the one shown in Figure 34.

---

FIGURE 33: GENDER-SENSITIVE GRIEVANCE REDRESS SYSTEMS

**ENGAGEMENT**
FSPs can set toll-free numbers serviced by women customer service executives. This number can be a ready mechanism for women to report any grievance.

Institutionalize gender sensitivity training at all levels of the organization.

**TIMEBOUND**
Define grievance resolution timelines and communicate them clearly to customers when they file a complaint. This builds trust in the system.

**FEEDBACK**
Set up grievance redress cells within the institution, which can keep track of all grievances coming in, make spot checks at different access points, take feedback from customers and tighten the redress process.

**ACCOUNTABILITY**
Make customer facing employees accountable to uphold grievance mechanisms.

**DOCUMENTATION**
Print customer care and grievance escalation numbers on the back of passbooks or other physical evidence where women can find it easily.

FIGURE 34: DESIGNING GENDER-SENSITIVE FINANCIAL SERVICES CHANNELS

**ESTABLISH ACCESS POINTS**
...with low-cost (digital) infrastructure that use biometric technology to identify the customers and authenticate the transactions undertaken and allow offline transactions so that access points are brought closer to the customers.

**TRAIN AGENTS DEPLOYED AT ACCESS POINTS TO CATER TO WOMEN USERS. FSPs MUST SENSITIZE AGENTS ON THE FOLLOWING:**

- How to speak with female customers.
- Hand-holding women to use technology with the support of other women.
- Maintaining confidentiality of transactions with other members of the household.
- Women value privacy while transacting, which must be abided by at all times.
- In some cases, agents are also tasked with conducting financial literacy sessions in their catchment areas.
- In such cases, agents must be appropriately trained to train others.

- Institutionize gender sensitivity training at all levels of the organization.
Step 2: Employ more women in frontline roles or establish dedicated women’s desks in financial institutions. Women report that they are more comfortable interacting with women agents or tellers. There are several reasons for this, including greater comfort in dealing with agents of the same gender, an implicit understanding that women agents understand their challenges and will potentially be more empathetic and polite, and confidence that their privacy will be respected and kept confidential from other customers and members of their households.

Step 3: Innovate service offerings to encourage more women to visit the access points, as shown in Figure 35.

**FIGURE 35: INNOVATIVE GENDER-INCLUSIVE FINANCIAL SERVICES ACCESS POINTS**

1. Set up access points in places where women congregate, including health centers, schools, and points of sale for rapidly moving goods, where they can access contraceptives, schooling information, and conduct financial transactions (including digital payments).
2. Having kiosks in public places more frequented by women customers.
3. Setting up dedicated branch/access points for women, operated by women, with a special suite of services and product experience.
4. Promote person-to-person mobile money transactions so that women gain value by transacting through these channels.

Step 4: Simplify the user interface for mobile applications on feature phones and smartphones, keeping in mind the capacities of users. Use inclusive language and include icons that are relatable to women users, such as:
- depositing money in a money box or an earthen pot
- marking repayments on home calendars
- showing interest calculations in a simplified format.

FSPs are likely to cater to oral customers who may be innumerate and illiterate. Any digital application design must aim to replicate the heuristics and associations that women have with money as closely as possible.

**EMBED NON-FINANCIAL SERVICES IN PRODUCT OFFERINGS**

Women are less likely to have the opportunity to gain the general and financial literacy needed to access formal financial services. Hence marketing products to them is a long and often challenging route. FSPs are uniquely positioned to support these endeavors and help women become adept at using financial products and services. Providing non-financial services with tailored products at different stages of their lifecycle can enable FSPs to understand their growth journey better and be a part of their growth process. Areas where FSPs can support women users through non-financial offerings are discussed next.

A. FINANCIAL LITERACY AND EDUCATION FOR WOMEN

Financial literacy programs are generally gender-neutral and do not consider the unique needs of the different segments of the women’s market. There are limited cases of innovation in financial literacy programs for women. Digital financial literacy programs for women are even more limited in that they do not regularly recognize the fact women have a starting point that is further away and have less opportunity or experience in using digital technology. This gives FSPs an excellent opportunity to make significant progress in this area.

