A TOOLKIT FOR INCREASING GENDER DIVERSITY AND WOMEN’S LEADERSHIP IN FINANCIAL REGULATORY INSTITUTIONS
CONTENTS

INTRODUCTION 3
OBJECTIVES 3
TARGET AUDIENCE 4
PHASE 1. DEFINE - WHERE ARE WE NOW? WHERE DO WE WANT TO BE (AND WHY)? 4
PHASE 2. PLAN 12
PHASE 3. IMPLEMENT 14
PHASE 4. REVIEW - MONITORING AND EVALUATION 18
CONCLUSIONS - KEY DRIVERS TO INCREASE DIVERSITY AND INCLUSION IN FINANCIAL REGULATORY INSTITUTIONS 19
Appendix 1. Commonly used terms/concepts and definitions 19
Appendix 2 Example of Gender Mainstreaming - Central Bank of Jordan (CBJ) 21
Appendix 3 Example of Gender Mainstreaming - National Banking and Securities Commission (CNBV) -Mexico 22
Appendix 4 References 23

ACKNOWLEDGMENTS
This toolkit is a product of AFI’s Gender Inclusive Finance workstream.

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We would like to extend special thanks to PHB Development (consultants) for their contributions to this toolkit.

We would like to thank AFI member institutions, partners, and donors for generously contributing to the development of this publication.

The Gender Inclusive Finance workstream is partially financed by Sweden and other partners.
INTRODUCTION


Its Action Point 10 encourages AFI member institutions to drive greater gender diversity at every level within members’ own institutions through developing effective workplace policies, practices, inclusive activities, as well as diversity and inclusion initiatives.

The ultimate aim is to close the gender gap in women’s access to finance. In 2019 AFI established the Gender Inclusive Finance Ambassadors initiative, which gives recognition to member institutions with strong gender inclusive finance commitments. The initiative serves as a means of encouragement for other member institutions to take similar steps to support women’s financial inclusion and women’s institutional leadership. To date more than 30 member institutions have been recognized for their work including the Superintendency of the Popular and Solidarity Economy, Ecuador and the Central Bank of Cambodia.

Gender diversity at the workplace refers to a balanced representation and participation of different genders in all work areas, including leadership positions. Gender diversity can be achieved when all employees, irrespective of gender, have equal access to resources, opportunities, and privileges. Individuals are faithful to institutions that value, reward, recognize, and protect them: those are the key characteristics of gender inclusive organizations. Promoting institutional gender diversity can only happen if it is consciously pursued through gender transformative policies that benefit individuals, institutions, and societies. Building a gender inclusive institution is complex, time-consuming, and depends on the appetite and willingness of an institution and its workforce.

Given the intersectionality between gender and sociocultural norms, economic status, and cultural stereotypes, gender change initiatives should be approached in an inclusive, coordinated, and systemic manner while ensuring that the dominant gender does not feel it will lose out and thus become unsupportive and resistant to change. Having an institutional leadership with a multidimensional range of interpersonal skills and institutional intelligence to lead the gender change process, is key to its success. Such leadership reinforces accountability and ownership by addressing the inequalities which are often engrained in an organization’s culture.

Building gender diverse organizations is long-term and a challenging undertaking. If it is to have the maximum impact, it should be approached holistically by both men and women, in collaboration with internal and external stakeholders and with support from the top management. While different models and tools for organizational change exist, it is important to choose and design a simple process and effective tool that can identify inequalities and measures to address them effectively.

The inclusion of women brings many benefits to society. It leads to a reduction in poverty, improves the overall living conditions of families, generates jobs, reduces the informality of the economy, leads to an increase in productivity and GDP, and leads to the overall financial well-being of the population.

Jorge Moncayo, the General Technical Manager of the Superintendency of the Popular and Solidarity Economy AFI Gender Inclusive Finance Ambassador Institution
OBJECTIVES

This toolkit is designed to provide practical guidance to financial regulators and policymakers in developing an enabling ecosystem that supports institutional diversity and women’s leadership.

It will help financial regulators and policymakers define their current practices, the existing gaps and the opportunities for progress in institutional gender diversity. Lastly, it will provide good practice examples from the network of member institutions who are making positive progress in this area.

THE TOOLKIT IS STRUCTURED AROUND FOUR MAIN PHASES TO SUPPORT THE GENDER DIVERSITY JOURNEY:

PHASE 1: DEFINE

The first of four main steps suggested by this toolkit is to define what needs to be done and why, what information is available.

PHASE 2: PLAN

Second step, analyze the current situation and plan the vision of the future, including the steps.

PHASE 3: IMPLEMENT

Third step implement the changes the analysis has identified.

PHASE 4: REVIEW

Fourth step review the progress made along the way.

TARGET AUDIENCE

This toolkit is designed primarily for financial regulators and policymakers, as well as financial service providers, regardless of the current phase of their institution’s gender diversity journey.

The toolkit provides practical insights and recommendations. It can be used at team, departmental and institutional level to guide financial industry professionals in adopting a holistic approach to formulate and implement smart policies to promote institutional diversity, women’s leadership, and, ultimately, gender sensitive financial inclusion policymaking.

PHASE 1: DEFINE
WHERE ARE WE NOW AND WHERE DO WE WANT TO BE (AND WHY)?

Under the “Define” phase, the key terms and parameters relating to diversity and inclusion need to be defined and communicated with the relevant stakeholders. A review of the existing landscape regarding gender diversity and inclusion needs to be undertaken to develop a baseline from which to chart progress and a future desired state needs to be identified. An indication of why this state is preferable or beneficial needs to be established, including benefits that this future state may bring.

DEFINE: KEY TERMS AND CONCEPTS

Many broad and highly technical terms relate to diversity and inclusion within the financial inclusion and financial regulatory context. The members of the AFI network do not always use them in the same way as
other types of institutions. These terms and how they are used in the AFI network are covered in great depth in the Words Matter Dictionary.

Some of the most relevant terms used by AFI members have been summarized here (see Appendix 1 for a complete list).

