THE ROLE REGULATORS PLAY IN CLOSING THE FINANCIAL INCLUSION GENDER GAP: A CASE STUDY OF UGANDA

CASE STUDY

CONTENTS

ACKNOWLEDGMENTS

This case study is the product of AFI's Gender Inclusive Finance workstream.

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We would like to extend a special thanks to ConsumerCentriX Sàrl (consultants) for their contribution to this case study.

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.

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ABOUT THE AFI GENDER INCLUSIVE FINANCE MAPPING PROJECT

54%

Around the world, about **740 million women still do not have bank accounts** — representing 54 percent of all unbanked adults, as of 2021.[1]

9-6%

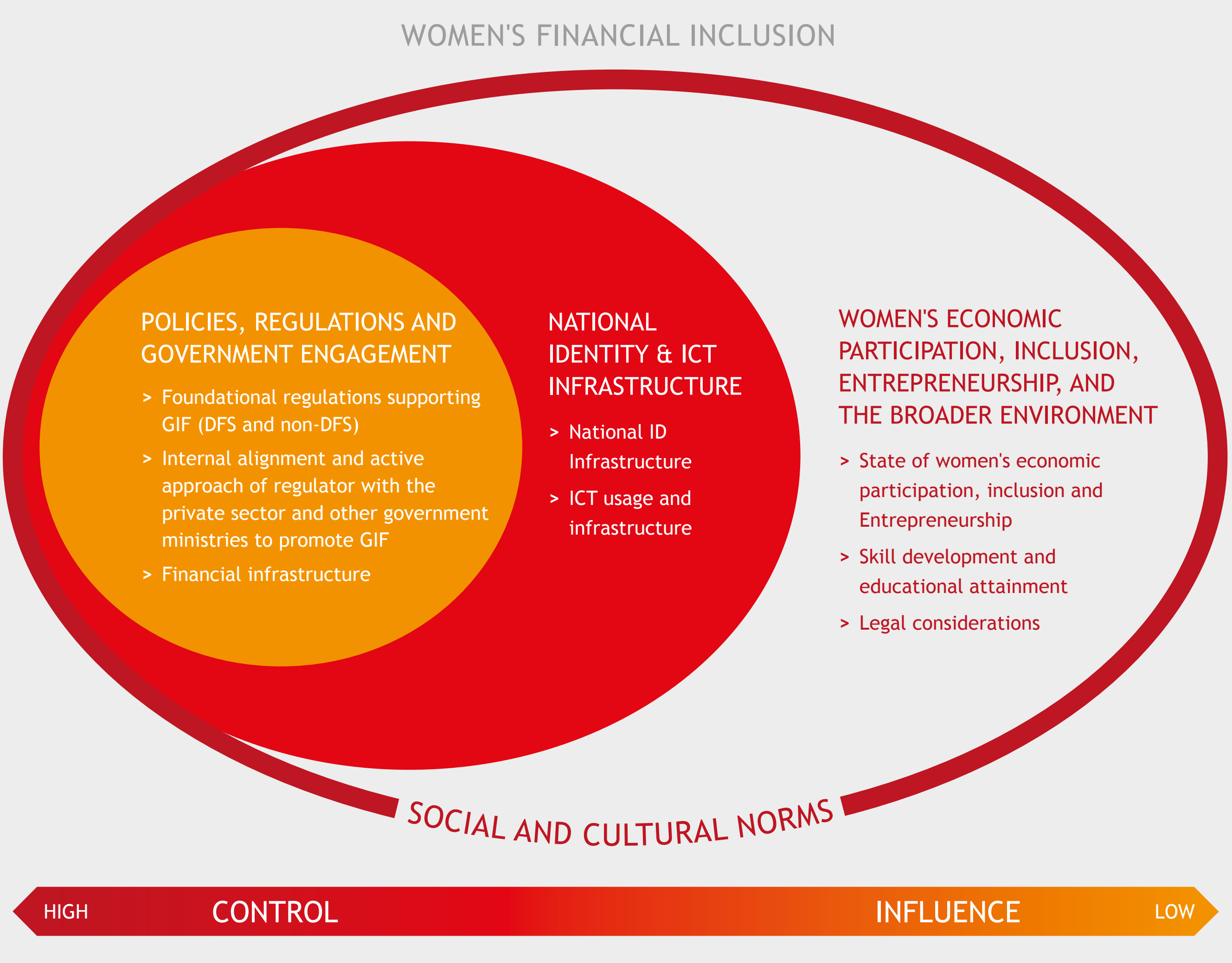
The efforts to narrow the finance-gender gap have been paying off since 2017, with a **gap reduction of nine percent to six percent in developing and emerging countries.**[2]

It is clear, however, that more must be done to address this persistent financial inclusion gender gap which is more than simply the right thing to do: It also makes good business sense, with estimates suggesting that advancing women's equality could add $12 trillion to global gross domestic product by 2025. Women-led small and medium enterprises (WSMEs) already make significant contributions to the economies in which they operate, accounting for a third of all SMEs, and a much higher percentage in many countries, and being a segment that has long been recognized as an important engine of growth and job creation but one that suffered from high levels of informality and significant gender gap in access to credit.

1 World Bank. 2021. Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19. Available at: https://www.worldbank.org/en/publication/globalfindex

2 Ibid.

FIGURE 1: GENDER INCLUSIVE FINANCE ANALYTICAL FRAMEWORK: INFLUENCERS OF INCLUSION WHERE REGULATORS CAN HAVE IMPACT ON WOMEN'S FINANCIAL INCLUSION



There is no single reason why women cannot access or use financial services. Rather, it is a complex blend of regulatory factors, suitable products and services, access to education and ID documents, suitable infrastructure available in places where women can use it and products and services that meet their needs, lastly social and cultural barriers play a significant part.

The Alliance for Financial Inclusion (AFI) Financial Inclusion Gender Gap Mapping project is designed to increase understanding about the barriers and enablers of women's financial inclusion, with the goal of helping financial sector regulators and policy makers identify highly specific and concrete actions that will drive greater inclusion in their countries.

The holistic research breaks new ground by identifying specific factors and areas over which financial regulators have direct influence: policies, regulations, and government engagement to advance GIF. But instead of looking at the financial regulators' landscape in isolation, the research also explores other spheres of influence within the broader context of women's economic participation and inclusion, providing nuanced insight into women's place in society and the economic fabric of their countries. Figure 1 illustrates this interplay, delineating the various factors that can contribute to increased women's financial inclusion. It highlights the specific role financial regulators can play in advancing progress, as well as the degree to which they can influence other critical factors. The graphic also portrays the overarching impact that social and cultural norms have on the entire GIF ecosystem—and women's equality in general.

Figure 1 shows that many factors fall outside the financial regulators' direct remit. However, they are essential for enabling women's financial inclusion environment—and advancing the regulatory women's financial inclusion agenda. For instance, just because there is a regulatory policy to encourage increased lending to women entrepreneurs, it does not mean there will be a significant uptick in a bank's women SME loan portfolio—unless other changes in financial infrastructure and bank approaches have occurred. The research findings are clear: without aligned and coordinated action across all the spheres of control and influence, progress toward gender parity in financial inclusion will only go so far.

In essence, the project is a call to action for financial regulators on two fronts: are they doing everything within their mandate and sphere of influence to advance progress on women's financial inclusion? And, after addressing all the factors in their sphere of influence, what else can they do outside their direct remit to support the broader women's financial inclusion ecosystem?

By providing financial sector policymakers and regulators with a deeper knowledge base about specific regulatory solutions that are having an impact—as well as pathways that will advance other drivers of inclusion—these critical stakeholders can enhance the effectiveness of their interventions and maximize their role in closing the financial inclusion gender gap in their countries. In turn, these efforts will contribute to the achievement of the United Nations Sustainable Development Goals (SDGs), specifically SDG 1 (No poverty), SDG 5 (Gender equality), and SDG 8 (Decent work and economic growth).