It is important for financial institutions to focus on the needs of users and generate consistent usage of their products. This can be done with frequent engagement throughout important lifecycle events for women. Financial literacy and financial education programs allow FSPs to engage with potential and existing users. Further, developing a base of customers capable of making well-informed decisions ensures a loyal customer base for the FSP in the long run.

Figure 36 outlines ways FSPs can make financial literacy programs gender-inclusive.

Step 1: Understand the barriers hamper women’s access to financial education.

Step 2: Create financial literacy programs that are accessible, relatable, and actionable.

Step 3: Coordinate with relevant stakeholders to address gender issues and financial literacy for women and girls. These partnerships are crucial for FSPs to maintain an edge in catering to women and offering gender-transformative services.

Step 4: Measure the impact of financial literacy programs. Gathering data from financial education activities can also support FSPs in tracking whether these sessions motivate women to open new accounts, start formal savings, or obtain their first formal credit. This information can demonstrate a proof of concept for FSPs that financial education helps bring women into the formal banking system.
FINANCIAL PRODUCTS AND SERVICES FOR WOMEN'S FINANCIAL INCLUSION: A POLICY AND REGULATION DESIGN TOOLKIT

B. BUSINESS DEVELOPMENT SERVICES FOR WOMEN ENTREPRENEURS

Women entrepreneurs usually do not have access to business networks like their male counterparts. However, the presence of such networks can help women entrepreneurs validate their ideas, navigate through challenging situations, and prioritize enterprise growth. Some ways FSPs can provide women entrepreneurs with business development support are discussed next.

Step 1: Partner with institutions that offer business development and/or training programs focused on women entrepreneurs. FSPs can also develop this offering in-house, with support from multilateral donor institutions and national government entities. Collaborations can also be done with not-for-profit organizations focusing on women’s economic empowerment issues. For example, commercial banks can collaborate with microfinance institutions or cooperatives as a distribution channel because these institutions may better understand the target market.

CASE 12: VODACOM’S M-KOBA SUPPORTS DIGITIZATION OF VILLAGE SAVINGS AND LOANS (VLSA) GROUPS

Vodacom launched M-koba, a digital groups savings platform, in 2019 to digitize savings groups in Tanzania. Through the product, a group leader can create an M-pesa, mobile phone based, account and add members to the account with their mobile numbers. Members can view their account balances, and request for loans through their mobile phones. Each group member is aware of transactions happening in the group, increasing transparency and trust in the process. In just one year since its launch, over 40,000 groups (predominantly women members) signed up for M-koba, making the case to expand use of M-koba for non-M-pesa account holders, as well.

Sources: Key informant interview conducted with Vodacom staff conducted as part of the toolkit development process. Additional information sourced from: GSMA. 2020. Case study. M-Koba: Vodacom Tanzania’s Innovation to Digitise Savings Groups.

FIGURE 36: FSP-LED FINANCIAL LITERACY AND EDUCATION FOR WOMEN

UNDERSTAND
...the barriers to financial education, such as sociocultural norms, gender dynamics, literacy, etc. that may hamper women’s access to financial education and limit their capacity to manage finance independently.

CREATE
financial literacy programs that are accessible, relatable, and actionable.

COLLABORATE
with relevant stakeholders including public, private, and civil bodies with the mandate to address gender issues and financial literacy for women and girls.

EXPAND
collaborate to create targeted training programs for schools, vocational centers, associations for entrepreneurs, farmer cooperatives, etc.

MEASURE
the impact of financial literacy programs and identify learning preferences, outcomes, and divergence in expectations between male and female participants.
Step 2: Bundle non-financial services with the use of a financial product. Prioritize those financial services that would provide the most support to women’s economic empowerment. Figure 37 portrays some ways to provide linked services.

Step 3: Host seminars and networking events for women to create a business growth plan, develop financial projections, etc. Offering such programs will also generate word of mouth about services offered by the FSP. In time, such events could also become a revenue stream and a ready platform to attract a larger customer base of like-minded women entrepreneurs. Other ways in which FSPs could provide non-financial services to women-owned small and medium enterprises include:

> develop an entrepreneurship development cell/unit to support women entrepreneurs
> conduct exhibitions that market and sell products produced by women entrepreneurs
> conduct skill development programs and entrepreneurship awareness programs
> help women entrepreneurs to find marketing opportunities and access selling platforms.