**GENDER DIVERSITY AT THE WORKPLACE:** a working environment where men and women have equal opportunities and representation in recruitment, promotion, leadership, training, and retirement.

**GENDER INEQUALITY:** a legal, cultural, or social situation where gender determines disparate opportunities and rights for women and men, characterized by unequal access to or benefit from rights and assumptions of stereotypical culturally and socially defined roles.2

**GENDER PARITY:** a numerical concept used to determine relative equality in numbers and proportions of men and women, girls and boys. Gender parity addresses the ratio of female-to-male performance or values (or male-to-female) of an indicator under consideration.3

**GENDER SENSITIVITY:** the ability to understand and acknowledge prevailing gender differences, issues, and inequalities and to use them to design and undertake strategies and actions.

**GENDER MAINSTREAMING:** an approach for incorporating the needs and interests of all genders into the design, implementation, and monitoring and evaluation of programs, policies, and organizational processes to ensure that everyone can benefit equally and that actions do not perpetuate inequality.

Most AFI members do not define how they use diversity and inclusion terms in relation to financial inclusion or what constitutes inclusive communication. However, the Banco Central de la República Argentina (BCRA) produced a “Guide for Gender Inclusive Communication” in 2020. This publication aims to “avoid gender-biased communication, sexist statements, stereotypes, and discrimination, and to make all gender identities visible.” The goal is to gradually move from using a male-generic language to one that addresses all genders. The BCRA President, Miguel Ángel Pesce, stated, “Using gender inclusive language is a significant contribution towards a fairer, less discriminatory, and less violent society.”4 Working together as an institution to develop inclusive and institutionally appropriate language, using global good practice as a guide, will support staff in understanding what is positive and inclusive and how to describe best things they may not always be thoroughly familiar with. It is important to take a collaborative approach so that the staff does not see this as something imposed upon them, which could lead to resistance to change or a backlash.

**DEFINE: CURRENT GENDER DIVERSITY AND INCLUSION LANDSCAPE WITHIN FINANCIAL REGULATORY INSTITUTIONS**

AFI members across the regions recognize the multiple reasons behind gender inequality and the need to overcome it. Many of them are working to improve their institutional diversity and rate of women’s financial inclusion and are encouraging the financial institutions they supervise to do the same. Diverse teams make better decisions. Companies with more than 30 percent of women executives outperform those with fewer.5 Therefore, there is a strong business case to make progress in reducing gender inequality. While very few members of the AFI network have yet achieved gender parity across their institutions, many of them are tackling the issue on several fronts.

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1 IGi Global. No Date. What is Gender Inequality.
2 Identify how many people from different genders are at each level.

3 Identify any other indicators that can be used for analysis (e.g., full-time/part-time, home-based/office-based).

4 Collect the required data.

5 Analyze the data and develop targets to move to gender parity across all work strata.

6 Develop an evidence-based action plan/set of recommendations.

7 Publish the findings (optional).

**DEFINE: THE IDEAL FUTURE**

AFI member institutions can use the AFI Maya Declaration commitments to define their future goals for diverse and inclusive institutions. Institutions can also set internal targets and/or benchmark themselves against global good practice examples such as those in this toolkit and AFI’s Special Report on Gender Diversity within AFI Member Institutions.

**ANALYZE: CURRENT GAPS, OPPORTUNITIES, AND THE NEED FOR CHANGE**

AFI member institutions can use the AFI Maya Declaration commitments to define their future goals for diverse and inclusive institutions. Institutions can also set internal targets and/or benchmark themselves against global good practice examples such as those in this toolkit and AFI’s Special Report on Gender Diversity within AFI Member Institutions.

**GENDER AUDITS AND SITUATIONAL ANALYSIS**

Gender audits are an example of analytical studies that can be conducted to help institutions assess the gender issues and dynamics that exist, identify challenges and barriers to gender inclusive change, and plan interventions to address them. Gender situational analysis can be done through a gender audit, like in the case of the Bank of Jordan, or through a gender diagnostic study, like in the case of the Inter-institutional Committee for Gender Equality in Financial Institutions (CIIGEF), Mexico.
MEMBER HIGHLIGHT / GENDER AUDIT IN THE CENTRAL BANK OF JORDAN

In 2018, the Central Bank of Jordan (CBJ) expressed its interest and commitment to developing a gender sensitive policy. Based on the high level of commitment, Hivos\(^7\) conducted a Participatory Gender Audit (PGA) of the CBJ between April and November 2018. First, a literature review was carried out to gain a deep understanding of the organizational culture of the bank. This was followed by an audit preparatory workshop to familiarize the bank employees (middle and senior management) with the concepts of gender and PGA and their purpose to get the management’s buy-in and commitment. All bank employees were given a questionnaire to assess their understanding, consciousness, and awareness of gender issues. This was supplemented by interviews with the bank’s managers and five focus group discussions. The PGA covered all four quadrants of the Gender at Work Framework (GWF), focusing on the bank’s internal policies and practices (quadrant 4).\(^8\) The audit focused on assessing and identifying gender gaps at individual, business unit, and institutional levels. The results of the gender analysis were translated into an Action Plan, which was presented to the management with recommendations to strengthen the gender mainstreaming approach in the bank’s policies, programs, and structures.\(^9\)

Policymakers and regulators can follow these steps, to assess, and then improve, the current gender diversity and inclusion balance in staffing:

1. Review the existing literature, policies and procedures
2. Identify the scope and parameters of the audit
3. Identify the indicators and the audit questions
4. Test the audit questions out through engagement with stakeholders and then edit as needed
5. Undertake the audit to gather quantitative and/or qualitative data
6. Analyze the audit data and triangulate the findings through stakeholder engagement
7. Develop an action plan or recommendations from the findings
8. Publish the findings (optional)

A gender analysis should be well-defined, planned, developed inclusively, and supported by the top management. It should aim to get a holistic picture of the gender gaps and gender inequalities in the institution. The analysis should cover specific participatory questions (i.e., administered to all employees, regardless of gender or position). The gender analysis should then identify what needs to be changed and the rationale for the change, laying the foundation for interventions for the next phase of developing actions to be undertaken for a more gender balanced and inclusive institution.

