GENDER-SENSITIVE RAPID RESPONSE AND CRISIS RECOVERY POLICIES
## INTRODUCTION

### OBJECTIVE OF THE TOOLKIT

#### GENDER INCLUSIVE FINANCE (GIF): WHY IT MATTERS IN CRISIS RESPONSES

A GENDER LENS AND GENDER INCLUSIVE CRISIS RESPONSE

CRISSES AS A GIF CALL-TO-ACTION FOR FINANCIAL INSTITUTIONS AND POLICYMAKERS

LEARNING FROM THE PAST EXPERIENCE OF AFI MEMBERS ON GENDER INCLUSIVE CRISIS RESPONSES “BY DESIGN”

TOOLKIT 1: STAKEHOLDER MAPPING FOR A HOLISTIC AND EFFECTIVE GENDER INCLUSIVE CRISIS RESPONSE

TOOLKIT 2: GIF DATA AND MARKET INTELLIGENCE CHECKLIST

TOOLKIT 3: GENDER INCLUSIVE CRISIS RESPONSE STRATEGY – MOVING AT THREE SPEEDS

TECHNICAL TERMS/DEFINITIONS

### ACKNOWLEDGMENTS

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

### CONTRIBUTORS

#### AFI Members:

Abderrahim Bouazza and Ibtiissam El Anzaoui (Bank al-Maghrib), Anvarul Islam (Bangladesh Bank), Bomakara Heng and Som Kossov (National Bank of Cambodia), Dr. Naa Anyeley Akofo-Sowah and Clarissa Kudowor (Bank of Ghana), Dominic Sikakau, George Awap, and Saliya Ranasinghe (Bank Papua New Guinea, and Centre for Excellence in Financial Inclusion), Irene Saadeh (Palestine Monetary Authority), Jorge Andrés Moncayo (Superintendencia de Economía Popular y Solidaria SEPS, Ecuador), Joyce Okello (Bank of Uganda), Ebah Nasr, Khaled Bassiouny, Mohamed Helmy, and Rasha Negm, (Central Bank of Egypt), Dr. Christian Tondo and María Fernanda Carrón (Banco Central del Paraguay), Akata Taito, lina Mumbi, Samah al-Abbasi, and Wati Seeto (Reserve Bank of Fiji), Rachel Mushosho (Reserve Bank of Zimbabwe).


From the AFI Management Unit: Audrey Hove (Specialist, Gender Inclusive Finance), Beryl Tan (Senior Program Analyst, Gender Inclusive Finance), Helen Walbev (Head, Gender Inclusive Finance), Johanna Nymann (Head, Inclusive Green Finance), Ghiyazuddin Mohammad (Senior Manager, Digital Financial Services), Elik Boletawa (Director, Policy Programs & Implementation), Katia Mehanneche (Regional Manager, Arab Region), Ritesh Thakkar (Senior Manager, Asia Region), and Zaira Badillo, (Head, Latin America & Caribbean Regional Office).

AFI partners and stakeholders: Dr. Jon Frost (Bank of International Settlements), Inez Murray (Financial Alliance for Women), Isabelle Carboni (GSMA), Pia Tayag (UN Secretary General’s Special Advocate for Financial Inclusion), Rachel Freeman (tyme Bank), and Wendy Teleki (World Bank, We-Fi).

We would like to extend a special thanks to ConsumerCentriX Sàrl (Consultants) for their contribution to this toolkit.

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

This publication is supported by the Bill & Melinda Gates Foundation under AFI’s COVID-19 Policy Response.

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

Global emergencies, such as the COVID-19 pandemic, present a daunting task for those responsible for responding to and mitigating the economic and societal impacts of such crises. These types of global emergencies present a unique challenge as they occur suddenly, can have little precedence, spread quite rapidly causing widespread socioeconomic shocks, and are uncertain in their progression.

Policymakers are often found trying to understand the nature of the crisis and the potential path of its impact and spread while simultaneously designing and introducing crisis response policies. This places a significant burden on any nation’s governments and policymakers.

In the fire-fighting crisis response phase and pre-recovery phase, the focus of policymakers can detract from the issue of women and gender equality. Women are disproportionately impacted by crises associated with COVID-19 (health, but also financial and economic). Additionally, women make up a significant portion of the informal economy in most developing and emerging economies, and have disproportionately higher responsibilities for unpaid care in households - for instance, raising children, looking after the sick and elderly, preparing food, and running and maintaining household finances.

The majority of AFI members surveyed as part of the AFI Special Report, “Closing the Financial Inclusion Gender Gap During the Crisis and Afterwards,” indicated women in their respective countries as more negatively affected by the pandemic due to the constraints of unpaid domestic care responsibilities and sectoral trends.1 Over half of the respondents saw an equal or higher negative impact on women in all aspects of financial inclusion and felt that women were pushed into loan default more than men.2 It is also notable that even though employment levels among men have, in many instances, nearly caught up to pre-pandemic levels, this is not the case for women.3

Neglecting women and a specific prioritization of women in a crisis response leads to a worsening of the gender gap in any post-crisis economy, a reduction in gender inclusive policies and economic or financial structures, and a less resilient and equitable economy, financial sector and system, and society in the longer-term. The erosion of pre-crisis gains in gender equality and women’s empowerment can be mitigated or fully avoided by prioritizing a gender lens or gender inclusive crisis response and policymaking process.

1 Survey of AFI members conducted in November and December 2021. Only one respondent cited men being more affected due to sectoral impacts. Four respondents did not discern any consistent gender patterns to the pandemic’s impact.

2 Survey of AFI members conducted in November and December 2021 with responses from 30 different countries, of which 22 were fully completed questionnaires and eight were partially completed.

OBJECTIVE OF THE TOOLKIT

This toolkit, which provides practical guidance on designing and introducing gender-sensitive and gender inclusive crisis responses that promote a more equitable crisis impact and resilient economic recovery, aims to lower the potential impact on women and their families in any future crisis.