This case study offers an overview of the current state of women's financial inclusion in Uganda. It takes stock of the Bank of Uganda's progress in advancing women's financial inclusion. It delves into the specifics of the national financial regulatory environment, highlighting the key strategies and initiatives that have contributed to closing Uganda's gender gap in access to finance. It details factors influencing women's financial inclusion outside the regulator's remit.

Although the case studies are designed to be stand-alone documents, readers may also be interested in reviewing the Project's Landscape Study, which provides a full picture of women's financial inclusion and gender inclusive finance across the AFI network, as well as the summary report, which synthesizes key findings from the research.

EXECUTIVE SUMMARY

Uganda has made significant strides towards women's financial inclusion in the last ten years.

65%

The World Bank's Global Findex Database reveals that **65 percent of women and 67 percent of men owned a bank account in 2021.** This is a remarkable increase from only 15 percent of women owning a bank account in 2011.

The increase in women's account access is largely attributed to the rise of mobile money. Outside that realm, women still utilize informal financial services like village savings and loan associations and rotating savings and credit associations. Only 18 percent of women borrow from a formal lender.[3]

The expansion of digital financial services in Uganda can be partly attributed to the regulations put in place by the Bank of Uganda, which is the central bank and financial regulator. In 2013, the Bank of Uganda issued Mobile Money Guidelines; it has since updated those guidelines and implemented Agent Banking Regulation and the National Payments Act in 2017 and 2020, respectively. Interoperability, a tiered know-your-customer, and a data protection law have supported Uganda's growth of digital financial services.

In the future, the Bank of Uganda intends to play a more active role in promoting a gender inclusive financial system, which may lead to improved quality in women's financial inclusion beyond just mobile money. So far, efforts have been coordinated around the 2017-2022 National Financial Inclusion Strategy, which did not detail objectives and actions specific to women. National approaches to facilitating women's access to and use formal financial services are being considered. Nevertheless, the Bank of Uganda operates as the Secretariat of the National Financial Inclusion Strategy and leads the implementation of financial literacy efforts. It has also started to explore how to collect sex-disaggregated data from regulated financial institutions. This will help inform policy decisions and provide the financial institutions with the necessary data to assess the market size and business opportunity.

There is an opportunity for improved coordination and collaboration of the ecosystem players under the new National Financial Inclusion Strategy and an explicit focus on women's access and usage, with targets. Additionally, the digitization of government-to-person payments, promoting the private sector to implement solutions tailored to women, streamlining consumer protection efforts, and increasing gender diversity and inclusion in the banking sector will all help to create a more gender inclusive ecosystem.

3 World Bank Findex. 2021. The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19.

Young female from Karamojong tribe, eastern Uganda. (Ivan Faure/iStock)

STATUS OF WOMEN'S FINANCIAL INCLUSION IN UGANDA

Uganda is a landlocked country in eastern Africa. It is one of the least developed countries on the continent. The adult population skews females (54 percent, or about 10 million women).

Most Ugandans live in rural areas (75 percent of the total population).[4] Nevertheless, women's financial inclusion has been on the rise: from 2011 to 2021, Uganda had the second-largest increase in women's account ownership in Sub-Saharan Africa, a 330 percent increase.[5]

65%

As of 2021, **65 percent of Ugandan women were financially included,** compared to 67 percent of men.[6]

Figure 2 shows that Uganda has nearly closed the relative gender gap in account ownership from 42 percent in 2011 to just 3 percent in 2021.[7]

Mobile money has been the critical driver of Ugandan women's financial inclusion across the last decade and has led to an increase in formal financial inclusion. Mobile money in Uganda relies on the simplicity of unstructured supplementary service data rather than smartphones. In a developing country like Uganda, transacting on a feature phone increases accessibility, reduces costs, and does not require high literacy levels. Therefore, mobile money is an entry point for many Ugandan women to Telco and financial services.[8] Findex reports an 82 percent increase in women's mobile money account ownership from 2014 to 2021. As of 2021, 53 percent of women had a mobile money account, which is high compared to 65 percent of women with an account. Mobile money ownership and usage have increased since the COVID-19 pandemic, which has also increased the need for digital financial services (DFS). The Bank of Uganda (BoU) reports that registered customers grew from 27 million to 30 million, a 12 percent growth from 2019 to 2020 alone (Figure 3).[9]

The gender gap in mobile money account ownership is minimal (only two percentage points). Women use mobile money in similar ways to men. It is reported that there are no differences between men and women in average account balances, the number of accounts they interact with, or the number of withdrawals made. There is little difference in the number of active days per month, except amongst elderly rural women.[10]

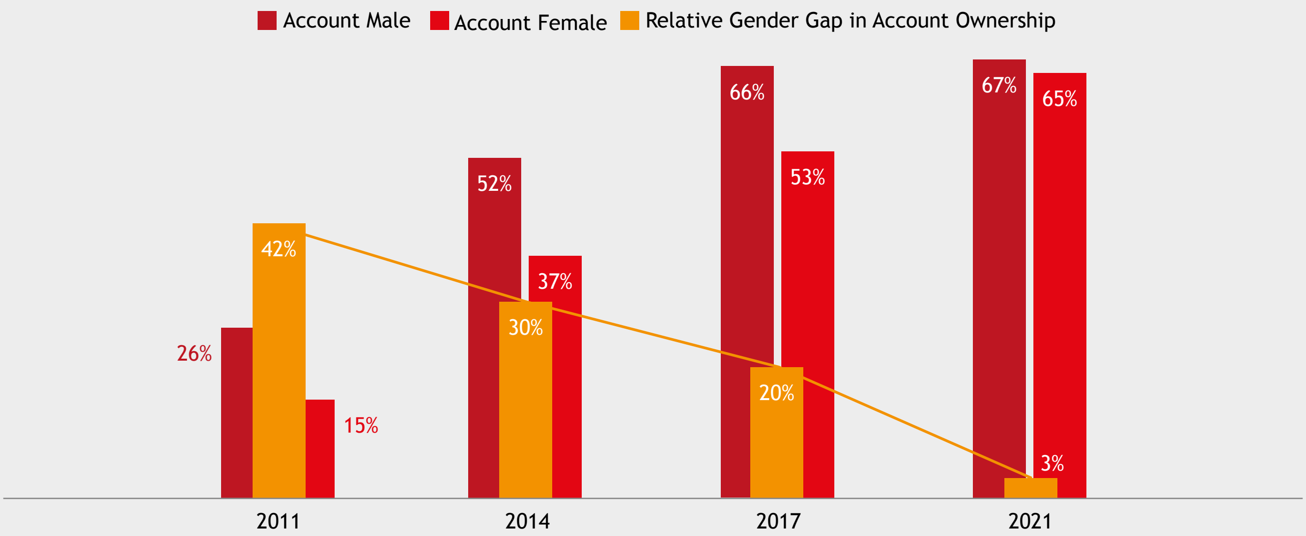
While the advent of mobile phone money services has led to increased access to formal financial services, women still lag in utilizing these. While 71 percent of adult women report saving money, only 14 percent save at a formal financial institution.[11] Similarly, 78 percent of women report borrowing, but only 18 percent borrow from a formal financial institution, whereas 57 percent borrow from family or friends.[12]

Indeed, the informal financial sector in Uganda, comprised of village savings and loan associations (VSLAs), rotating savings and credit associations (ROSCAs), and savings groups, remains strong and important to women's financial lives. Fifty-seven percent of Ugandan women and 54 percent of men use informal financial services. This percentage is skewed towards rural areas where 57 percent of adults are informally served compared to 51 percent of urban adults. It is optimistic that the reliance on informal financial services has dropped significantly in the past decade from 42 percent in 2009 to 20 percent in 2018. Yet in 2018, 34 percent of adult women only used informal services, with VSLAs being the predominant sector.[13]

Women prefer these informal financial methods because of their proximity to their homes, simplicity of use (even for those with low financial literacy), and inclusivity for individuals with low and variable incomes.[14] In many cases, this is because formal financial institutions are not present in rural areas, or their access points are in places that are too difficult or costly for women to access.