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\(^7\) Humanist Institute for Development Cooperation (Hivos) is an international Dutch organization which supports civil society organizations to achieve a free, fair, and sustainable world where all citizens, women, and men, have equal opportunities to develop.

\(^8\) Gender at Work. No Date. Gender at Work Framework.

\(^9\) AFI Key Informant Interview May 2022
with limited additional flexibility in their work role to compensate. This leaves many women unable to progress in an institution or even having to leave, as they are not given the opportunity to undertake both roles and are forced to choose.

"From a personal perspective, being a single mother and holding a leadership role is not easy as you need to find a balance between the two."

Key informant interviewee, Central Bank of Seychelles

Unless the government and institutional policies help shift these societal norms and divide family responsibilities equally with men, mothers in the workplace will continue to be left behind by systems that do not accommodate their needs.
On average, all AFI members offer paid maternity leave for 100 days, and nearly 80 percent of surveyed AFI members offer paid paternity leave, on average, for 6.4 days only. This demonstrates there is a vast discrepancy in how men and women can care for their children. Some good practice examples from across the network are highlighted below.

**MATERNITY LEAVE ACROSS AFI MEMBER INSTITUTIONS**

**BANGKO SENTRAL NG PILIPINAS, THE PHILIPPINES**
Pursuant to Act No. 11210 on the 105-Day Expanded Maternity Leave Law of the Republic of the Philippines, female employees are entitled to 105 days of maternity leave paid at 100 percent of their average daily salary scale rate. Under the Solo Parent Welfare Act of 2000, a qualifying female solo parent is allowed 15 days of (additional) paid leave with an option to extend for 30 days without pay.

**FINANCIAL REGULATORY COMMISSION, MONGOLIA**
Provides 120 days of paid maternity leave and up to three years of unpaid.

**THE ROYAL MONETARY AUTHORITY, BHUTAN**
Provides six months (approximately 182 days) of paid maternity leave.

**COMISIÓN NACIONAL BANCARIA Y DE VALORES MÉXICO, MÉXICO**
Pursuant to Article 124 of the current Regulations on Medical Services of the Institute of Security and Social Services for State Workers of the Republic of Mexico, the Comisión Nacional Bancaria y de Valores (CNBV) grants maternity medical leave to insured pregnant women for a period of 90 calendar days, 30 of which will be intended to protect the mother before the approximate date of delivery and the remaining 60 dedicated to maternal care.10

**PATERNITY LEAVE ACROSS AFI MEMBER INSTITUTIONS**

**BANGKO SENTRAL NG PILIPINAS, THE PHILIPPINES**
If applicable, this AFI member provides a maximum of seven days of paid paternity leave under the Paternity Leave Act of 1996. In addition, a female employee entitled to maternity leave may, at her discretion, allocate up to seven working days of her paid leave to the child’s father, regardless of marital status. In total, father-employees may take a maximum of 14 days of paternity leave.

An institution can review its parental leave policies through a policy review, as outlined below.

1. Is there a policy in place?
2. If not, create a plan and timeline for developing a policy
3. If there is a policy, does it cover both maternity and paternity leave?
4. Identify good global practices to see what is relevant and can be applied to the institution’s policy
5. Can a new parental leave policy be developed to cover all types of parental leave (adoption leave, surrogacy leave, multiple or caesarean births)?
6. If not, can the leave allowances be more aligned with mothers’ (or the primary carers’) needs?

Institutions can help address the needs of women by offering incentives to attract and retain women professionals at different levels, especially if they become mothers, and by offering them a smooth transition back to work to continue their careers. Shared parental leave is not yet standard, but an opportunity for the future.

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10 AFI Key Informant Interview May 2022
Several initiatives by AFI members to support parents and help members retain their staff range from costly options (subsidized nursery care) or after-school care to lower-cost options (institutionally-wide family day) (Table 2).

### TABLE 2: WORKPLACE INITIATIVES TO SUPPORT PARENTS AND THOSE WITH CARE RESPONSIBILITIES

<table>
<thead>
<tr>
<th>WORKPLACE INITIATIVES TO SUPPORT PARENTS AND THOSE WITH CARE RESPONSIBILITIES</th>
<th>NO. OF INSTITUTIONS WITH EACH INITIATIVE</th>
<th>INSTITUTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>VARIOUS TYPES OF FLEXIBLE WORKING OPTIONS</td>
<td>12</td>
<td>Banco Central de Reserva de El Salvador, Central Bank of the Bahamas, Bank of Namibia, Bank of Zambia (breastfeeding mothers only), Superintendencia de Economía Popular y Solidaria Ecuador, BNM, Superintendencia de Bancos Ecuador, Bank of Uganda, CNBV, Bank of Ghana, National Bank of Rwanda, Palestine Monetary Authority</td>
</tr>
<tr>
<td>LACTATION AND/OR BREASTFEEDING FACILITIES</td>
<td>9</td>
<td>Bangko Sentral ng Pilipinas, Banco Central de Reserva de El Salvador, Superintendencia de Economía Popular y Solidaria Ecuador, BNM, Superintendencia de Bancos Ecuador, Reserve Bank of Vanuatu, CNBV, Central Bank of Paraguay, National Bank of Rwanda</td>
</tr>
<tr>
<td>SUBSIDIZED NURSERY OR AFTER-SCHOOL CARE</td>
<td>5</td>
<td>Banco Central de Reserva de El Salvador, Central Bank of The Bahamas, BNM, CNBV, Banco Central de São Tomé e Príncipe</td>
</tr>
<tr>
<td>OCCUPATIONAL HEALTH</td>
<td>3</td>
<td>Superintendencia de Economía Popular y Solidaria Ecuador, Superintendencia de Bancos Ecuador, BNM</td>
</tr>
<tr>
<td>FAMILY AND/OR MOTHER’S DAY</td>
<td>1</td>
<td>Bank of Zambia</td>
</tr>
<tr>
<td>TRANSPORT PROVIDED BY THE INSTITUTION</td>
<td>1</td>
<td>Superintendencia de Economía Popular y Solidaria Ecuador</td>
</tr>
<tr>
<td>SCHOOL TUITION SUBSIDIES OR SCHOLARSHIPS</td>
<td>1</td>
<td>Superisubsidiescia de Bancos Ecuador</td>
</tr>
</tbody>
</table>
ANALYSIS: THE PUBLIC SECTOR AS A ROLE MODEL IN CONTRIBUTING TOWARDS GENDER EQUALITY