It is designed to be used by those with an interest in policy design and crisis responses, even if they do not necessarily have expertise in these areas, with a gender lens focusing on women’s financial inclusion. This toolkit compliments the AFI Special Report “Closing the Financial Inclusion Gender Gap During the Crisis and Afterwards” and should be used in conjunction with it.

THE TOOLKIT:

- Provides an understanding of Gender Inclusive Finance (GIF) and why it matters in crisis response and recovery
- Identifies and details specific policy interventions for gender lens and gender inclusive crisis responses and recovery strategies
- Provides guidance on how to embed a gender lens into policymaking processes

---

This toolkit is intended primarily for public sector policymakers and financial system regulators who are responsible for the development of crisis responses, gender-sensitive policies, and regulations to address crises that disrupt social and economic activities.

Specifically, this toolkit can be helpful to:

1. Countries and national authorities that:
   - Have already implemented gender inclusive policies to address past or existing crises and understand the value of adopting additional gender inclusive policies to build resilience for the future.
   - Are in the process of developing gender inclusive policies to address existing or future crises.
   - Recognize the need to develop new crises response policies and plan to ensure these are gender inclusive.

2. Other stakeholders relevant in a crisis response can introduce gender inclusive crisis tools and coordinate with the government response, especially:
   - Financial Services Providers (FSPs)
   - Women’s empowerment civil society organizations

The toolkit assumes a basic familiarity with:

- Issues of financial inclusion and respective policies.
- The regulation of formal financial service providers, such as banks, microfinance institutions or savings and credit cooperatives.
- Disruptions to the financial sector during a crisis.
- Financial services industry products and issues.
- Public sector crisis responses to a range of crises, including economic and financial crises, natural catastrophes, public health crises (e.g. COVID-19 pandemic, Ebola virus epidemic), and geopolitical crises.

However, it does not assume expertise in financial inclusion, or financial inclusion policies, products, and crisis responses, particularly in its form with a gender-lens.
Women are more vulnerable to income shocks – not least due to their higher participation in the informal economy and dependency as unpaid caregivers. Women need targeted financial and livelihood support to sustain aggregate demand in times of crisis and economic shocks, and to ensure that they and their families do not slip further into poverty. As women are responsible for day-to-day household finances and providing unpaid care to the most vulnerable, such as children, sick or disabled family members, and the elderly, any shocks they experience have a significant multiplier effect. Economically empowered and productive women lead to better outcomes for all, as they are better equipped to withstand crises.

Neglecting the impact of shocks on women can worsen and prolong crises, as the human capital built by women within their families and societies may suffer long-term damage.

At the level of the financial sector, GIF has been shown to improve the terms for funding the private sector by reducing the cost-of-funds, lowering the risks of liquidity outflows, and diversifying loan portfolios and risk profiles. These benefits and the improvements in macroeconomic stability resulting from women’s inclusion should limit shocks to the financial system and enhance its resilience. The intention of GIF is to fully include and activate women as economic agents by promoting access to and usage of formal financial services that drive positive outcomes for women, their families, and communities.
Therefore, politically and economically, policymakers and FSPs should prioritize gender inclusive and gender lens-based crisis and non-crisis economic policy design. As the largest unserved and underserved constituency and closely linked to many vulnerable groups, women should be differentiated and targeted separately from marginalized population groups. What is most effective is to embed strong gender-specific foundations in the country’s policy development processes so that any policy response, whether in a crisis or not, incorporates a gender perspective. In a survey of AFI members, 14 out of 22 respondents strongly agreed or agreed (giving the highest two out of five degrees of agreement) with the statement that this was, by far, the most important policy priority of the pandemic.10

The majority of AFI members surveyed as part of Closing the Financial Inclusion Gender Gap During the Crisis and Afterwards, a AFI Special Report, indicated that women in their respective countries were more negatively affected by the pandemic due to the constraints of unpaid domestic care responsibilities and sectoral trends.11 More than half of respondents saw an equal or higher negative impact on women in all aspects of financial inclusion and felt that they were pushed into loan default more than men. Some AFI members surveyed lacked data to assess the impact of the pandemic on financial services usage, and only one member surveyed felt that men were disproportionately affected in this regard.12

The COVID-19 pandemic has shown that crises affect women more negatively than men, reversing even the pre-pandemic progress made in gender equality and women’s empowerment. According to UN Women, the International Labour Organization, McKinsey, and the Economist, women have been impacted more adversely by the pandemic socially, economically, and financially. Concentration in informal work also meant that women were often unable to access conventional government support efforts disbursed to the formal sector and its employees.

A total of 740 million women working in the informal sector suffered a 60 percent drop in income.13 Overall, women’s employment was found to be 19 percent more at risk compared to that of men.14

These challenges are compounded by gendered norms that assign women responsibility for unpaid housework, elder care, childcare, and educating children at home during lockdowns. Unexpected healthcare expenditures linked to their care responsibilities added financial stress. For women living in emerging markets and in the prime caring age of 25 to 34 years, the pandemic was seen as causing poverty more frequently by 20 percent compared to their male peers; while 47 million women and girls were expected to be pushed into extreme poverty.15 Even for some in the middle class, where remote work was or has been made an option, there is evidence that they will weigh more on women’s earnings and career perspectives than those of men.16

Disproportionate layoffs of women have been an outcome of the tendency of employers to first reduce part-time staff, where women are overrepresented, and the social pressure to prioritize men as primary breadwinners for the remaining jobs. It is also worth noting that while male employment levels had, in many instances, nearly caught up to pre-pandemic levels, women’s employment had not.17

International remittance payments, which are traditionally received by women in many countries or sent by women to their families, were adversely impacted because most of these transactions were not digitized and incur higher fees.18 Unbanked and under-banked women often face comparatively high