**INVEST IN INSTITUTIONAL DEVELOPMENT**

Offering gender-transformative products and services effectively calls for strategic change within the organization. Women interact with the institution rather than the product. Thus, a gender-transformative approach must be instilled within the organizations’ processes, practices, policies, and people. This can be accomplished if institutions are more deliberate about mainstreaming gender considerations into institutional policies, practices and procedures and create opportunities for women to access financial products and services that are affordable, appropriate, convenient, and sustainable. As a result, they will witness a sea change in the women’s market.

**FIGURE 37: BUNDLING NON-FINANCIAL SERVICES FOR WOMEN USERS**

<table>
<thead>
<tr>
<th>SERVICES DIRECTLY RELATED TO THE PRODUCT</th>
<th>ANCILLARY SERVICES PROMOTING INDIVIDUAL WELFARE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Services and examples that help women understand existing products in the market and the benefits of using them. Some services like this could include:</td>
<td>Financial Service providers have a vested interest in individual health and the success of their customers. Non financial services in this regard could include:</td>
</tr>
<tr>
<td>&gt; Financial literacy modules accessible over social media and other networks that women tend to interact with</td>
<td>&gt; Offering services that help women to manage their personal and family health, including health check-ups</td>
</tr>
<tr>
<td>&gt; Skills development and business development services that directly contribute to the success of credit products</td>
<td>&gt; Collaboration with child care services to help women manage their time as well as make an investment in livelihood generation activities</td>
</tr>
<tr>
<td>&gt; Legal education for women to understand tax laws, inheritance laws and other relevant aspects of financial management</td>
<td>&gt; Sponsoring social support groups to promote safe spaces for women and girls for critical issues including reproductive health, HIV/AIDS, gender-based violence and mentoring programs for girls</td>
</tr>
</tbody>
</table>
Step 2: Develop training content to counter gender stereotypes by showcasing global best practices and case studies of success and challenges faced by women. Training content could include the following information:

- benefits for the firm by increasing the proportion of women employees
- behavioral differences between men and women and how gender can influence perception, problem-solving, leadership, and communication styles.

Step 3: Train your employees. Customize the training program based on the goals you want to achieve internally and in the market. Some situations to mind when training employees include:

- Ensure that the training sessions bring out subtle biases among the employees and open them up for discussion and mediation because sometimes employees, even women, may not be aware of how their views are biased.
- Sensitize employees on appropriate ways of addressing and interacting with women colleagues, clients, and partners.
- Facilitate discussions between men and women employees to identify positive and discriminatory workplace practices and policies.

Step 4: Develop a feedback mechanism to measure the effectiveness of the gender sensitization workshops that had been delivered.

CASE 13: PARTNERSHIPS TO BUILD THE WOMEN’S MARKET ARE ACCELERATING GROWTH OF WOMEN ENTREPRENEURS IN PAKISTAN

Women constitute 49 percent of the population in Pakistan. In contrast, only 7 percent of women have a bank account in the country. To change the landscape and boost women’s financial inclusion, Pakistan’s Habib Bank Limited (HBL), Visa, e-commerce platform Daraz, and CIRCLE, a women focused digital literacy and skill development platform, are addressing challenges faced by women entrepreneurs in different ways.

HBL, Visa, and Daraz have worked together to conceptualize awareness and digital literacy programs for women entrepreneurs. HBL partnered with Daraz to offer the latter’s stimulus package to HBL’s MSME client base in the wake of COVID-19. Visa, on the other hand, is working with partner institutions in Pakistan to create a network of women entrepreneurs where they can share their experiences and mentor other aspiring women entrepreneurs.

In line with its diversity agenda and building on the Nisa program, Habib Bank launched its first all women branch in Hyderabad, Pakistan, in 2022.

CIRCLE partnered with the HBL for its She Loves Tech, a women entrepreneur focused start up incubator. She Loves Tech gives women entrepreneurs a platform to pitch their startups, and grow their business in a global community. Due to the COVID-19 pandemic CIRCLE and HBL virtually hosted the tech competition in 13 cities in 2021.