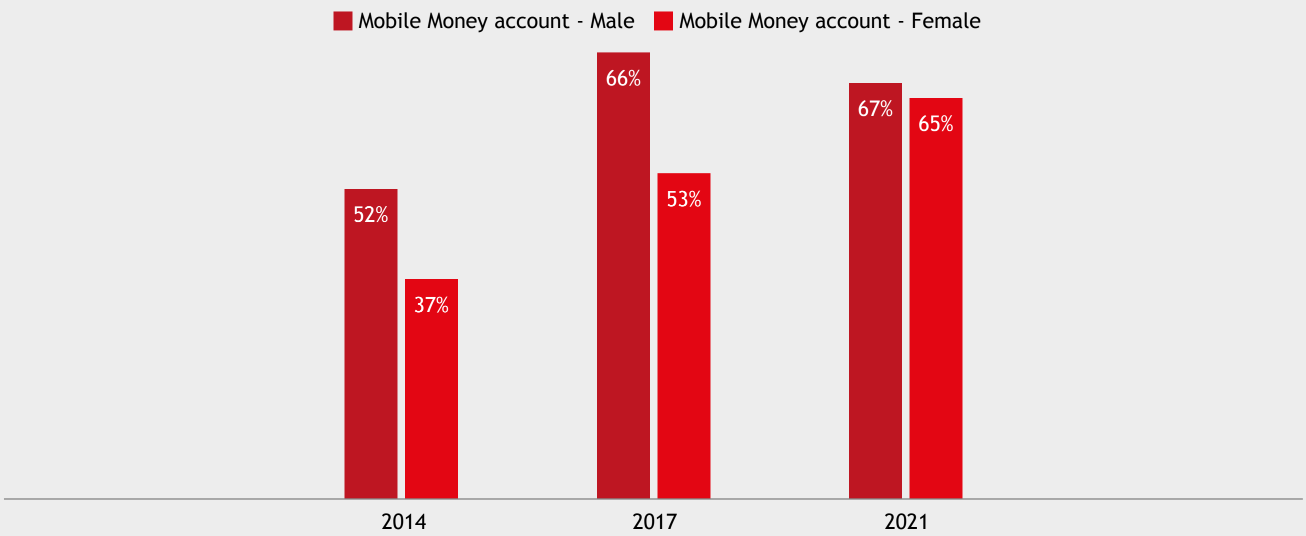
4 FSD Uganda-FinScope. 2018. Topline Findings Summary Report. World Bank. 2018. Rural population – Uganda.
5 Bill & Melinda Gates Foundation. 2019. A G7 Partnership for Women's Digital Financial Inclusion in Africa. World Bank Findex. 2021. The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19.
6 World Bank Findex. 2021. The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19.
7 Ibid.
8 FSD Uganda-FinScope. 2018. Topline Findings Summary Report.
9 Ebong, J. & George, B. 2021. Financial Inclusion through Digital Financial Services (DFS): A Study in Uganda. Journal of Risk and Financial Management.
10 Data Insights. 2019. Mobile Money & Gender in Uganda
11 World Bank Findex. 2021. The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19.
12 Ibid.
13 FSD Uganda. 2018. FinScope 2018: The case for a deeper and more inclusive financial sector in Uganda.
14 FSD Uganda. 2018. Report on Informal Financial Inclusion in Uganda 2018.

FIGURE 2: ACCOUNT OWNERSHIP (BY SEX)



Source: World Bank Findex. 2021. The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID

FIGURE 3: MOBILE ACCOUNT OWNERSHIP (BY SEX)



Source: World Bank Findex. 2021. The Global Findex Database 2021: Financial Inclusion, Digital Payments, and Resilience in the Age of COVID-19.

When it comes to loans specifically, lack of collateral is a big barrier for women to access loans from formal financial institutions. This is partly due to the former Ugandan Succession Laws, which up until recently, prohibited women from inheriting assets from their parents and deceased spouses.

The microfinance sector in Uganda is strong and dominated by women. Several microfinance banks (MFBs) and the main players, including Finance Trust Bank and BRAC Uganda, focus specifically on women individuals and women-owned businesses. There are about half a million active microfinance borrowers, including those with loans from commercial banks, MFBs, non-bank microfinance institutions (MFIs), and Savings and Credit Co-Operative Society (SACCOs).[15] Some MFBs, like BRAC, can disburse loans via mobile money. This means women loan recipients are less subjected to sharing pressure from their spouses, and the loan is more likely to be used to improve business/ household outcomes.[16]

15 MFTransparency. 2011. Transparent Pricing In Uganda.

16 Riley, E. 2021. Increasing female enterprise growth through mobile money: Experimental evidence from Uganda. VoxDev.

FINANCIAL INFRASTRUCTURE

Uganda's financial infrastructure has been shifting toward more digital avenues, with a steady decline in bank branches and increased banking agents. In 2014, there were 664 branches per 10,000 adults. By the end of 2021, there were 703, with only a slight increase year over year.

On the other hand, Uganda has grown its agent infrastructure from zero in 2014 to 22,800 by the end of 2021, with the support and clarification provided by the Agent Banking Regulation implemented in 2017.[17]

The recent expansion of the agent banking network helps reach rural Ugandans (75 percent of the population) without requiring individuals to travel far to transact financially.

30%

A significant share (30 percent) of banking agents in Uganda are women, which eliminates the potential cultural or comfortability barrier some women face when conversing with male agents.[18]

ICT INFRASTRUCTURE

Women in Uganda are likely to own a mobile phone (69 percent), which has enabled the growth of mobile money services. However, digital connectivity across the country is low, especially among women.

Women are 43 percent less likely than men to have internet access: only 13 percent of women have it, according to the GSMA.[19] Lack of know-how is a significant barrier to women's internet usage: 46 percent of women cite not knowing how to use the internet as the main barrier.[20] This limits the application and scale of DFS and its impact on GIF.

Furthermore, women's ownership of smartphones is scarce: only 13 percent of women who own a mobile phone own a smartphone, compared to 18 percent of men.[21] While this does not exclude women from conducting basic mobile money transactions, expansion of digital connectivity will be required to scale up the usage of more advanced digital financial products and services, as will financial and digital financial literacy programs to build women's skill levels and trust in DFS.

17 Bank of Uganda. FI Indicators Data.
18 UNCDF. 2019. Introducing Agency Banking in Uganda: A New Channel to Increase Financial Inclusion.
19 GSMA. 2020. Connected Women: The Mobile Gender Gap Report 2020.
20 IFC. 2018. Women and Digital Financial Services in Sub-Saharan Africa: Understanding the Challenges and Harnessing the Opportunities.
21 GSMA. 2020. Connected Women: The Mobile Gender Gap Report 2020.

Young female MSME selling SIM cards. (Juan Alberto Casado/iStock)

NATIONAL IDENTITY INFRASTRUCTURE

National identification is not a significant barrier to women's financial access in Uganda. According to ID4D by the World Bank, 80 percent of women and 82 percent of men in Uganda have a national ID, which is required to open a bank account and register a SIM card, which is needed for a mobile money account.[22]

Instead, the greatest barriers to GIF in Uganda are mobile access and digital connectivity, trust in financial institutions, and financial and digital literacy and knowledge, as covered in this report.[23]

Digital IDs can enable greater financial inclusion and improve transparency and efficiency in financial service delivery if utilized to open a digital account and if the program is coupled with widespread educational campaigns. Since 2014, the government of Uganda, led by the NIRA-U, has been aggressively promoting the adoption of digital IDs, known as Ndaga Muntu.

70%

To date, **25 million digital IDs have been issued** or about 70 percent of the country's eligible adult population.