---

10 Survey of AFI members conducted in November and December 2021.
11 Survey of AFI members conducted in November and December 2021. Only one respondent cited men being more affected due to sectoral impact. 4 respondents did not discern any consistent gender patterns to the pandemic’s impact.
12 Survey of AFI members conducted in November and December 2021 with responses from 30 different countries, of which 22 fully completed the questionnaires with eight partially completed.
18 Knomad. Remittances in Crisis - How to Keep them Flowing. Available at: https://www.knomad.org/covid-19-remittances-call-to-action/
fees imposed by conventional providers, which lowers the inflow of purchasing power (a two percent fee reduction would be worth USD10.6 billion).19 Therefore, unless urgently addressed, the setbacks experienced by girls and women due to the pandemic will likely accumulate and form a continued medium to long-term drag on economic growth. Policymakers need to actively include a gender lens and gender inclusive policy response in their economies to prevent a case of socioeconomic “long COVID”, which would hinder the potential of women’s human capital and further entrench economic and social inequalities for women and children. Women’s inclusion presents a multi-trillion-dollar opportunity for women’s economic inclusion20 in developing countries, and there is no need to forgo this potential.

Encouraging evidence is mounting (including in large countries such as Bangladesh, Egypt, Nigeria and Pakistan21) that gender inclusive policies can reverse previously widening gender inequality or access gaps. The contributions of women to faster and more sustainable growth, which GIF can help unlock, are increasingly being understood. The pandemic responses by countries such as Togo, Paraguay, and Costa Rica have added tangible evidence that a gender lens can dampen the poverty and economic impact of a crisis.22 Costa Rica’s response to the pandemic included both a gender and environmental sustainability strategy, demonstrating that Keynesian-style crisis policies that support the economy can be designed and implemented to achieve green finance, environmental protection, and climate change goals, while also cushioning the impact of a crisis on the economy.

Furthermore, both before and during the pandemic, policymakers had success in rallying FSPs to more (gender) inclusive finance, often through digital financial services (DFS). In markets like Togo and Mozambique, policymakers were able to develop pragmatic schemes to support the informal economy at scale with short lead times, even when pre-pandemic rates of DFS usage were well below those in East Africa, and the macroeconomic situation was challenging.23 In some markets, competition from new FSP entrants often led banks to upgrade their alternative channels and actively compete for lower-income clients and informal businesses, such as NMB and CRDB in Tanzania, and KCB and Equity Bank in Kenya.

Given the demonstrated importance of GIF and the examples of successful crisis responses by both public and private sector actors, the pursuit of financial inclusion with a gender lens should not be neglected when crises trigger a policy focus on macroeconomic and financial sector stability. In fact, there is a need for continued investment, thinking, and policymaking responses centered on GIF both during and after crises. GIF must, therefore, be embedded in the policymaking process, and financial and economic analysis of AFI members.

---

**THE RELEVANCE OF GENDER INCLUSIVE FINANCE IN POLICYMAKING**

- **Additional economic impact:** Financial inclusion of women can contribute c. USD 12 trillion to the global GDP by 2025.
- **Strengthening economic stability and growth:** By lowering funding costs and diversification of loan portfolios, GIF improves economic stability, resilience to shocks, and overall financial and economic growth. Improved access to formal financial services: GIF promotes access to formal financial services for women, leading to positive outcomes for families and communities.
- **Contribution to SDGs achievement:** GIF supports the achievement of the United Nations Social Development Goals (SDGs) and national objectives - including reversing gender inequality, combating poverty, etc.
- **Global proof of concepts:** Financial service providers can actively support gender inclusive policies, as demonstrated by successful initiatives in various markets like Togo, Paraguay, and Costa Rica.

---

19 GPFI had indicated a global remittance volume of USD580bn, and weighted average cost of around five percent while the SDG target stands at three percent and many of the DFS providers offer rates below this benchmark. Available at: https://www.gpfi.org/sites/gpfi/files/4_WEB_2021%20Update%20to%20Leaders%20On%20Progress%20Towards%20the%20G20%2020Remittance%20Target.pdf


- as these patterns indicate that while women and men are not monolithic, the female segment of the population, on average, faces more constraints in terms of factors that enable financial inclusion (i.e. the peak of the orange population distribution is to the left of the dark red one).

**CHART 1: “CHART 1: GENDER NEUTRAL BUT MALE DRIVEN”**

**CHART 2: “TRUE GENDER NEUTRAL”**

**CHART 3: “GENDER INTELLIGENT / GENDER-INTENTIONAL”**

**CHART 4: “GENDER TRANSFORMATIVE”**

If gender considerations are not included, there is a risk of implementing a “gender-neutral” policy. However, whether or not policymakers are willing to take gender into consideration, it plays a crucial role in facilitating access to and use of formal financial solutions. Women constitute the largest sub-population that has been shown to have different patterns than men, which influence financial exclusion, such as lower income, lower labor force participation, as well as social and cultural constraints - including those that give girls and women fewer opportunities to become financially literate.

The four illustrations below indicate how gender-neutrality inherently leads to sub-optimal policy impacts.

**SHADES OF GIF POLICY: FROM NEUTRAL TO INTELLIGENT AND TRANSFORMATIVE**

Despite the existence of the Denarau Action Plan, just over 60 percent of AFI members with a National Financial Inclusive Strategy (NFIS) have incorporated gender considerations. Of these 40 AFI members, 33 have set specific targets.

The AFI Guideline Note “Integrating Gender and Women’s Financial Inclusion into National Strategies” provides more in-depth coverage of the key considerations for better integrating women’s needs into national level strategies.