AFI members are public sector actors. As such, they follow the applicable positive legislation of the country. They are responsible for acting as role models to influence their countries’ wider financial services ecosystem. They can do so by, among other things, adopting policies against gender discrimination and supporting equal pay at every job level.

All AFI institutions have various human resources policies. First and foremost, there is an opportunity to examine these policies and understand how they may impact different genders differently. Secondly, there is an opportunity to look at how existing policies can be amended, or new policies developed, that support equal opportunities for all. Sometimes equal opportunities are enshrined in law, but institutional-level policies and directives can be issued on other occasions.

An equal opportunities policy audit is a useful tool to understand the level of equal opportunities in the institution, and it can be undertaken using the following steps:

1. Identify the scope and parameters of the audit
2. Review good global practices for family-friendly policies and identify what is relevant to your context
3. Define the types of family units that will be included
4. Define the types of family policies that should be included in the audit
5. Identify the indicators and the audit questions
6. Audit
7. Analyze the data
8. Develop an action plan or recommendations from the findings
9. Publish the findings (optional)

MEMBER HIGHLIGHT / HOW THE CNBV, MEXICO, ENSHRINED EQUAL EMPLOYMENT OPPORTUNITIES IN THEIR HUMAN RESOURCES POLICIES

The CNBV’s Labor Equality and Non-Discrimination Policy establishes, among others, that all personnel who collaborate in the institution have the obligation to “provide equal employment opportunities for all CNBV personnel based on their skills and experience.” In addition, the CNBV considers the Professional Career Service Law (Ley de Servicio Profesional de Carrera, 2003). The employment opportunities are developed in strict adherence to the principles of legality, efficiency, objectivity, quality, impartiality, equity, competence by merit, and gender equality. The whole employment opportunity process and the decisions of the Technical Selection Committee are based on the Law on the Professional Career Service in the Federal Public Administration. This law established a unified career civil service and covers career planning, the national HR register, civil service recruitment, professional development, training and certification, performance evaluation, and separation.

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A TOOLKIT FOR INCREASING GENDER DIVERSITY AND WOMEN’S LEADERSHIP IN FINANCIAL REGULATORY INSTITUTIONS
Each KPA should have clear objectives and key performance indicators (KPIs) to facilitate the monitoring and evaluation of the intervention. An action plan should be developed and implemented for each KPA and the intervention. The KPA action plan is best staggered over a period of 1-3 years to ensure complete focus and effective implementation, commensurate with gender-balanced human resources and gender sensitive budgeting.

The KPA action plan details the objective for the priority area, activities, targets with responsible stakeholders, and a timeframe for each intervention. The development of each action plan should be done separately but they should all be linked in an overarching document/master plan. Due care should be taken to ensure allocated resources are optimally utilized to achieve the targets. The activities should reflect the extent of stakeholders’ support, degree of intended impact and be aligned with the gender-related programs of the institution.

### TABLE 3: SAMPLE KPA ACTION PLAN TO PROMOTE BALANCED WORKFORCE COMPOSITION AT ALL LEVELS

<table>
<thead>
<tr>
<th>OBJECTIVES</th>
<th>ACTIVITIES</th>
<th>TARGETS / TIMEFRAME</th>
<th>RESPONSIBILITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>HAVE A BALANCED AND INCLUSIVE WORKFORCE</td>
<td>COLLECT AND ANALYZE gender-disaggregated data on workforce composition at all levels</td>
<td>Workforce composition dashboard by Year 1</td>
<td>✓ Human Resources Department</td>
</tr>
<tr>
<td></td>
<td>PROMOTE fair recruitment, pay and performance appraisals</td>
<td>30% FEMALE representation by Year 2</td>
<td>✓ IT Department</td>
</tr>
<tr>
<td></td>
<td>ORGANIZE gender awareness programs for senior and HR staff</td>
<td>50% FEMALE representation by Year 3</td>
<td>✓ Gender Committee</td>
</tr>
<tr>
<td></td>
<td>DEVELOP gender indicators for monitoring progress and target achievement</td>
<td></td>
<td>✓ Gender secretariat</td>
</tr>
</tbody>
</table>

Source: PHB creation
The Central Bank of Jordan was supported by Hivos to assist in creating a gender balanced and inclusive workforce in achieving gender equality. Based on the participatory gender audit and the two-level findings, a set of activities were recommended under the “Plan” phase to the bank for implementation.

**MEMBER HIGHLIGHT / HOW THE CENTRAL BANK OF JORDAN, INTEGRATED GENDER MAINSTREAMING IN ADVANCING GENDER EQUALITY IN THE BANK**

**DEFINE PHASE**

Hivos conducted the gender audit of the CBJ to assess the bank’s policies, practices, and pertaining structures and identify gaps, challenges, opportunities, and recommendations to strengthen gender mainstreaming in achieving gender equality.