Biometric verification is necessary to open a bank account, buy a SIM card, start formal employment, get a passport or a loan, or receive government benefits.[24] Critics point out that applying the digital ID requirement to public and private services is causing exclusion for many people, especially the poor and vulnerable, who lack the literacy or understanding required to enroll in the digital ID program. Many call for an end to the program until NIRA-U can fully deliver on its mandate and ensure universal access.[25]

22 World Bank. 2018. ID4D Data: Global Identification Challenge by the Numbers

23 FSD Uganda. 2018. FinScope 2018: The case for a deeper and more inclusive financial sector in Uganda.

24 Biometricupdate.com. 2022. Uganda's digital ID achievements, challenges and prospects

25 Association for Progressive Communication. 2022. Uganda's digital ID system: A cocktail of discrimination.

Family laughing while sitting between mud houses, rural Uganda. (Juan Alberto Casado/iStock)

THE ROLE OF GOVERNMENT AND FINANCIAL REGULATORS IN DRIVING GENDER INCLUSIVE FINANCE

Given their influence and supervision over the sector, developing a enabling national gender inclusive finance (GIF) ecosystem is a key priority.

It positions the financial regulator(s) at the heart national efforts to improve women's economic opportunities in Uganda and includes collaboration with other national stakeholders that are important to the landscape of GIF and access. Figure 4 shows the current and potential collaboration between the players in Uganda.

The BoU, the country's central bank, has played and will continue to play an important role in Uganda's GIF. The BoU is responsible for the formulation and implementation of monetary policy as well as regulating and supervising financial institutions, including commercial banks, credit institutions, and deposit-taking MFIs. It also oversees foreign exchange bureaus, money remitters, licensed payment providers, and payment system operators (PSOs).

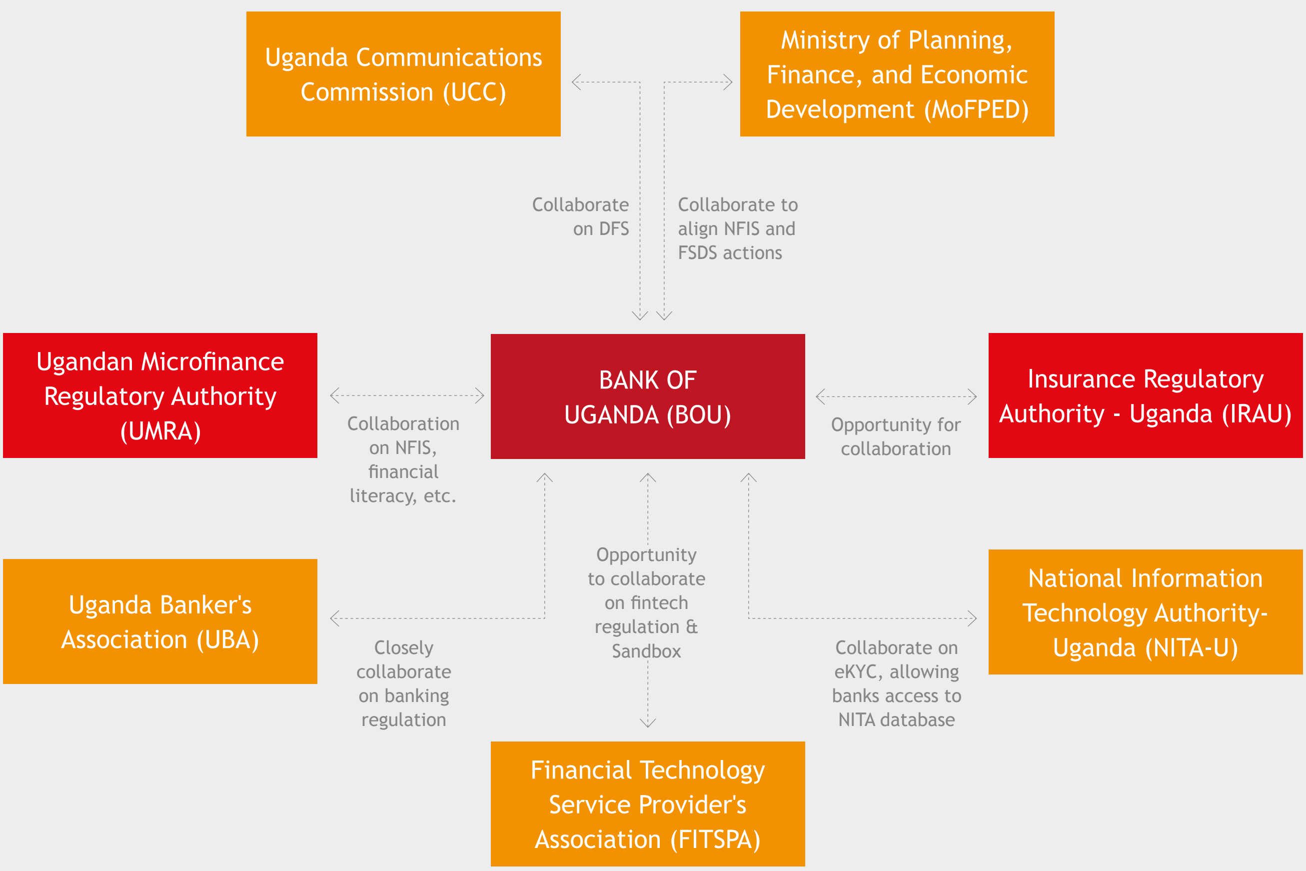
In 2017, the government of Uganda published the country's first National Financial Inclusion Strategy (NFIS), which was developed by the Ministry of Finance, Planning and Economic Development alongside the BoU and other public and private stakeholders.[26]

5%

The goal is to **reduce exclusion by five percent** by completing the strategy in 2022.

26 Bank of Uganda. 2021. NFIS Mid-Term Review.

FIGURE 4: UGANDA'S GIF ECOSYSTEM



Throughout the strategy, women are recognized as the main driver of financial inclusion, especially within financial education and literacy. However, the strategy does not include sex-disaggregated targets.

They were supposed to be determined once FinScope data became available in 2018. However, this was not done. The BoU is the Secretariat of the NFIS. This role coordinates the players' initiatives and actions under the NFIS.

To implement the NFIS and its objectives, the BoU, as the Secretariat, works closely with the Ugandan Bankers Association (UBA), an umbrella organization for licensed commercial banks supervised by the BoU. With 36 members in 2021, including all 25 commercial banks in Uganda, one of UBA's main objectives is working closely with the BoU and other non-bank financial institutions and organizations to promote financial sector growth and inclusion.[27]

The telecommunications regulator in Uganda is the Uganda Communications Commission (UCC). The BoU and UCC have signed a memorandum of understanding abound inter-regulatory cooperation on DFS. It is reviewed and amended to account for new industry developments and needs, such as collaboration on cross-cutting issues like digital financial literacy.

The Ugandan Microfinance Regulatory Authority (UMRA) was created by the Microfinance Act of 2016 to supervise non-deposit-taking MFIs and SACCOs that predominantly serve women customers. Currently, UMRA also regulates VSLAs, savings groups, and cooperatives. Deposit-taking MFBs, many of which focus specifically on women (Finance Trust Bank, BRAC Uganda), is regulated by the BoU. The UMRA actively participates in the NFIS Working Groups and industry events and works closely with the BoU on various gender initiatives, including financial literacy.

The Insurance Regulatory Authority in Uganda is responsible for the administration, supervision, and regulation of insurance companies in Uganda. In 2019, the government drafted a National Insurance Policy Framework to ensure Ugandans' access to affordable and appropriate insurance products and services.[28] Yet few Ugandans are still covered by insurance and even fewer women. The Insurance Regulatory Authority in Uganda can work with the BOU better to speed up the implementation of the framework and enable the use of bank agents as a low-cost delivery channel for the distribution of insurance services.[29]

To design FinTech regulation, the BoU collaborates with the Financial Technology Service Providers Association (FITSPA), a membership-based organization founded in 2017 that works to increase access to affordable financial services through ICT and promote financial inclusion. FITSPA currently has over 160 members, most of whom are FinTechs that actively serve customers in Uganda. While the market has largely yet to intentionally focus on women, the BoU is hopeful for the future of FinTech innovation in Uganda and is implementing initiatives like its regulatory sandbox to handhold smaller players.