If gender considerations are not included, there is a risk of implementing a “gender-neutral” policy. However, whether or not policymakers are willing to take gender into consideration, it plays a crucial role in facilitating access to and use of formal financial solutions. Women constitute the largest sub-population that has been shown to have different patterns than men, which influence financial exclusion, such as lower income, lower labor force participation, as well as social and cultural constraints - including those that give girls and women fewer opportunities to become financially literate.

The four illustrations below indicate how gender-neutrality inherently leads to sub-optimal policy impacts.

---

Although “gender neutral” suggests equality across genders or being neutral to gender differences, in practice, the term often translates to being “informed by the average male”. Due to historical gender inequalities in opportunities and access, policy and private sector decision-makers are predominantly male and from above-average socioeconomic and educational backgrounds. Without data, research or specific guidance, their policy design choices tend to be benchmarked against the realities experienced by men. As shown in Chart 1, at best, gender-neutral policy solutions work well for roughly half of men but only a clear minority of women (i.e. the blue and orange-shaded areas below the population curves).

Gender-neutral policy designs that consider a balanced position of male and female realities (Chart 2) already serve more people well, but still only benefit a minority of comparatively privileged women.

Gender-intelligent or gender-intentional solutions (Chart 3) start by setting the average woman and her constraints as a guideline. Ideally, they even go beyond that by explicitly addressing some of the most pressing constraints in the respective policy context. In this way, they stand a good chance of properly serving a majority of women but also addressing the needs of the vast majority of men.

Finally, gender-transformational policy design (Chart 4) explicitly explores the intersectionality of challenges faced by the minority of excluded and marginalized women. Such policy solutions may often require more fundamental interventions, such as a much wider availability of childcare solutions to alleviate mobility restrictions, to structurally address these tough challenges that hinder full inclusion.

These differences in policies and their design focus are far from being merely academic. They are crucial in practical policy design, whether for the purpose of financial inclusion, which aims to move beyond urban middle-class citizens with formal employment and smartphones to marginalized groups, or in the context of crisis response to ensure a broad coverage of interventions. The essential starting point is in designing policy features that explicitly take into account the realities of the most challenged and constrained target beneficiaries.

The first step in this process is to involve those excluded in policymaking. This can be achieved directly by including them as members of decision-making bodies (as outlined in AFI’s Toolkit for Increasing Gender Diversity and Women’s Leadership in Financial Regulatory Institutions), and indirectly by building out the basis for evidence-based policy design through data that is disaggregated to capture characteristics of exclusion. This can be done through surveys, questionnaires and interviews, or by means of involving stakeholders who work directly with these vulnerable, marginalized, or excluded groups.

The charts above show that concerns about reverse gender discrimination are unfounded. Gender-sensitive and transformative approaches are about “designing for inclusion” similar to providing access ramps at buildings. Their beneficiaries include both men and women.

The logic of how a gender lens is applied differs by the objectives of the stakeholders involved. In a commercial context, designing a successful value proposition calls for a customer-centric (i.e. segment-specific) approach. Here, a gender lens is about highlighting the persistent differences that may warrant a dedicated women’s market strategy and proposition. The design of such an offer would, in turn, be benchmarked against the realities of the subsegment of women most relevant to a FSP’s strategy.

For financial sector policymakers, using a gender lens involves a different logic. What counts is the setting of uniform standards and supervising their consistent application. When financial inclusion objectives are prioritized, this logic aims to maximize coverage of the potential market. In terms of the population charts shown above, this means maximizing the population covered under the two gender distributions by shifting the benchmark that informs policy choices to the left (i.e. towards greater challenges and constraints).

As the Palestine Monetary Authority (PMA) deepened its understanding of gender issues, it recognized the relevance of issues beyond its own regulatory scope. In Lebanon, civil status law considers men as the sole legal guardian of children. Consequently, obtaining consent from fathers is required to open an account on behalf of children (most often to save for their future education), and fathers are free to withdraw funds from these accounts without the mother’s knowledge or consent. This affected all women, regardless of their wealth or education. However, the PMA found ways to address this issue without the need to change civil status law: First, the PMA instructed banks to open children’s accounts requested by women as sub-accounts under the mother’s name, and second, the PMA launched an awareness campaign to highlight these potential unintended outcomes and the new solution. Simplifying the process of setting up and securing these funds for longer-term family savings can help safeguard financial resources throughout crises.

The United Kingdom’s finance ministry (HM Treasury) launched an initiative to boost the country’s ecosystem for starting and growing businesses. A 2019 review led by Alison Rose, one of the country’s most senior bankers, identified shortfalls and hurdles that particularly affect female entrepreneurs, areas where peer countries demonstrated better performance, and how many of these issues would be difficult to address by laws and regulations. Instead, the “Investing in Women Code” was drawn up as a voluntary commitment open to all organizations involved in financing entrepreneurs and SMEs in conjunction with the government. The code involved designating responsible senior executives for this topic, collecting jointly agreed key performance indicators to measure baselines and progress, and adopting internal practices supportive of female entrepreneurs. By June 2022, 160 institutions, including four of the six leading banks, angel investors, VCs, and growth capital firms, had joined the Code. By explicitly highlighting the issue and bringing prestige to its resolution, this initiative initiated a transformation that the World Bank’s We-Fi initiative is seeking to replicate globally. The UK Code is credited with mitigating the impact of the pandemic on the availability of finance for women-led businesses during the shocks of the COVID-19 pandemic.
Time-use surveys are proliferating and documenting the disproportionate amount of unpaid care work being performed by women. This is one of the causes behind the differences in average income, particularly through its impact on workforce participation, which in addition to national level statistical data, is captured in the “Gender Development Index” in UNDP’s Human Development Report. In South Asia and the Arab States, women’s GNI per capita is estimated at less than 25 percent than that of men.

Higher risk-consciousness among women (and possible selection bias) may be reflected in lower levels of non-performing loans, as documented by the Financial Alliance for Women in their annual surveys of members and the IFC’s “Banking on Women” program. Mexico’s financial sector regulator, CNBV, has translated these insights into lower risk capital requirements for loans to women.