**THE KEY FINDINGS WERE:**

**INTERNAL**

- 51% Female employees
- 37% Women in leadership positions
- 1% People with disabilities (4% is a legal requirement)
- Non-discriminatory policies and procedures (recruitment, salaries, opportunities)
- Low unconscious bias
- 90 days of maternity leave (70 days is a legal requirement)
- No nursing hours after maternity leave
- Demand for longer paternity leave (2 days as per the Labor law)
- No Gender unit in the bank

**EXTERNAL**

- Lack of a safe transportation network negatively affects women
- No in-house nursery (Ministry of Social Development rejected the proposal)
- Discriminatory retirement age (Jordan’s civil service bylaw): 65 for men vs. 55 for women. This deters women from reaching leadership positions
- Social norms manifest in gender roles discouraging married women from working night shifts

**PLAN PHASE**

Hivos presented the following recommendations:

**INTERNAL**

- Create a supporting environment for people living with seen or unseen disabilities
- Conduct gender awareness programs to demystify gendered beliefs in young employees
- Encourage and increase women leadership pipeline through mentorship and merit-based selection
- Strengthen two-way communication between employees and management on the bank’s policies and procedures
- Provide safe transportation facilities and flexible working schedules to facilitate and encourage female employees to work overtime
- Provide longer paternity leave to male employees
- Provide nursing hours to breastfeeding mothers without it affecting maternity leave
- Provide designated smoking areas, tea pantries and other inclusive workplace facilities
- Establish a Gender unit for gender mainstreaming activities
- Develop a gender-equitable and inclusive policy

**EXTERNAL**

- Consider the possibility of appointing a merit-based female governor to promote women’s leadership and create women role models
- Provide options, but not mandating, for women to retire at 60 years of age, currently it is 55 years of age
- Establish a nursery in full compliance with the requirements of the Ministry of Social Development

A Training needs assessment (TNA) effectively identifies the staff’s organizational, operational, and individual training needs and existing gender-based differences. Identify if a TNA has previously taken place. If not, create a plan and timeline for a TNA. Review good global practice for different types of diversity and inclusion, gender sensitivity, and leadership training, and align with what is culturally appropriate or may be adapted to your national context. Identify the goals and outcomes you want to achieve with the TNA. Identify the indicators you will need and the TNA questions for staff. Undertake the TNA, and ensure data is disaggregated. Analyze the data. Identify the types of training needed and the groups that need it. Develop an annual capacity-building program.

The “Implement” phase should bring together all the work completed in the previous phases and implement the action plan to bring about the expected institutional change.

The action plan should be supplemented by a communication plan. The support of internal and external stakeholders should be garnered to facilitate the smooth execution of the policy. The communication plan should be clear and compelling. The target audience should understand the need and rationale for the policy, be equipped with the skills and tools to promote the policy and be motivated to advance the agenda with full ownership and accountability.

**PHASE 3: IMPLEMENT**

**IMPLEMENT: THE IMPORTANCE OF CAPACITY-BUILDING AND TRAINING**

Often, institutions that consider themselves gender neutral do not recognize that they may have an inherent gender bias in their organization. If institutions want to effect long-term change, they must commit to educating all their staff to be sensitized to the new policies and procedures that might be put in place. Understanding the cultural context of the member jurisdiction is essential when developing any capacity-building activities, to ensure that they are appropriate and will be well received by participants.

Types of diversity and inclusion can include: the difference between diversity and inclusion, unconscious bias, identifying microaggressions, being an effective ally, countering workplace harassment, anti-discrimination, and gender sensitivity.

Training that supports a pipeline of future (women,) leaders can include mentoring and/or coaching programs, and leadership, negotiation, and technical skills. This type of training can also be adapted to the needs of other disadvantaged or minority groups within the workplace, to build a truly diverse and fully inclusive institution.

In other cases, training courses are provided specifically for women. For example, the Palestinian Monetary Authority has a course to enhance the technical and leadership skills of their female staff so they can be qualified for a promotion.

**MEMBER HIGHLIGHT / THE BANK OF GHANA IS COMMITTED TO PROMOTING AND EMPOWERING WOMEN FOR AND AT LEADERSHIP LEVELS**

Various courses are held locally and internationally for women from the middle to the top management level. Currently, the capacity of women at the middle management level, is being built through the Female Future Programme. This is a flagship training program is established in four key countries in Africa, including Ghana and is organized by the Confederation of Norwegian Enterprise in collaboration with the Ghana Employers Association. The outcomes are yet to be realized, as the very first cohort, made up of five middle-level female staff, completed practical training in leadership, board competence and rhetoric in December 2021.

A Training needs assessment (TNA) effectively identifies the staff's organizational, operational, and individual training needs and existing gender-based differences.

1. Identify if a TNA has previously taken place
2. If not, create a plan and timeline for a TNA
3. Review good global practice for different types of diversity and inclusion, gender sensitivity, and leadership training, and align with what is culturally appropriate or may be adapted to your national context
4. Identify the goals and outcomes you want to achieve with the TNA
5. Identify the indicators you will need and the TNA questions for staff
6. Undertake the TNA, and ensure data is disaggregated
7. Analyze the data
8. Identify the types of training needed and the groups that need it
9. Develop an annual capacity-building program
IMPLEMENT: MENTORING PROGRAMS FOR MINORITY GROUPS

Senior men are more likely to mentor younger men than younger women.\(^{11}\) Having women role models to look up to and mentors to enhance women’s career paths is important for women to feel confident and supported in their career development. A mentor can also facilitate opportunities for the mentee that might not be available otherwise. Several institutions are already delivering mentoring initiatives within their organizations.\(^{12}\) Interestingly, there appears to be a link between mentoring, women leaders in the organization, and a higher-than-average rate of women staff and managers/board members.