C. CHANGE MANAGEMENT

Women will always form part of the user base of any financial product or service. However, offering gender-transformative products and services would mean specifically looking at women to design products and offering them relevant, inclusive, and fair products and services. This shift marks a change in the internal organizational makeup, as well as the culture. Thus, gender mainstreaming in the organization is an integral component of change management. Some steps institutions can take to integrate gender-sensitive practices are discussed next.

Step 1: Understand the perceptions of employees about women. Uncover gender biases within the organization. This can be done through psychometric tests, surveys, focus group studies, and mystery shopping exercises.

CASE 14: FAMOS TOOL FOR DOING A SELF-CHECK OF ONE’S OWN ORGANIZATION, BANK OF ZAMBIA

In 2017, the Bank of Zambia augmented its capacity-building programs for FSPs to design women’s market programs. This is helping FSPs to understand the value proposition they can offer to W-MSMEs and incentivize them to develop suitable products for the segment. As of 2020, 32 Bank of Zambia employees had been trained as FAMOS facilitators, and 61 FSPs have undergone FAMOS audits.


D. HIRE MORE WOMEN ACROSS THE ORGANIZATION

Any FSP that intends to serve women but has no women in its leadership or a limited number of women in middle management will miss out on the diverse perspectives and experiences needed to scale up its operations. Gender diversity in leadership helps in bringing sustainability and innovation pathways. Figure 38 shows how FSPs can include more women as employees.
IMPACT ASSESSMENT

Impact assessment can help FSPs to improve their services or encourage certain practices that are going well. It also enables institutions to showcase their impact, access funding, attract employees who want to make a difference, and solidify a positive brand image. Figure 39 details how institutions can assess the impact on women’s financial inclusion.

FIGURE 38: ASSESSING THE IMPACT OF FINANCIAL SERVICES

Collect granular data
> Collect unit-level data from the bank’s data hub.
> Data should include unique customer IDs disaggregated by gender, individual account numbers, credit profiles, branch penetration, etc.
> Access to such data fields can enable FSPs to make business decisions that are feasible both for FSPs and customers

Gather qualitative insights
> Interact with women consumers to understand how a particular intervention has impacted their lives.
> Gather qualitative insights through focus group discussions, feedback sessions, and surveys with women consumers to study the effectiveness of the intervention.

Align data to key goals
> Disaggregate data based on the goals fixed by the organization.
> Pick the relevant data that would help FSPs study the effectiveness of the intervention.
> Collect baseline, mid-line and end-line data for product monitoring. Factor in cost and time constraints for panel studies.

Measure
Impact of interventions on national/sector and program/project levels.
> National and sector level: include regional, national, and sector-level indicators to help benchmark performance with peers,
> Program and project level: use these indicators for project design and M&E frameworks.

CASE 15: ACCESS BANK’S BETA ACCOUNT - JOURNEY FROM ACCOUNT OWNERSHIP TO USAGE IN NIGERIA

In 2013, Access Bank partnered with Women’s World Banking to create BETA account - a digital savings product for women entrepreneurs in Nigeria. BETA account was built to alleviate complications of opening and transacting with a regular bank account. The BETA account can be opened in five minutes; members are able to access value-added services including credit and targeted savings products through the account on their mobile phones. The key was to reduce the requirement to visit bank branches and bring banking to members. In line with this, Access bank also expanded access points to transact with BETA account, including doorstep savings service.

By 2018, women held 38 percent of BETA accounts. However, account usage was really spurred by BETA targeted savings account. The proportion of accountholders investing in short term savings products went up from 53 percent in 2016 to 70 percent in 2018.

The BETA account brought about an entire ecosystem of specialized products, channels and non-financial services for Access Bank’s women client base. While not all products gained consistent adoption (such as long-term savings product), the BETA account has been able to generate deep insights into what spurs usage of bank accounts for women.

Sources: Data2x, Women’s World Banking, 2019. Report. Tracking the journey of diamond bank’s beta customers from account ownership to usage.