The CAF has documented gender gaps in financial capabilities, such as financial planning, savings, setting financial targets, retirement planning, and strategies for managing financial challenges. The design of financial literacy campaigns should incorporate such insights from empirical research and country-level data.

Issues related gender differences in financial resilience, which are important particularly during crises, are also documented in the CAF study. The latest edition of the World Bank’s Global Findex surveys incorporate, for the first time, questions about the ability to come up with emergency funds within 30 days. All regions and development groups, excluding East Asia and the Pacific and upper middle-income countries, reported that women more frequently lack the ability to come up with such funds.

Finscope-style large-scale nationally representative surveys serve as examples for exploring these aspects within the context of knowledge, access to, and usage of financial services. They demonstrate the overall value of local demand-side data for evidence-based policymaking.

Risk considerations are key aspects of financial decision-making and appear to display notable gender differences, which may intensify in the area of finance, including among financial professionals.

A simple checklist can be created to assess what gender differences can be considered in any crisis response. A sample is available in Toolkit 2.
A GENDER LENS AND GENDER INCLUSIVE CRISIS RESPONSE

SIX BUILDING BLOCKS FOR CRISIS RESPONSE WITH A GENDER LENS

The application of a GIF lens to any crisis intervention covers various aspects of policymaking and the financial sector.

Below, we highlight the KEY BUILDING BLOCKS to consider. More specific crisis intervention tools and policy development processes are included in Toolkits 1 to 3 at the end of this document.

1. THE ROLE OF THE FINANCIAL REGULATOR IN A GIF RESPONSE
   - Act as a key enabler for GIF, incl. technology and infrastructure

2. HUMAN-CENTERED DESIGN (HCD) LENS
   - Apply gender lens as a part of HCD in policy development

3. DIGITAL FINANCIAL SERVICES
   - Incorporate digital finance solutions as a crisis response policy

4. LEVERAGING EXISTING G2P & CONDITIONAL CASH TRANSFER PROGRAMS
   - Make use of existing programs (esp. female-targeted)

5. TARGETING WOMEN - LED BUSINESSES
   - Include women-led businesses in crisis response policies

6. COMBINING CLIMATE CHANGE & SUSTAINABILITY WITH GIF POLICIES
   - Leverage sustainable finance (e.g. green finance)

THE ROLE OF THE FINANCIAL REGULATOR IN A GIF RESPONSE

Responding effectively to a crisis is an issue of leadership. As the institutional standard-bearers for financial inclusion, AFI members cannot rely on others to take the lead in advocating for GIF as a policy priority and implementing it during times of crisis management, when governments are likely to have a narrow focus on “fire-fighting”.

Financial sector policymakers also have the institutional responsibility and convening power needed to engage with other types of stakeholders whose contributions are required for effective crisis response. Without regulators taking on this role, a GIF-informed crisis response is unlikely to materialize. And while stakeholder engagement on financial inclusion issues varies widely in normal times, close engagement becomes a priority for an effective gender lens crisis response.

During a crisis like the pandemic, financial institutions face immense uncertainty, leading to a rapidly decreased risk appetite and management attention focused on consolidating the quality of their loan portfolios - thereby pro-cyclically exacerbating the effects of the crisis. Furthermore, GIF remains a comparatively novel topic, and most FSPs, from commercial banks
to FinTechs, have limited expertise in this area. Given the importance of digital service channels in many crisis contexts, coordination by all major service providers in this space, including mobile money providers, FinTechs, payments service banks, super apps and platforms, etc. is of particular importance.

Moreover, the issues surrounding women’s financial inclusion, including the obstacles and potential enablers, are complex and largely extend beyond the scope of AFI members. Gender issues are increasingly recognized as human rights concerns and central to socioeconomic development, leading to the emergence of civil society organizations and public sector entities with a central focus on gender in many countries. These entities often have the capacity to provide non-financial support such as advice, training, networking, and digital tools, which are crucial when complementing financial assistance during crises where women, their families, and businesses require guidance and support.

As a result, it is more effective for AFI members to establish formats of coordination and collaboration with these stakeholders rather than allocating extensive resources related to gender. Institutional collaboration is a much more viable option for integrating a gender lens into crisis response policies.

Mapping relevant stakeholders and establishing effective mechanisms of coordination and collaboration are, therefore, key for regulators to fulfill and effectively execute their role in gender lens crisis response (see Toolkit 1).

Leadership by AFI members is essential to ensure that crisis responses are gender-responsive and live up to their potential. While digital technology is a crucial enabler in any given intervention (e.g. on payments solutions and use cases) improving services and satisfaction for existing clients, it alone will not promote (women’s) financial inclusion. Evidence suggests that while FinTechs continue to show gender gaps beyond those of conventional providers, they have yet to play the transformative role they could. In short, purposeful regulatory design with a gender lens is necessary for the application of DFS. Regulators should consider aspects such as improvements in technology and infrastructure, enabling regulations, cross-firm usage of agents and merchants, interoperability, and licensing arrangements linked to GfI.

A gender lens aligns with the principles informing human-centered design (HCD), which places the user or intended beneficiary at the center of the thought process, taking into account their realities, needs, and constraints. Including the intended target groups in the design and deployment of solutions makes the policy more effective. The primary means by which this is initiated, both during and outside of crisis situations, are through stakeholder relationships with organizations that promote and interact with women (see Toolkit 1), and data in all areas related to women and analyzed by gender (see Toolkit 2). The GfI lens is most effective when all institutions involved in crisis responses and policymaking apply it. Therefore, incorporating both solutions mentioned above throughout the crisis response process and post-crisis policymaking process is essential.