Institutions can choose to follow these steps to implement mentoring programs:

1. Define the institution’s goal for establishing a mentoring program
2. Is there an existing institutional program in place?
3. What focus does it have on minority groups? How can this be changed if none or limited?
4. Identify good global practices to see what is relevant for workplace mentoring for minority groups, diversity and inclusion, and women’s leadership
5. Identify if there are any ongoing informal mentoring activities in the workplace
6. Engage with potential mentors and mentees and collaborate to outline the mentoring process for the workplace
7. Select program participants
8. Match mentors and mentees
9. Provide mentorship training
10. Test pilot the program, analyze the results over a given period, make any necessary adjustments, and launch the program
11. Develop an ongoing monitoring and evaluation mechanism for the program with continuous feedback loops

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11 Wharton School of the University of Pennsylvania. 2007. Workplace Loyalties Change, but the Value of Mentoring Doesn’t.
12 AFI Member Survey June 2022

\[ I \text{ wish and hope for a level playing field during my daughter’s generation where women can thrive as equally as men, irrespective of their gender.} \]

Key informant interviewee, Central Bank of Seychelles
Raising awareness about what needs to happen, why it is happening, and the benefits it will bring is significant, as there needs to be not only acceptance but adoption of policies and practices that fully embrace diversity and inclusion practices by the employees of the institution.

There are many ways to raise awareness, including:

- Awareness-raising campaigns, either internally or with other national level-stakeholders, where collaborative activities with a broader impact can be undertaken.
- Creating and publishing relevant publications or developing a website or social media content.
- Developing an annual communications plan (see AFI’s Communicating Women’s Financial Inclusion for guidance).
- Establishing an institutional or national-level body to be the ambassadors for these initiatives and ensure men are active participants.

All the highlighted activities planned and undertaken mustn’t happen in a vacuum. Creating awareness and supporting the delivery mechanisms for the various initiatives is a key component to ensuring their success.

**MEMBER HIGHLIGHT / CREATING AWARENESS TO ENACT LONG-TERM CHANGE: AN EXAMPLE OF HONDURAS**

In Honduras, the National Banking and Insurance Commission has focused on creating a financial inclusion plan for women since 2019. To this end, they received support from the Toronto Center, which helped them structure a three-staged plan. The first stage was the collection and reporting of high value and quality information. The second stage was the analysis of the information and the third and final stage was use of information for the design of policy interventions.

They started by the first stage looking at the internal culture of the National Banking and Insurance Commission, their policies (hiring and other human resource policies), the percentage of male and female employees, the management positions, etc. They also conducted surveys among the employees to gauge their awareness of the importance of gender issues. This allowed them, in the second stage, to make a diagnosis and develop a tailored training process to create awareness among the employees about the importance, process, and positive terms and definitions regarding gender equality and diversity in the workplace. They also emphasized the importance of becoming gender sensitive, or even gender transformative, as a regulator and its impact on the institutions they supervise.

Support from the Toronto Center specialists has created a long-term change in the institution. They have created a Women’s Financial Inclusion Committee, which continues to carry out various awareness-raising activities with strategic allies such as the National Women’s Institute. They have also developed a gender policy within the institution, pending approval by the new authorities. As a commission, they have a budget for financial education activities focused on internal or external gender issues. They also carry out some campaigns focused on the women of the commission and campaigns based on the findings of the gender gap reports.

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13 Comisión Nacional de Bancos y Seguros. Available at: [https://www.cnbs.gob.hn/inclusion-financiera-mujeres/](https://www.cnbs.gob.hn/inclusion-financiera-mujeres/)
MEMBER HIGHLIGHT / THE NATIONAL BANK OF CAMBODIA HAS CREATED A WOMEN’S COMMITTEE

The National Bank of Cambodia (NBC) has a Women’s Committee consisting of 11 members, all female, and chaired by the Deputy Governor of the NBC, H.E. Ms. Ouk Maly. The Women’s Committee is primarily responsible for overseeing and furthering the women’s agenda in NBC. Its terms of reference include: representing the NBC, participating in events organized by local and international organizations, organizing International Women’s Day activities in the NBC, arranging awards or recognition for women officials, and preparing reports and required documents about the women-related agenda for submission to the top management. The Women’s Committee has successfully organized the International Women’s Day celebrations on 8 March 2022.

The role of men in supporting gender diversity and women’s leadership within an organization is crucial. All genders should receive training and gender sensitization courses to ensure they see each other as members of the same team, not as rivals. As the Deputy Governor of the Central Bank of Ghana stated, “The role of men is very important in the Bank’s scheme of things. The ladies have formed an association to fulfill, protect, and champion their needs at the Bank. It was established as an internal women’s network to create connectivity between women at all staff levels, which could lead to mentoring relationships and greater visibility of role models. The men, however, form the backbone of the association and are rightly recognized as the ‘iron rods’ of the ladies’ pillars of strength.’ There is a lot of cooperation and collaboration between the men and women.

MEMBER HIGHLIGHT / GENDER MAINSTREAMING AND THE IMPORTANCE OF INCORPORATING MEN: AN EXAMPLE FROM THE CNBV, MEXICO

In Mexico, the CNBV’s annual training program includes specific topics how to identify, prevent, and take action on cases of discrimination, human rights abuses in the workplace, inequality, and how to positively support non-discrimination and labor inclusion. In 2021, 442 public servants (including 66 percent of women) participated in courses related to equality and non-discrimination (gender equality, gender-based violence, harassment and sexual harassment, and prevention of discrimination).

Emphasis on the important role men play in the transition towards gender equality has also been presented. In 2021, CNBV staff were invited to participate in a forum entitled “Deepening the understanding of co-responsibility to pave the way towards conciliation” and an online symposium, “Resignifying masculinities and fatherhood.” These events dealt with topics such as: Hegemonic masculinity as a risk factor; Privileges of masculinity in the exercise of human rights; Self-care is also a men’s issue; Parenthood in times of COVID-19; The right to exercise co-responsible and affective parenthood; and Men as potential allies in public policies for gender equality. These events were organized by the Gender Equality Unit of the Ministry of Finance and Public Credit of the Republic of Mexico.

These provisions and the policies that are implemented as part of gender mainstreaming at the federal level seek to ensure greater equality of employment opportunities and eradicate gender violence in Mexico. This work is important considering that there are still many gender biases which favor men in work environments, this could be due to men’s affinity with other men, valuing men’s performance over that of women, or because women are associated with domestic and reproductive roles and not the professional realm.