The National Information Technology Authority (NITA-U) is Uganda's designated national data protection authority, which maintains the register that lists every institution, person, or public body collecting or processing personal data. Personal data protection is critical for enabling women to trust financial institutions and protecting them from cybercrime, which disproportionately affects them. In 2019, NITA-U established the Data Protection and Privacy Act and worked with the UBA and BoU on the compliance of commercial banks and FITSPA to ensure FinTech compliance.

27 Uganda Banker's Association. 2021. Annual Report 2021
28 Bank of Uganda. 2021. NFIS Mid-Term Review.
29 Ibid.

FOUNDATIONAL REGULATIONS THAT ENABLE GENDER INCLUSIVE FINANCE

In recent years, the government of Uganda has implemented several regulations that set the foundation for GIF through digital and non-digital channels.

Table 1 shows that the framework's foundational regulation is either already in place (green icon) or development (orange icon).

TABLE 1: FOUNDATIONAL DFS AND NON-DFS REGULATIONS THAT ENABLE GIF IN UGANDA

DFS	
Mobile money regulation	●
Interoperability and national switch	●
Tiered KYC	●
Agent banking use and regulation	●
Open banking	●
Data privacy and use framework	●
NON-DFS	
NFIS with a gender focus	●
MSME Masterplan/Development Act	●
Gender inclusive consumer protection	●
Microfinance regulation	●
Alternative or movable collateral registry	●
Central credit bureau use and regulation	●
Regulation on cooperatives/VSLAs	●

DIGITAL FINANCIAL SERVICES REGULATION

Mobile money has been instrumental in increasing women's financial access in the past years. The recent expansion of mobile money offerings and usage has been supported by several policies and regulations put in place by the BoU. Starting in 2009, the BoU allowed provisional e-money licenses, which facilitated the birth of MTN and Airtel.

In 2013, the BoU issued Mobile Money Guidelines, under which consumers could present various documents to open a mobile account (including a driver's permit, voter card, or local administration letter), not only national IDs. The guidelines were updated in 2020 with the National Payment Systems (NPS) Act. The NPS Act identifies broadening access to payment systems as a key goal and establishes the BoU as the mobile money industry's regulator. Soon after, the BoU issued PSO licenses to Airtel Mobile Commerce and MTN Mobile Commerce. Today, these are the largest and most widely used in Uganda.[30] As of 2021, the UCC estimated that MTN had 15 million customers (representing 53 percent of the market share) and Airtel had 10 million customers.

Under the NPS Act, PSOs are permitted to establish their separate corporate entity that stores the value of wallets, rather than needing to do so with a licensed bank, which is onerous and would require more robust know-your-customer (KYC) requirements. The BoU has been working on Implementing Regulations of the NPS Act 2020. The midterm review of its NFIS recommends that the BoU intensify follow-up with relevant stakeholders to fast-track the finalization.[31]

Women generally lack free time and social mobility. In a country where 75 percent of the population is rural, proximity to bank branches has been a barrier to formal financial access.

30 Ebong, J. & George, B. 2021. Financial Inclusion through Digital Financial Services (DFS): A Study in Uganda. Journal of Risk and Financial Management.

31 Bank of Uganda. 2021. NFIS Mid-Term Review.

32 UNCDF. 2019. Introducing Agency Banking In Uganda: A New Channel to Increase Financial Inclusion.

For customers, agency banking can allow for reduced travel time, greater access, and increased convenience of formal financial services.[32] Agency banking in Uganda took off in 2017 when the government amended the Financial Institutions Act of 2004 to incorporate agent banking regulation that enables Ugandan banks to use agency banking to expand their presence, particularly in rural areas. So far, agent banking has been embraced by 18 of the country's 25 commercial banks.[33] Agents must be selected by a regulated process, comply with consumer protection regulations, and disclose their transactions to the bank and, by proxy, to the regulator. This regulation led to a three-fold increase in Uganda's agent banking network from 2012 to 2019. It enabled a shift from using branches and ATMs to agents due to their proximity/convenience.[34]

Interoperability promotes competition, increases the financial viability of service offerings, and improves the utility of payment instruments and convenience for the end user – all of which can make it easier for women to utilize digital and non-DFS. Uganda has implemented retail payments and agent channels interoperability, but there is no national switch yet. Many local vendors and retailers accept Airtel Money and MTN Mobile Money (with transaction fees). There is interoperability between the two e-wallets as of 2016. While there has been progress on enabling interoperability between mobile money service providers on a bilateral basis and limited interoperability between bank accounts and mobile money accounts, the BoU could aim to fast-track implementation of full interoperability among banks and non-banks to reduce the cost of services and improve the utility and convenience of service delivery.[35,36]

Tiered KYC requirements enable greater access to accounts by allowing for lesser requirements for basic accounts, like mobile money accounts. This can be especially important to increase women's access, as robust account-opening requirements can confuse and deter them. In addition, some still lack a national ID. The Anti-Money Laundering Act and Regulations from 2015 require individuals to produce a national ID card, alien/refugee ID card, or passport to open a bank account. Still, these requirements do not apply to mobile money accounts.[37] Mobile money accounts can be opened with various documents, including a letter from the local administration. A user can register a SIM without visiting a physical office, which opens access to women who are time-constrained and those who live in remote rural areas.[38] Implementing tiered KYC is an objective of the NFIS, but banks and non-bank financial service providers (FSP) have faced challenges in developing a risk-based KYC approach. A 2020 amendment to the 2015 Anti-Money Laundering Regulations has been finalized; it is undergoing review by the Parliamentary Council. The goal is to allow fewer KYC requirements for certain (more basic) accounts while balancing the need to control customer risk and combat money laundering and financial terrorism.[39]

In general, women in Uganda are more risk aware and can be less trustworthy of FSPs. With an ecosystem that collects, analyzes, and uses sex-disaggregated data, there need to be safety nets and a robust data protection framework in place so that women establish trust in the financial system and are willing to give up and share their financial data. Amid the growing uptake of DFS, the government of Uganda is taking measures to ensure that customer financial data is protected. In 2019, the NITA-U issued the Data Protection and Privacy Act, which covers the regulated banking sector. In 2021, the National Personal Data Protection Director was appointed, a requirement under the NPS Act.

The NPS Act also legalizes open banking, which is increasingly important in emerging markets like Uganda, where mobile service providers are the main enablers of the digital economy. Open application programming interfaces have become a powerful way to foster innovation for a financially inclusive economy. In 2019, MTN became the first giant telco in Uganda to open its mobile money application programming interface to third-party software developers, allowing for a seamless flow of information so that new features or apps can be built off another interface or application.[40] Airtel Money is following suit. By enabling data sharing, open banking can allow financial institutions to create a broader range of products tailored to their customers, reduce costs and empower women to take greater control of their finances.

33 Bank of Uganda. 2021. NFIS Mid-Term Review.

34 Ebong, J. & George, B. 2021. Financial Inclusion through Digital Financial Services (DFS): A Study in Uganda. Journal of Risk and Financial Management. Bank of Uganda FI indicators data.

35 Bank of Uganda. 2021. NFIS Mid-Term Review.

36 Ibid.

37 UNCDF. 2017. Study on Know-Your-Customer Requirements for Digital Financial Services in Uganda.

38 Ibid.

39 Bank of Uganda. 2021. NFIS Mid-Term Review.

40 L'akwang, O.N. 2019. Will other FinTechs follow as MTN Uganda opens future of APIs? Medium.

TRADITIONAL BANKING REGULATION

A gender inclusive consumer protection regulation is essential to an inclusive financial system as it can help build customer trust and confidence, improving uptake and usage.

In Uganda, where women especially lack trust in financial institutions, and their financial know-how is lower, consumer protection guidelines that address issues that concern women clients are critical to enabling women's inclusion. In 2011, the BoU passed the Financial Consumer Protection Guidelines that apply to deposit-taking banks. The Guidelines establish rules around over-indebtedness and consumer transparency and address financial literacy.[41] A corresponding set of rules was passed for non-bank MFIs and mobile money operators, which also identified challenges particularly related to women's inclusion.[42] In 2019, the government established an ombudsman that has the power to resolve disputes for smaller loans.