Some countries may find it beneficial and efficient to actively involve the end-beneficiary in the policy design process. Two approaches are:

1. Incorporating actual target beneficiaries into the process, even if only a small number, and basing the selection on a socioeconomic profile that represents those facing more challenges than the average population. Important insights on potential pitfalls and opportunities can be gained by involving and walking them through the concept and “user journey” they would experience.

2. Plan for and establish easy-to-use formats to receive direct user feedback on the policy design and technical architecture of any policies or tools deployed. This can be done, for example, as part of the consumer protection framework.

RESOURCES:
- The “Human Account” by Rockefeller Philanthropy Advisors and the Bill & Melinda Gates Foundation provides behavioral and psychometric data on 35 segments representing nearly two billion unserved and underserved people, especially women, and offers guidance on how to apply this for solution design.
- UNCDF provides evidence from Uganda on applying HCD in a rural context to digitize women’s savings.

---

27 See, for instance, research by the BIS: https://www.bis.org/publ/work931.htm as well as the Financial Alliance for Women: https://financialallianceforwomen.org/download/how-fintechs-can-capture-the-female-economy/


29 Please see: https://www.thehumanaccount.com/

30 Available at: https://www.findevgateway.org/sites/default/files/publications/files/85992_2.pdf
By incorporating HCD principles for financial inclusion, AFI members can develop policies and interventions that are gender intelligent by design. Including the perspective and, ideally, the participation of women as beneficiaries or affected individuals throughout all stages of the policy process makes it less likely that preconceived notions and unconscious biases override the realities faced by women.

An important realization is that women tend to be more vulnerable in their cashflows across major lifecycle events. For example, CCX surveys in Morocco revealed that women experienced a stronger impact on their cash flow compared to men in each major life event, by at least 20 percentage points. AFI members can use this insight to inform their crisis response, for instance, by way of privileged debt moratoria for pregnant women and young mothers, or providing livelihood support to parents of school-age children during lockdowns. Leading banks have already incorporated this “Life Moments” approach in their value propositions for the women’s market.

With mobile ownership and usage in most countries becoming near-universal (though gender gaps remain substantial in smartphones and mobile internet), the benefits of DFS in overcoming women’s time and mobility constraints make them a crucial component in a gender-intelligent crisis response in most contexts. During the COVID-19 pandemic, DFS accounted for the second highest number of policy responses, with 20 out of 104 crisis mitigation policies and 28 recovery policies specifically related to the DFS space. However, there is still progress to be made in effectively incorporating a GIF angle into such frameworks.

According to AFI’s tracker of GIF interventions during the pandemic, only eight out of 108 interventions were filed under DFS, while the Policy Framework for Leveraging DFS in Crisis Response shows that six out of 10 regulators surveyed had only gender neutral DFS policies, and the majority did not feel their DFS policies would result in a stronger boost to women’s DFS adoption. In fact, nearly one in five even expected lower growth for women.

While DFS solutions were deployed during the crisis for making payments to vulnerable groups, including women, translating this into DFS adoption and continued use remains a challenge, for which the associated Special Report and Case Studies, as well as this toolkit provide more inspiration. The wider challenge in the adoption of DFS can be overcome by identifying synergies with use cases for women that are not driven by financial needs. For instance, targeting healthcare, agriculture, MSME business activity, or social assistance can encourage greater adoption by women. Therefore, it is important to consider the financial needs of women within their wider lifestyles or lifecycles and consider a multi-stakeholder or multi-organization approach. The Case Studies of Multisectoral Approaches to Integrating Digital Financial Services for Women’s Financial Inclusion provide valuable examples in this regard.

AFI has published a Policy Framework for Leveraging DFS to Respond to Global Emergencies, which provides insights in effectively deploying and leveraging DFS in a crisis, in addition to the Policy Framework for Women’s Financial Inclusion using Digital Financial Services, that introduces the G.R.I.D. framework, which encompasses the four dimensions of gender-sensitive policy and DFS legislation, regulations, infrastructure, and demand-side considerations, including consumer protection and financial literacy.


33 Survey of AFI members conducted in November and December 2021.


35 COVID-19 gender lens crisis response case studies that highlight DFS activities cover Bangladesh, Egypt, Fiji, Paraguay, and Zimbabwe.

36 Available at: https://www.afi-global.org/publications/case-studies-to-multisectoral-approaches-to-integrating-digital-financial-services-for-womens-financial-inclusion/

37 Available at: https://www.afi-global.org/publications/policy-framework-for-womens-financial-inclusion-using-digital-financial-services/
In looking beyond crises and deploying DFS to promote financial inclusion, regulators should consider incorporating gender-responsive indicators and objectives in the licensing of digital banks and digital payment providers. However, issues over standards and regulations would arise in the DFS space, just as in branch-based finance, with any efforts to dismantle barriers to adoption.

Under lockdown conditions, the Central Bank of Egypt addressed one such barrier by temporarily facilitating fully remote client acquisition and onboarding. The experience gained from this measure informed policy dialogues with stakeholders such as the Ministry of the Interior, which is responsible for Anti-Money Laundering and Counter-Terrorist Financing.

**RESOURCES:**
- Policy Model for Consumer Protection for Digital Financial Services
- COVID-19 DFS Policy Framework
- The Women & Money program by the Bill & Melinda Gates Foundation provides insights and ideas on how to more effectively interest women and onboard them in DFS, especially with respect to payments.
- Leveraging Digital ID and E-KYC to Deliver Social Protection Programs and Advance Financial Inclusion During the COVID-19 Pandemic and Future Crises
- Sustaining an Inclusive Digital Financial Services (DFS) Ecosystem During a Global Emergency

Many countries, especially in Latin America, have gained valuable experience with conditional cash-transfers (CCT) for a limited set of beneficiaries. These programs typically focus exclusively or primarily on women as heads of households and those responsible for targeted social outcomes, such as children’s continued education. Often, such programs have already been partially digitized, with beneficiaries transitioning to prepaid cards or mobile wallets.