14 AFI Key Informant Interview, May 2022
15 AFI Key Informant Interview, May 2022
Steps to consider for creating awareness of gender diversity and inclusion include the following:

1. Define the purpose, aims, objectives and parameters of the body
2. Define the composition and remit
3. Develop terms of reference for the members
4. Identify the composition/skill set needed from the members of the body
5. Advertise (ideally) or appoint members to the body
6. Appoint a chair/co-chair
7. Convene the body regularly, and ensure their work is transparent and well-promoted
8. Encourage wider engagement from other staff members and stakeholders in the wider ecosystem
9. Celebrate successes as they happen and provide recognition to those involved

PHASE 4: REVIEW: MONITORING & EVALUATION

All the activities and initiatives of the gender sensitive intervention need to be reviewed to understand how they are progressing, if they are on target to achieve their goals, and if they will generate the needed impact. Reviews can be undertaken at various points. However, they should be indicated from the start, and the review process should be built in at the design stage.

The ongoing/periodic monitoring facilitates revision and refinement of interventions while they are in progress, so a change, of course, can be made, if needed. The evaluation is typically undertaken at set intervals, such as the midpoint and end of an initiative. This helps identify the different effects (intended, unintended or neutral) of gender interventions and facilitates the adaption of interventions in case of unintended or negative impact, which could further perpetuate gender inequalities.

Institutions can choose to follow these steps to implement monitoring and evaluation programs:

<table>
<thead>
<tr>
<th>MONITORING</th>
<th>EVALUATION</th>
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<tbody>
<tr>
<td>Continuous monitoring</td>
<td>Post evaluation</td>
</tr>
<tr>
<td>Collect quality data and information</td>
<td>Select an evaluation methodology and formulate questions</td>
</tr>
<tr>
<td>Analyze the data against the baseline and key performance indicators to assess the progress</td>
<td>Measure outcomes against objectives, targets, and goals</td>
</tr>
<tr>
<td>Identify key performance areas with little or no progress</td>
<td>Identify positive, negative, and neutral effects of the intervention</td>
</tr>
<tr>
<td>Discuss and decide which activities should be changed, revised, or stopped</td>
<td>Adapt interventions in case of negative or neutral effects</td>
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<tr>
<td>Revise and refine objectives and activities</td>
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APPENDIX 1: COMMONLY USED TERMS/CONCEPTS AND DEFINITIONS

Language shapes our perceptions of the world. The words we use shape how we think and speak about others. The AFI Words Matter Financial Inclusion Dictionary serves as a guide for AFI staff, members, and stakeholders to understand how AFI interprets and employs various terms and concepts.

GENDER

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

GENDER ANALYSIS

A systematic examination of differences in opportunities and constraints an individual or group faces based on their sex and gender identity. Gender analysis explores social relationships and gender differences across domains, including the gendered division of labor, access to and control over resources, decision-making power, and the opportunities for advancing gender equality.

GENDER AUDIT

A process based on a participatory methodology to promote learning at the individual, work unit, and organizational levels on mainstreaming gender practically and effectively. This is, essentially, a “social audit” similar to “quality audits” as opposed to “financial audits.”

GENDER BALANCE OR EQUAL REPRESENTATION/PARTICIPATION

The equal participation of women and men in all areas of work (international and national) at all levels, including senior positions. It also covers programs agencies initiate or support (e.g., education, healthcare, and food distribution programs) and politics.

GENDER BIAS

Prejudiced actions or thoughts that affect a person or a group based on their perceived gender. Such bias results in unequal and/or unfair treatment, including gender-based discrimination in the workplace or gender stereotyping in the media. It also leads to unequal and unfair access to resources such as income, food, health care, land ownership, and education. Gender bias can be conscious or unconscious, explicit or implicit. It can occur in the public sphere, such as in access to financial services or documentation required for bank accounts and in the private sphere within households.

GENDER BLIND

Failure to recognize gender as a determinant of social outcomes resulting from the implementation of projects and policies.

GENDER CONSIDERATIONS

The way of looking at how social norms and power structures affect the lives and opportunities available to women and men in different life areas.

GENDER DIFFERENCES

A social and cultural approach to understanding the differences in attributes of men, women, girls, and boys, and roles and responsibilities of men and women. Gender-based roles and other attributes can change over time and in different cultural contexts. Expectations about the characteristics, attitudes, and behaviors of women and men (femininity and masculinity) also vary. These differences can be used to understand how varying practices appear to legitimize the discrepancies between sexes.

GENDER DISCRIMINATIONS

A distinction, exclusion, or restriction made based on a person’s sex and/or gender identity rather than on their merit or skills. This type of inequality in treatment can be direct (a difference in treatment is based explicitly on gender) or indirect (when an apparently neutral law, policy, program, or practice has a discriminatory effect in practice). Gender discrimination can result from individual perception and application or be systemic. Systemic gender discrimination consists of behaviors, policies, or practices that are part of the structures or
culture of an institution and that create or perpetuate disadvantages for women and girls and for those who do not conform to the male/female binary.

**GENDER DIVERSITY**

In this document, gender diversity refers to a working environment where women have equal opportunities compared to men in recruitment, promotion, leadership, training, and retirement.

**GENDER EQUALITY**

Equal rights, responsibilities, and opportunities for women and men, girls, and boys. Rather than requiring women and men to become the same, it is to ensure that women’s and men’s rights, responsibilities, and opportunities do not depend on their gender.

**GENDER EQUITY**

Fairness in the treatment of all people 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, with the differences being identified and addressed to rectify inequities. To ensure fairness, affirmative action can be used to remedy gaps and compensate for historical and social disadvantages that prevent individuals from operating as equals.

**GENDER GAP**

The difference between women and men, boys and girls, in society based on gendered norms and expectations. Gender gaps represent the unequal distribution of resources, opportunities, and outcomes and usually become apparent through the analysis of gender data that reveals the extent of the inequalities.

**GENDER IDENTITY**

A person’s own sense of being male, female, or another identity beyond this binary and how they choose to manifest this externally.