> View here
### FIGURE 39: HIRING MORE WOMEN ACROSS THE ORGANIZATION

<table>
<thead>
<tr>
<th>INITIATE A DISCUSSION ON WORKING WITH WOMEN</th>
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<tbody>
<tr>
<td>Facilitate discussion among senior leaders about biases in the organization about working with women as colleagues and leaders.</td>
</tr>
<tr>
<td>Most organizations still have a glass ceiling that is not amicable to most women.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EMPHASIZE THE IMPORTANCE OF GENDER DIVERSITY</th>
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<tbody>
<tr>
<td>Demonstrate the importance of having more women leaders onboard from a business growth perspective.</td>
</tr>
<tr>
<td>Use this as a catalyst to take action and hire more women.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>PROPORTION OF WOMEN IN THE TALENT PIPELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Assemble a pool of potential leaders who will ensure diversity in the organization.</td>
</tr>
<tr>
<td>Hiring should primarily be based on merit and not the gender of the applicant.</td>
</tr>
<tr>
<td>However, a conscious thought on hiring women right from the planning stage ensures that female candidates are assessed fairly.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SUPPORT PROFESSIONAL DEVELOPMENT FOR WOMEN</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mentorship for emerging women leaders can help provide an ecosystem to break the glass ceiling.</td>
</tr>
<tr>
<td>Addressing their needs can help them achieve their potential and support business growth.</td>
</tr>
<tr>
<td>Mentorship programs could be offered to employees from the onset of the recruitment.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAVE AN ANTI-HARASSMENT POLICY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Create a functional anti-harassment board that can swiftly take action and prevent situations of harassment against women.</td>
</tr>
<tr>
<td>Women should be represented fairly. This would ensure that women can work peacefully in the organization and unleash their fullest potential.</td>
</tr>
</tbody>
</table>
ANNEX 1
GLOSSARY OF TERMS AND DEFINITIONS

SEX
Sex is the biological characteristic of a person. Generally, it is based on reproductive function and falls under the main categories of male, female, and intersex.

GENDER
This is a spectrum that extends beyond the binary of men and women. It is commonly understood as the roles, behaviors, activities, and attributes a society considers appropriate for men and women at a given time. These socially constructed attributes, opportunities, and relationships, which differ from biological sex, are typically transmitted through socialization.

GENDER AWARE
An understanding that the roles and social relationships of women and men are varied and that this has a profound influence on their needs and aspirations.

GENDER-BLIND
Failure to recognize gender as a determinant of social outcomes that results from implementing projects and policies.

GENDER-NEUTRAL
Any concept, entity, expression, etc., that is not associated with a particular gender. Gender-neutral projects, programs, policies, and attitudes do not consider the diverse roles, needs, and aspirations of different genders separately. They unintentionally perpetuate the status quo and, in some cases, even exacerbate existing inequalities derived from the unequal structure of gender relations.

GENDER DISCRIMINATION
A distinction, exclusion, or restriction based on a person’s sex and/or gender identity. This type of inequality in treatment can be direct (based explicitly on gender) or indirect (apparently neutral law, policy, program, or practice has a discriminatory practical effect in implementation). Gender discrimination can result from individual perception or behaviour or be systemic. Systemic gender discrimination consists of behaviors, policies, or practices that are part of the institutional structures or culture, creating or perpetuating disadvantages for women, girls and those who do not conform to the male/female binary.

GENDER EQUALITY
This entails equal rights, responsibilities, and opportunities for women and men, girls and boys. Rather than requiring women and men to become the same, gender equality ensures that women’s and men’s rights, responsibilities, and opportunities are not contingent on their gender.

GENDER EQUITY
Fairness in treating everyone, regardless of sex or gender identity or expression. The concept recognizes that individuals have different needs, abilities, and powers based on their sex or gender identity. By recognizing these differences then affirmative action can be used to remedy gaps and compensate for historical and social disadvantages preventing individuals from operating as equals to ensure fairness.

GENDER INTENTIONAL
Taking conscious steps to identify and understand gender-based barriers and constraints, followed by actions to overcome them.

GENDER MAINSTREAMING (OR INTEGRATION)
An approach for incorporating the needs and interests of all genders into the design, implementation, and M&E of programs, policies, and organizational processes to ensure that everyone has the opportunity to benefit equally and that actions do not perpetuate inequality.