These programs, which are an excellent starting point to swiftly provide financial assistance, can then be shifted to gender-sensitive policies in response to a crisis by increasing the frequency or size of transfers.

---

38 AFI member interview, November 2021.
41 Available at: https://www.womenandmoney.design/
43 Available at: https://www.afi-global.org/publications/sustaining-an-inclusive-digital-financial-services-dfs-ecosystem-during-a-global-emergency/
or expanding the list of eligible beneficiaries, as was the case in Indonesia, Paraguay, and Togo (see a later chapter). Colombia and other countries took a similar route of G2P to otherwise unprotected target groups, typically with women a majority among beneficiaries. The results were impressive out of 477 million new social protection digital accounts opened during the first two years of the pandemic globally, 55 percent were by women. For 80 million women, this was their first ever account. In Brazil alone, G2P reached 14 million women using a digital savings account for the first time. Such tools will certainly play an important role in a country’s understanding of how to apply a gender lens to their crisis response.

**Gender Lens in Practice: Paraguay**

Paraguayan authorities responded quickly to the economic collapse by implementing stringent lockdown measures early on, aiming to provide support to vulnerable groups, such as informal workers (which are overrepresented by women) and to increase existing conditional cash transfers for poor households headed by women. However, many of these households had not yet implemented a DFS system. Banco Central del Paraguay (BCP) hoped to quickly increase the number of DFS users and distribute the majority of funds through this channel, thanks to pro-inclusion client acquisition and recruitment rules. Due to the existing structure of an NFIS working group with leading mobile wallet providers and several years of constructive collaboration, a unified solution that works on all major wallets was rolled out in less than a month and supported by effective communications with target audiences to increase adoption among roughly 25 percent of adults in Paraguay, contributing to the reduction in gender disparities.

**Targeting Women-led Businesses**

With 26 out of 104 recorded Covid-19 policies, SME finance was the most frequently included category in AFI’s COVID-19 Policy Tracker. However, the relevance and integration of a gender lens is not yet strongly ingrained among many FSPs and public sector stakeholders, aside from a focus on encouraging women’s entrepreneurship. Women-led SMEs face specific hurdles that need to be addressed, such as inherent biases assuming a higher risk profile or lower returns, as well as hurdles in accessing lending. Most interventions targeting women and MSMEs have been limited to support programs that allocate only a share of the overall loan volume designated for women entrepreneurs or women-led SMEs. This may not be the most effective policy instrument given the challenges faced by women entrepreneurs as a result of the crisis, and the fact that lenders are generally reluctant to take on new risks in times of great uncertainty.

During a crisis, women-owned or led businesses are likely to face greater difficulties in accessing funding compared to their male counterparts. Female-owned businesses tend to be newer and smaller, possess limited audited financial data, operate in sectors affected by lockdown measures (such as retail commerce), have lower profit margins due to lower entry barriers, are less frequently integrated into the value chains of larger companies, and have less fixed collateral.

**Combining Climate Change and Environmental Sustainability with GIF Policies**

The recommendations of the DFS Policy Framework call for the mainstreaming of inclusive green finance aspects into crisis responses. This includes direct investments and projects with a focus on environmental sustainability, imposing green requirements on companies receiving support, or using a certain percentage of government assistance for green purposes or creating green jobs. An example of such a response, linked to GIF, can be found in Costa Rica, where targeted funding is provided to women who tap into specific business opportunities related

---


45 Available at: [https://www.giz.de/expertise/downloads/2021%20giz%20womens%20financial%20inclusion%20toolkit.pdf](https://www.giz.de/expertise/downloads/2021%20giz%20womens%20financial%20inclusion%20toolkit.pdf)
to environmental sustainability, including support for first-time entrepreneurs. AFI member countries should explore the implementation of such policies in future crisis responses.

AFI already offers guidance to its members in bringing Inclusive Green Finance (IGF) into NFIs, as well as the intersection of IGF with Gender Inclusive Finance (GIF). The experience and knowledge gained in building resilience to climate change-induced disasters through financial inclusion, as documented by AFI, are likely to be valuable for crises responses.

RESOURCES

- Towards an Inclusive Green Future: An Analysis of the Intersection Between Inclusive Green Finance and Gender Inclusive Finance
- Leveraging Digital Financial Services to Advance Inclusive Green Finance Policies

GENDER LENS IN PRACTICE: COSTA RICA

In AFI’s GIF Tracker of COVID-19 responses, only one intervention incorporated an environmental sustainability angle: Women + Nature. The Government of Costa Rica launched this program as a strategic framework for gender equality and to empower women to manage, conserve, and sustainably use biodiversity, in alignment with International Day of Biological Diversity and to mitigate the pandemic’s socioeconomic impacts. The program is aimed at environmental managers and integrates gender as a cross-sectional perspective in all related activities conducted by UNDP in the country. Through a combination of non-financial services and long-term credits with favorable terms, IGF loans totaling roughly USD1.4 million were disbursed to rural women. Additionally, 600 women were contracted and paid (via DFS) for their environmental services, as responsible stewards of biodiversity, related to woods and forest plantations as carbon sinks. Several hundred women were trained on conservation measures, while a host of biodiversity stakeholder organizations were trained on adopting a gender lens. This initiative is jointly led by the Ministry of Environment and Energy (MINAE), UNDP, and the Office of the First Vice President of the Republic.


A THREE-SPEED POLICY RESPONSE FRAMEWORK

A crisis necessitates that policymakers act with agility, speed, and without complete knowledge of the nature or progression of the crisis.

The global impacts of the COVID-19 pandemic and 2008-09 financial crisis highlighted this reality. Some crises emerge suddenly, without warning signals or by triggering cautionary indicators typically monitored by AFI members and policymakers. Other crises, even when they do provide warnings, are unpredictable or unprecedented in their scope, impact, and spread. This adds complexity to any crisis response as policymakers must simultaneously gauge the nature of the crisis and its potential socioeconomic and financial consequences, while selecting or designing the appropriate tools in real-time to cushion or mitigate its impact.