The BoU launched a Financial Consumer Empowerment Mechanism Unit to specifically handle complaints from customers of BoU-regulated financial institutions.[43] BoU has also conducted several financial consumer protection workshops across the country for the staff of its regulated financial institutions.[44] There is still work to be done to increase awareness of consumer protection mechanisms: 21 percent of respondents to the BoU 2020 Financial Capabilities Survey revealed that they did not know the mechanism for resolving their complaints about FSPs.[45] There is also an opportunity for the regulators to coordinate with one another rather than working in isolation, as is the current practice. This would allow them to establish a comprehensive and gender sensitive financial consumer protection framework and ensure the standards are harmonized across the entire sector.[46]

41 Bank of Uganda. 2011. Bank of Uganda Financial Consumer Protection Guidelines, 2011.
42 Ibid.
43 Bank of Uganda. 2021. NFIS Mid-Term Review.
44 Ibid.
45 AFI and Bank of Uganda. 2020. Financial Capabilities Survey.
46 Bank of Uganda. 2021. NFIS Mid-Term Review.

Female market stallholders. (FrankvandenBergh/iStock)

As mentioned, UMRA is the regulator of non-deposit-taking MFIs and SACCOs, which serve mostly women customers. MFIs are subject to disclosure and consumer protection rules. If they apply and are granted a deposit-taking license, they will be regulated by the BoU. Several women-specific MFBs, including Finance Trust Bank, have products and services designed specifically for women's financial needs. For example, Finance Trust Bank has a "women's business loan" tailored to women engaged in micro and small businesses who wish to borrow to increase their working capital, with loan periods of up to five years and manageable installments.[47] The Microfinance Deposit Taking Institution Act recently permitted MFBs to use agent banking networks, facilitating easier access for women in rural areas.[48]

To enable access to banking for Ugandan Muslims, estimated at 14 percent of the total population, the BoU issued Financial Institutions (Islamic Banking) Regulations in 2018. The regulations detail guidelines around the technical aspects related to Islamic financial products.[49] The Financial Institutions Act was also amended to allow supervised financial institutions to establish fully-fledged Islamic banks or conventional banks to establish special windows to provide Islamic financial services.[50] These regulations are important for opening up access and financial inclusion for Muslims, many of whom will not use non-Islamic financial services due to religious beliefs.

Women SMEs are a priority segment within the government's financial inclusion agenda. In 2015, the Ministry of Trade, Industry and Cooperatives published a grand strategy on micro, small and medium enterprise (MSME) policy, which details women entrepreneurs and business owners as a crucial segment of the plan.[51]

The SME division of the Ugandan Investment Authority implements the plan. In addition, in 2016, the government launched the Ugandan Women Entrepreneurship Program to address the challenges women face in undertaking economically viable businesses. It includes limited access to affordable credit, limited technical knowledge and skills for business development, and limited access to markets and information regarding business opportunities.[52] Part of the program is the Women Enterprise Fund, which provides groups of ten to 15 women with business training and interest-free credit for enterprise development on a revolving basis.[53]

In 2005, the government of Uganda established credit reference regulations, which regulate the BoU's credit reference bureau and the two privately-owned credit bureaus, Compuscan and Metropol. The credit bureaus still do not include alternative transaction data, such as cell phone usage and utility payments. Adding this data would allow for a more robust and accurate assessment of women's financial lives, enable women to build credit histories, address the issue of women's lack of traditional collateral, and enable financial institutions to offer terms that reflect the actual (lower) risk of women having access to credit instead of the perceived risk.

In 2019, the Parliament Act enabled the creation of Uganda's electronic movable collateral registry, the SIMPRIS. SIMPRIS enables creditors, including commercial banks, MFIs, savings and credit organizations, leasing companies, and other financial institutions, to access the online portal where an individual's movable property is registered.[54] The SIMPRIS is an enabler of women's access to finance, as many women in Uganda do not have land or property titles. Still, some possess movable assets that can and should serve as collateral. The full impact of this new regulation is yet to be seen, but if implemented well, an electronic movable collateral registry can be highly effective.

47 Finance Trust Bank. Women's Business Loan.

48 Bank of Uganda. 2021. NFIS Mid-Term Review.

49 Ibid.

50 Ibid.

51 Ministry of Trade, Industry and Cooperatives. 2015. Uganda Micro, Small and Medium Enterprise (Msme) Policy.

52 Ministry of Gender, Labour, and Social Development. 2019. Uganda Women Entrepreneurship Programme (UWEP). Programme Document.

53 Ibid.

54 Uganda Registration Services Bureau. 2019. About the Security Interest in Movable Property Registry System.

INTERNAL ALIGNMENT AND ACTIVE PROMOTION OF A VIBRANT ECOSYSTEM FOR GENDER INCLUSIVE FINANCE

Beyond policy measures, regulators must leverage their positioning in the financial services ecosystem to promote changes that drive GIF.

This requires aligning and coordinating GIF strategy and efforts, implementing programs to boost women's financial literacy, mandating sex-disaggregated data collection from financial institutions and reporting on progress, incentivizing financial institutions to implement women-centric solutions, actively engaging the market around GIF, and incentivizing FinTech and digital innovation. Table 2 shows that Uganda's financial sector has made greater strides on several of these initiatives. The areas marked red are the exception: actively encouraging and supporting FSPs to serve women better, implementing investment-friendly policies and vehicles, and promoting gender diversity and inclusion within the banking sector.

Alignment and coordination of public and private stakeholders on regulations and initiatives designed to support GIF is an imperative. Uganda's NFIS set forth several implementation and coordination structures, with the BoU at its heart. The BoU is the Secretariat of the NFIS and plays a role on the NFIS Steering Committee and Inter-Institutional Committee on Financial Inclusion. There are five working groups: Reduce Exclusion and Access Barriers to Financial Services; Mobile Financial Services; Credit Infrastructure; Deepen and Broaden Usage of Formal Savings, Investment, and Insurance Services; and Empower and Protect Individuals.[55]

Gender is mainstreamed throughout the Working Groups and implementing structures; the agenda is driven by participating organizations that focus on gender activities.

UMRA participates in the NFIS working groups, industry events, and four working groups that the BoU and others launch. The UMRA was also involved in formulating and rolling out the National Financial Literacy Strategy

TABLE 2: KEY REGULATORY INITIATIVES TO DRIVE GIF IN UGANDA

Internal commitment and alignment around the importance of GIF	●
Collaboration with the private sector to promote awareness/action on GIF	●
Drive the collection, reporting, and use of sex-disaggregated supply- and demand-side gender data for effective policy and managerial decisions	●
Promote women's digital skills and financial literacy	●
Promote the digitization of G2P payments to reach women	●
Encourage private sector involvement to promote the use of technology and women-centric solutions	●
Advancement of investment-friendly GIF-focused policies	●
Encourage/incentivize FSPs to better serve women (tailored financial and non-financial solutions)	●
Strategic commitment and programmatic actions to boost internal gender diversity and equity	●

and participating in awareness events and training. The BoU's Midterm Review of the NFIS details how the stakeholders can more effectively collaborate to ensure compliance with regulation and hold the players accountable for financial inclusion goals.

As the regulator of a great share of the financial system, the BoU has a unique opportunity to play a more active role in collecting, aggregating, and reporting supply-side sex-disaggregated data rather than relying on the demand-side Findex and FinScope surveys. Sex-disaggregated supply- and demand-side data is essential for policymakers to formulate gender-sensitive and inclusive policies and for FSPs to assess the market and develop products and services better suited to various segments of customers. Gender data is included as a goal of Uganda's NFIS. However, the BoU has yet to implement measures. The BoU is exploring the implementation of a web-based data portal through which BoU-regulated institutions would upload data which the BoU would then aggregate and make available to the public.[56] The BoU is also looking into the collection of data from SACCOs, MFIs, and VSLAs, which would enable a more robust assessment of GIF.[57] In the meantime, the sector, including the BoU, has been utilizing the FinScope national survey

55 Bank of Uganda. 2021. NFIS Mid-Term Review.
56 Ibid.
57 Ibid.

commissioned by FSD Uganda in conjunction with the BoU and performed every five years. While these surveys are extensive, they are time-consuming and expensive to conduct, so the data used is frequently outdated.