GENDER-SENSITIVE APPROACH
Ability to understand and acknowledge prevailing gender differences, issues, and inequalities and use them to design and undertake appropriate strategies and actions.

GENDER-POSITIVE APPROACH
Here, gender is central to achieving positive development outcomes. Changing gender norms, roles, and access to resources is a key component of project outcomes.

GENDER-TRANSFORMATIVE APPROACH
It identifies the root causes of gender inequality in financial inclusion before analyzing and transforming inequitable gender norms and power dynamics into positive outcomes that directly enhance gender equity. It aims to give shared and equitable access to resources and power over decision-making. It gives women the same recognition and place in society, communities, and families as men.
Policymakers can use this tool to understand which policies are gender blind/neutral/transformative. Based on the results, policymakers may want to identify key priority areas for policy change/modification and subsequently draw a roadmap to develop gender-transformative policies to enable women’s financial inclusion and overall empowerment.

Please note: This is an indicative tool based on Figure 3 in the toolkit.

<table>
<thead>
<tr>
<th>SR. NO.</th>
<th>INDICATIVE QUESTIONS TO ASSESS THE DEGREE OF GENDER INCLUSIVITY OF SELECTED POLICY</th>
<th>YES/NO</th>
<th>IF YES, THE POLICY IS</th>
<th>REMARKS, IF ANY</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Does the policy consider the same set of opportunities and challenges for all genders?</td>
<td>YES/NO</td>
<td>Gender blind</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Are the legal framework and social construct of the economy patriarchal?</td>
<td>YES/NO</td>
<td>Gender blind</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Are patterns of access to financial services perceived the same for all genders?</td>
<td>YES/NO</td>
<td>Gender blind</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Are the needs and behaviors of men and women regarding the usage of financial services seen as the same?</td>
<td>YES/NO</td>
<td>Gender blind</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Do women need to take extraneous steps to get access to financial services?</td>
<td>YES/NO</td>
<td>Gender blind</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Have the governance and implementation arrangements for policy been drawn without considering the inclusion of women?</td>
<td>YES/NO</td>
<td>Gender blind</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Does the policy’s M&amp;E framework ignore gender differences?</td>
<td>YES/NO</td>
<td>Gender blind</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Are financial inclusion policies designed to meet the needs of end users from different genders?</td>
<td>YES/NO</td>
<td>Gender-sensitive</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Does the government or the policymaker undertake initiatives to understand social norms constraining women’s access to financial services?</td>
<td>YES/NO</td>
<td>Gender-sensitive</td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Are the laws and regulations on financial inclusion enacted with a gendered lens?</td>
<td>YES/NO</td>
<td>Gender-sensitive</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Have policymakers identified challenges women face in accessing financial services and how these can be overcome?</td>
<td>YES/NO</td>
<td>Gender-transformative</td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Have the policymakers worked or are working toward simplifying access to and usage of financial services for women?</td>
<td>YES/NO</td>
<td>Gender-transformative</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Do market stakeholders (such as FSPs) recognize the need and benefits of targeting the women’s market?</td>
<td>YES/NO</td>
<td>Gender-transformative</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Is the institutional infrastructure designed to incentivize stakeholders to cater to women clients?</td>
<td>YES/NO</td>
<td>Gender-transformative</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Is the policy communication tailored to the needs of women users?</td>
<td>YES/NO</td>
<td>Gender-transformative</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>Do policymakers and FSPs have adequate capacity to collect, analyze, and use SDD?</td>
<td>YES/NO</td>
<td>Gender-transformative</td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>Do policymakers take a data-driven approach to devise inclusive policies?</td>
<td>YES/NO</td>
<td>Gender-transformative</td>
<td></td>
</tr>
<tr>
<td>18</td>
<td>Are M&amp;E frameworks in place to track the progress of FSPs in developing gender-sensitive products/services?</td>
<td>YES/NO</td>
<td>Gender-transformative</td>
<td></td>
</tr>
</tbody>
</table>
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SHE Investments, Accelerators.


UN Women, OSAGI Gender Mainstreaming · Concepts and definitions

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UN Women, OSAGI Gender Mainstreaming · Concepts and definitions

UNICEF, UNFPA, UNDP, UN Women. “Gender Equality, UN Coherence and You”


Video. Human Centered Design.