**GENDER INCLUSIVE**

Open and inclusive to everyone regardless of gender identity and/or expression.

**GENDER LENS**

A perspective on issues with particular attention to how gender differences and relations can impact investments and project actions. It can be used to analyze power structures and roles in various contexts where it can provide insights into the effect of action (investment or project) on imbalances in gender power relations.

**GENDER MAINSTREAMING**

An approach for incorporating the needs and interests of all genders into the design, implementation, monitoring, and evaluation of programs, policies, and organizational processes to ensure that everyone can benefit equally and that actions do not perpetuate inequality.

**GENDER NEUTRAL**

A concept, an entity, or a language style not associated with the male or female genders. A gender neutral policy or regulation does not consider the needs of different genders. In practice, it is frequently gender blind as it does not account for systematic, embedded, or internalized bias.

**GENDER SENSITIVITY**

The ability to understand and acknowledge prevailing gender differences, issues, and inequalities and to use them to design and undertake strategies and actions.

**GENDER UNIT**

The Gender Unit is responsible for coordinating, monitoring, and evaluating the gender mainstreaming of policies and procedures at the organizational level.

**INTERSECTIONAL ANALYSIS**

Analysis of intersectionality to determine the constraints and opportunities of gender identity, understand the differences, and ensure equal opportunities for all.

**INTERSECTIONALITY**

A framework to understand how race, ethnicity, gender, sexuality, disability, and other aspects of individual
identity might combine and exacerbate the exclusion or discrimination of particular groups. It refers to the overlapping of disadvantages and is critical in understanding the challenges experienced by sexual and gender minorities in socially unstable, fragile, and conflict-affected areas. An intersectional approach is critical to understanding additional barriers to accessing basic services, extra protection challenges in situations of forced displacement, and vulnerability to sexual and gender based violence.

**MALE ALLY**

Men who associate with, cooperate with, and support women and deliberately engage in and avidly support gender inclusion programs.

**PATRIARCHY**

A system of society or government that allows and justifies men holding the greater balance of power and economic and societal benefit and resources. This power is often used to marginalize and oppress others.

**APPENDIX 2: GENDER AT WORK FRAMEWORK (GWF)**

The Gender at Work Framework (GWF) helps develop and conduct gender climate analysis as well as plan gender mainstreaming interventions to achieve the gender equality objectives. The GWF has four quadrants and shows the interrelationship between the individual’s access to resources and their own consciousness and capability and then between the formal rules and policies laid down in a system and the informal norms and exclusionary practices. It describes how changes can occur at an individual and systemic level. Whereas changes in consciousness, awareness, and access to resources and opportunities happen at an individual level, changes in formal policies, informal norms, and deep structures happen at the systemic level. Changes on the formal side are tangible and usually precede changes on the informal side, which are difficult to initiate because they consist of unconscious bias, informal norms, and culture.

*Source: Gender at Work and UNDP.*

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16 ibid

APPENDIX 3: EXAMPLE OF GENDER MAINSTREAMING IN THE CNBV, MEXICO

DEFINE PHASE (OTHER PHASE ARE YET TO BE UNDERTAKEN)

On 20 March 2022, the CNBV, Mexico, established the CIIGEF in partnership with financial entities to promote gender equality and an inclusive financial sector.

CIIGEF carried out a Gender diagnostic study to assess and evaluate the progress and effectiveness of gender mainstreaming activities among Mexican financial service providers and financial regulators. The study focused on three areas: gender equality in the workplace, gender gaps in leadership positions, and women-centric financial products and services. The key findings were the following:

| 1. GENDER PERSPECTIVE ON FINANCIAL SERVICE PROVIDERS AND PUBLIC ENTITIES |
|---|---|---|---|---|---|---|
| 68% | 54% | 44% | 50% | 25% | 13% |
| have a gender equality policy or practice | have a committee to address issues relating to equality and non-discrimination | carried out awareness programs on labor equality and non-discrimination | developed and implemented training programs on labor equality, non-discrimination, human rights, or gender perspective | have longer disability-related, maternity, and paternity leave than legally required | had gender equality or gender inclusive finance-related credentials or certifications |

| 2. WOMEN IN LEADERSHIP POSITIONS |
|---|---|---|---|
| 51% | 28% | 25% | 48% |
| Female employees in total workforce | Women in managerial positions | Women in high-level positions | Female employees hired |

| 3. WOMEN-SPECIFIC FINANCIAL PRODUCTS AND SERVICES |
|---|---|---|---|
| 14% | 60% | 44% | 20% |
| have at least one product designed especially for women | regard women as having better financial behavior | acknowledge that women’s needs for financial products differ from men’s | of the 40% have products or services with gender attributes |

Source: CIIGEF, Diagnóstico de la incorporación de la perspectiva de género en el que hacer de las entidades financieras de México (Diagnosis of gender mainstreaming in financial institutions in Mexico).
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## ACRONYMS

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>AFI</td>
<td>Alliance for Financial Inclusion</td>
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<tr>
<td>BCRA</td>
<td>Banco Central de la República Argentina</td>
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<td>BNM</td>
<td>Bank Negara Malaysia</td>
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<tr>
<td>CBJ</td>
<td>Central Bank of Jordan</td>
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<tr>
<td>CNBV</td>
<td>Comisión Nacional Bancaria y de Valores</td>
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<tr>
<td>CIIGEF</td>
<td>Inter-institutional Committee for Gender Equality in Financial Institutions</td>
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<tr>
<td>GWF</td>
<td>Gender at Work Framework</td>
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<tr>
<td>KPA</td>
<td>Key Priority Areas</td>
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<td>NBC</td>
<td>National Bank of Cambodia</td>
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<tr>
<td>PGA</td>
<td>Participatory Gender Audit</td>
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<tr>
<td>TNA</td>
<td>Training Needs Assessment</td>
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A TOOLKIT FOR INCREASING GENDER DIVERSITY AND WOMEN'S LEADERSHIP IN FINANCIAL REGULATORY INSTITUTIONS