12%

Women in Uganda tend to be less literate (12 percentage point gender gap) and educated (8 percentage point gender gap in secondary education attainment). This serves as a key barrier to women's financial inclusion.

The NFIS has financial literacy and education as one of its five pillars.[58] There is also a lack of awareness among women about the services formal financial institutions provide and what is accessible to them. When Ugandan women who borrowed informally were asked why they didn't use a financial institution, 35 percent indicated that they did not know enough about it, which is ten percentage points higher than men.[59] This speaks to the need for financial education and information campaigns that include financing options as a fundamental way to drive up the levels of financial inclusion for women.

In 2019, the BoU launched a five-year National Financial Literacy Strategy focusing on women and girls.[60] The strategy details implementing financial literacy curriculums in schools, including messaging in media, church, and the workplace. As part of the strategy, a public-facing website was launched that includes resources for community groups interested in running literacy programming. The government's assessment of the first year of the strategy reveals that 2,000 individuals in over 75 districts participated in the financial literacy training of the trainer's program as of April 2022. This is remarkable, given the two-year freeze the pandemic placed on the program.[61] The Uganda Insurer's Association is also active in promoting education, specifically around the value of insurance solutions: between 2017 and 2020, it conducted over 120 awareness campaigns.[62]

The government-to-person (G2P) payments represent a great opportunity to include individuals in the financial system and promote digital transactions. Many governments around the world have moved to digitize government service programs. Individuals receive their payments in a basic account where they can leave or withdraw the funds as they wish. The government of Uganda had intentions to digitize the SAGE welfare program, which provided direct income support to senior citizens and vulnerable families, the latter of which was especially important to women. In the early 2010s, the program was delivered by MTN Money, but scandals about delayed payments caused the government to switch the payment method to the Postbank. As of 2015, the vulnerable family grant has no longer been provided due to poor acceptance and contention in the community.[63] In recent years, the government, led by the Ministry of Gender, Labor and Social Development, commissioned a feasibility study

58 FSD Uganda. 2018. FinScope 2018: The case for a deeper and more inclusive financial sector in Uganda.
59 IFC. 2018. Women and Digital Financial Services In Sub-Saharan Africa: Understanding the Challenges and Harnessing the Opportunities.
60 Bank of Uganda. 2019. Strategy for Financial Literacy in Uganda 2019-2024.
61 Bank of Uganda. 2021. NFIS Mid-Term Review.
62 Ibid.
63 Akullo, N.W. 2017. Social Assistance Grants for Empowerment (SAGE) Programme in Uganda. SocialProtection.org.

Ugandan sisters in school uniform standing outside their home with their mother. (Claudiad/iStock) into G2P payments for social grant programs. Still, it is being determined which payment method it plans to utilize (whether mobile money, a bank account, or cash). During the COVID-19 pandemic, the government also launched a short-term conditional cash transfer program for COVID-19 relief to urban persons. Forty-eight percent of the beneficiaries were female.

The BoU is beginning to demonstrate an active role in promoting financial technology innovation, although it remains unknown whether the industry's providers will target women and drive inclusion. While the larger mobile network operators will likely continue to lead the payments industry, smaller FinTechs can take advantage of their ability to provide value-added services on top of the existing supply chain. The BoU's 2020 Regulations for Payment Service Providers led to the issuance of payment service provider licenses to 14 FinTech entities. The BoU has demonstrated its willingness to handhold the smaller players through the newly implemented Regulatory Sandbox and the provision of conditional licenses as the FinTechs mature. The Regulatory Sandbox was implemented in March 2021. It has a minimal application fee to allow for the broad latitude of experience, which hopefully will lead to the creation of viable solutions that promote electronic payments, DFS, and overall financial inclusion. New FinTechs face the opportunity to incorporate the requirements of the various women's market segments in their product/service design and collect sex-disaggregated data from the start.

Another way the BoU can use its influential power is by incentivizing or encouraging financial institutions to implement women-centric financial and non-financial solutions for women SMEs and individuals. The BoU intended to utilize its role in the implementation of the NFIS to promote the supply-side change needed to include women, but it has yet to take concrete action. However, the private sector has advanced on its own. Several MFBs, commercial banks, and development banks explicitly target women with tailored solutions. For example, Stanbic Bank recently launched a suite of financial and non-financial offerings tailored to the common profiles of women in business and aimed at addressing bottlenecks women business owners face in accessing finance and banking.[64] Another Ugandan commercial bank, DFCU, set up a Women in Business program in 2007 that also provided preferential borrowing rates, mentoring programs, business training, and networking opportunities to 6,500 businesswomen to date.[65] As mentioned, many MFBs target women with favorable loan and savings solutions and microinsurance.

THE BANK OF UGANDA'S RESPONSE TO THE COVID-19 PANDEMIC

The COVID-19 pandemic has disproportionately impacted women in Uganda. A study reveals that women have an 11 percent greater likelihood of experiencing negative effects due to COVID-19, including the need to increase time dedicated to unpaid care work and taking longer to resume business operations.[66] As a result, 66 percent of female-led businesses reported failing to have income during the pandemic, compared to 22 percent of male-led businesses.[67]

At the same time, women and men have needed to rely on digital transactions rather than cash. This has led to an increase in DFS. Overall, internet banking transaction values grew by 30 percent, and mobile banking transaction values grew by 135 percent in the first year of the pandemic.[68] E-commerce is the biggest beneficiary of the pandemic across the FinTech industry. Despite requiring internet usage, which is highest in urban areas where smartphone concentration is also highest, e-commerce services have drastically increased in the past several years.

Part of this shift to digital was supported by the BoU's immediate actions at the onset of the pandemic. The BoU mandated the reduction of fees on mobile money transactions and other digital payment charges to limit the use of cash and bank branch visits and called for an increase in the daily transaction and wallet size limit for mobile money transactions.[69] The BoU also worked with its financial institutions to ensure that they continued to operate effectively, including providing exceptional liquidity assistance.[70] The MSME sector, which employs the majority of poor people and a significant share of women, was a specific focus of the BoU's COVID-19 assistance. It moved to ease liquidity constraints by providing tax relief and MSMEs with affordable credit options.

In June 2021, the government launched a short-term unconditional cash transfer program for COVID-19 relief to urban persons, with women accounting for 48 percent of the beneficiaries. The program's half a million beneficiaries received payments totaling USD14.14 million, which was instrumental to their financial viability throughout the ongoing pandemic.

64 PML Daily. 2022. Stanbic Bank, IFC partner to support women led enterprises in Uganda.

65 SME Finance Forum. 2013. Banking on Women in Business - Case Study: Uganda. British International Investment. Empowering women entrepreneurs.

66 EIB/CCX Research.

67 Ibid.

68 EIB/CCX Research

69 Bank of Uganda. 2020. Measures to mitigate the economic impact of COVID-19.

70 Ibid.

WOMEN'S ECONOMIC PARTICIPATION, INCLUSION, ENTREPRENEURSHIP, AND THE BROADER ENVIRONMENT

Thus far, it has been shown that the Ugandan financial regulator has played an active role in implementing policies and initiatives that benefit women's financial access and inclusion and that there is a moderate level of coordination between implementing parties.

However, to fully comprehend the nuances around women's financial access and usage and the lack thereof, one must understand women's role in the economy and society. Overall, women in Uganda are relatively economically empowered, especially as entrepreneurs and micro and small business owners. However, their educational attainment is relatively low, and women's businesses are often informal and small-scale. While these areas are not within the direct remit of the financial regulator, it can act as a convener and have great influence over other national bodies to encourage change.

71%

Literacy among Ugandan women is high compared to the average in the low-income AFI countries: 71 percent of Ugandan women can read/write compared to the peer average of 51 percent.[71]

TABLE 3: WOMEN'S ECONOMIC PARTICIPATION, INCLUSION, ENTREPRENEURSHIP, AND THE BROADER ENVIRONMENT IN UGANDA

Economic participation, inclusion, and entrepreneurship	● (red)
Skill development and educational attainment	● (orange)
Legal framework	● (orange)

71 UNESCO. 2020.

Female business woman using digital technology. (Wirestock Creators/Shutterstock)

However, in Uganda, where education levels are generally low, high school fees and related costs of public and private schools are barriers to children's education (uniforms, books, etc.).[72]

6%

Only 6 percent of women above 25 have completed secondary education or higher, compared to the AFI low-income country average of 13 percent.

The gender gap in secondary education entertainment is eight percentage points.[73] The impact of low education on women is lifelong: it limits her expected earnings and curtails her voice and agency in the household, at work, and in formal financial and non-financial institutions.[74] Increased government spending on education could support schools, so that related costs are not passed on to families, and fewer parents are faced with the need to pull their girl(s) from school due to the lack of money. Uganda's financial regulators can advocate for better education for girls and focus social responsibility efforts to mobilize attention and change.

Even with elementary education, many women in Uganda turn to entrepreneurship to make money for their families. Even though their businesses tend to be small-scale, informal, and in business sectors where profits are low, and opportunities to scale are more challenging. According to the 2021 Mastercard Index of Women Entrepreneurs, Uganda is one of the world's top three countries with the most women business owners as a percentage of total business owners. Also, it is one of only seven countries worldwide that has achieved gender parity in terms of the number of women driven to pursue entrepreneurial activities.[75]

Women tend to run micro and small enterprises that are often informal. Women-owned businesses account for approximately 40 percent of all informal and formal businesses. However, only 15 percent of formal SMEs are owned by women. This means that, as informal business owners, women are less likely to have proper bookkeeping and accounts and miss out on access to formal credit.[76] Women-owned micro and small enterprises mostly operate in the less lucrative trade and manufacturing (60 percent of all women-owned enterprises) sector, including textiles, food service, and hairdressing.[77] Women generally have less free time. This is partly due to their responsibilities for the child and elder care. If they are working in sectors that allow them to earn less than men, then they are doubly constrained in their ability to generate income.

There is an opportunity for stakeholders to provide technical training and apprenticeship to women entrepreneurs to support their ability to operate in traditionally male-dominated sectors like wood manufacturing and repair, electric and gas supply, leather manufacturing and repair, fitting and machinery, metal works, engineering, and foundries.[78] Women could increase their monthly profits by 141 percent by transitioning to these sectors, which currently only have 6 percent of women.[79]

Laws in Uganda do not hold women back significantly. However, several areas technically disadvantage women and should be changed to level the legal playing field for women. Ugandan women can legally travel outside their country and house the same way men can. They can also apply for a passport without a man's signature. However, Muslim women are likely further restricted by religious and social norms in their communities, where about 14 percent of the total population lives. Laws around women's work after having a baby should be improved (there is no paid maternity or paternity leave). However, these laws apply only to formal employment and companies of a certain size, which is not a large sector in Uganda.[80]

Important to women's access to credit are laws around discrimination in access to credit and inheritance laws. In Uganda, there is no law prohibiting discrimination in access to credit based on gender. This is an area where the BoU should certainly influence change.[81] And only recently did the government amend the Succession Act so that women can inherit assets from their parents or surviving spouses. This is important to women's ability to accumulate wealth and collateral that make them eligible for loans.[82]

72 National Post. 2022. Ugandan children drop out of school as fees soar post-COVID.
73 World Bank. 2020.
74 Global Partnership for Education & CIFF & World Bank. 2018. THE COST OF NOT EDUCATING GIRLS. MISSED OPPORTUNITIES: THE HIGH COST OF NOT EDUCATING GIRLS.
75 African Business. 2022. Unlocking SME potential through the power of emerging technology. World Bank Blogs. 2021. Unlocking the potential of women entrepreneurs in Uganda.
76 EIB/CCX Research.
77 World Bank. 2021. Unlocking the Potential of Women Entrepreneurs in Uganda.
78 Ibid.
79 Ibid.
80 World Bank. 2021. Women Business and the Law 2021.
81 Ibid.
82 Parliament of the Republic of Uganda. 2022. What new amendments to the Succession Act mean.

FUTURE OUTLOOK

With the 2017 NFIS concluding in 2022, the BoU is beginning to determine its priority areas and actions around GIF and women's financial inclusion. The BoU spearheads a key stakeholder assessment to ascertain feedback on the old strategy and gather intel to inform the new strategy. The ecosystem would benefit from a new NFIS that has an explicit gender angle throughout and includes targets around measures of women's financial inclusion beyond account ownership.

There is also a need for better alignment, coordination, and accountability between the financial ecosystem players, with the BoU at the center, as the Secretariat of the NFIS. The BoU should coordinate the development of non-overlapping and comprehensive terms of reference for each NFIS governance structure and memoranda of understanding between coordinating stakeholders. The BoU should also draw up an annual communication plan that indicates the schedule of meetings for the working groups, the inter-institutional committee on financial inclusion, the steering committee, and the financial inclusion forum. As more in-person meetings and workshops occur, the BoU must follow up with relevant working groups and implementing agencies for progress reports.[83] Each working group and the BoU would benefit from appointing a gender focal point responsible for coordinating activities across the sector and ensuring a positive impact on women's financial access and usage by providing expert technical advice and guidance.

Finally, annual and biannual NFIS reports must contain gender considerations, either mainstreamed or in a specific chapter, to continue to draw attention to the objectives and actions required to move the needle on women's financial inclusion.

There are specific areas on which Uganda's financial regulators can focus to support GIF. First, the widespread digitization of G2P payments could spark increased account usage if coupled with promotions and educational efforts to encourage recipients not to cash out. Efforts to make smartphones and the internet more affordable and accessible for women would help equip them with the necessary technology to utilize DFS. By and large, the incumbent financial institutions in Uganda do not recognize women as strategic segments and are not innovating solutions to serve banks or unbanked women. More work should be done to increase awareness of the business opportunity and share best practice solutions to target specific profiles of women. Finally, consumer protection efforts across the industry should be streamlined and made more publicly known. The BoU can promote private sector efforts to increase women's representation and inclusion in the workplace.

Uganda would benefit economically from a sector-wide focus on not just women's account ownership but their usage of formal financial services tailored to their unique needs. This should be informed by comprehensive and up-to-date sex- and age-disaggregated data. A new NFIS can detail the priorities, actions, and responsibilities of different ecosystem players specifically related to GIF and guide the country towards a brighter future for women.

83 Bank of Uganda. 2021. NFIS Mid-Term Review.

Ugandan woman using digital technology at Kampala Festival. (Juan Alberto Casado/iStock)

ACRONYMS

BoU	Bank of Uganda
DFS	Digital Financial Services
FITSPA	Financial Technology Service Providers Association
FSP	Financial Service Providers
G2P	Government-to-person
GIF	Gender Inclusive Finance
KYC	Know Your Customer
MFB	Microfinance Bank
MFI	Microfinance Institution
MSME	Micro, Small and Medium Enterprise
NFIS	National Financial Inclusion Strategy
NITA-U	National Information Technology Authority
NPS	National Payment Systems
PSO	Payment System Operator
ROSCAs	Rotating Savings and Credit Associations
SACCO	Savings and Credit Co-Operative Society
SDG	Sustainable Development Goal
SME	Small and Medium Enterprises
UBA	Ugandan Bankers Association
UCC	Uganda Communications Commission
UMRA	Ugandan Microfinance Regulatory Authority
VSLA	Village Savings and Loan Associations

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