A three-speed framework can be employed to guide a crisis response, based on the speed by which policymakers must act. In this framework, policies are designed, created, tested, reviewed, and deployed based on the category they fall into, such as the speed of the required response (see Toolkit 3 for more details).

1. SPEED 1: FAST-PACED “FIRE-FIGHTING”
   - Immediate responses to mitigate impact of the crisis using existing or novel, untested tools such as liquidity provision to banks, interest rate changes, and G2P transfers
   - Requires the crisis committee and AFI members to regularly review the impact of each tool used and quickly adjust or transition the tools once they are in place

2. SPEED 2: ENABLING THE RECOVERY
   - Post-crisis stabilization, introducing measures to enable recovery, for example, expanding the set of policy instruments already in use, stabilizing monetary policy, introducing new data collection
   - Tools and interventions in this stage are better planned and are based on the data on the impact of the crisis and on the instruments used in Speed 1

3. SPEED 3: “BUILDING BACK BETTER” FOR RESILIENCE
   - Policies introduced that aim to shape the structure of the financial sector and the economy in the medium to long term - for instance, changes in the regulatory framework, design and introduction of new monetary policy or financial stability policy instruments, new coordination committees
   - Includes embedding new tools or approaches introduced in Speed 1 or Speed 2 with deeper design, research and consultation, or withdrawing emergency tools that are no longer needed
   - Lessons learned from the crisis response are incorporated into policies introduced in this phase through measurement and evaluation

All measures introduced at the three speeds mentioned above can be integrated into the country’s financial and economic system on a permanent basis, or they can be withdrawn after a detailed analysis of the lessons learned or the impact of each measure.
For instance, some Speed 1 measures, such as fee waivers and minimum Know Your Client (KYC) requirements, facilitate the rapid inclusion of women and other unbanked or undigitized populations into G2P financial assistance programs and enable business transactions and financing. However, at Speed 3, these measures may need to be paused, pending a more detailed impact assessment and tailored adjustments to ensure that the negative externalities of such measures do not undermine the country's longer-term economic resilience and financial stability. Waiving detailed KYC requirements, for example, can create vulnerabilities leading to money laundering and terrorism financing, while poorly designed fee waivers can pose risks to the business models of some digital financial service providers, thereby jeopardizing the digitization of the economy and financial services over the longer-term.

A three-speed approach recognizes a gender lens crisis response as an essential part of the fast-paced “firefighting” phase, which will provide important lessons for post-crisis recovery policies, such as which measures to strengthen or make permanent, while strengthening the institutional collaborations needed to achieve longer-term economic and financial stability, and resilience, or to “build back better”.

There is also a reciprocal relationship between the third speed of the crisis response, focused on the structural transformation agenda, and building future capacities to deliver fast-paced “firefighting” that is fit for purpose. Though the exact characteristics may remain unpredictable, three areas likely to pose ongoing and increasingly greater structural threats, that require advance planning by AFI members are:

- Climate change
- Public health emergencies
- Geopolitics

AFI members should proactively plan for crises emerging from these sources so they increasingly become part of their agenda going forward, in addition to already familiar crises, such as those triggered by balance of payments, business cycle downturns, and excessive financial sector debt. The best time to start preparing for these challenges is now.

For Speed 3, AFI recently published an updated version of its Guideline Note54 on Integrating Gender and Women’s Financial Inclusion into National Strategies. Well-established and equipped with an effective organizational structure for implementation, NFIS can themselves be an important element of resilience55 to crises. However, some current data indicates that any advances in (digital) financial inclusion for women and men cannot be taken for granted. Despite overall growth, globally, only slightly more than one in three registered mobile wallets are active,56 while in countries like Bangladesh and Paraguay, there has been a leveling-off of user numbers after a growth phase driven by the COVID-19 response. The need to secure and build on advances made through crisis responses remains very relevant for GIF, as women, with their reliance on informal sources of income, many small everyday transactions, and precautionary savings in small increments, are deeply embedded in the cash economy.

Given the crucial role of women in the economy and financial sector, as well as the disproportionately negative impact of crises on women detailed earlier in this report, it is imperative that each of the three speeds incorporate a gender lens and gender inclusive policy design and deployment process. Toolkit 3 was provided to enable AFI members to have a gender inclusive and gender lens-based crisis response, and should be reviewed even outside of a crisis to ensure that policymaking incorporates a gender lens and gender inclusive design and deployment process from the earliest stages. The toolkit is designed to be embedded and used at any time.

The work of AFI members in applying a gender lens to a crisis response is not complete when a crisis subsides. It is considered successful when the country is better prepared for future crises due to a financial sector that is significantly more gender inclusive and experiences continuous and sustainable growth in access to and usage of formal and digital financial services.

55 Available at: https://www.afi-global.org/wp-content/uploads/2021/04/FiSNFSiCoViD-graphic_AW2.pdf
**GENDER LENS IN PRACTICE: EGYPT**

With the establishment of the National Council for Women (NCW) by law in 2000, which is affiliated with the President of the Republic, Egypt has a dedicated entity tasked with planning the advancement of women and promoting their equality in economic, social, political, and cultural rights. With a technical secretariat, specialized topical committees, and a presence in all regions, the NCW has substantial capabilities and, since 2017, has been guided by the world’s first national women’s strategy for 2030, in alignment with the Sustainable Development Goals.

Following the adoption of the Denarau Action Plan, Egypt hosted AFI’s Global Policy Forum in 2017, during which the Central Bank of Egypt (CBE) signed a Memorandum of Understanding with the NCW. Both organizations formed a high-level committee and set out joint priorities for GIF initiatives, such as rural women and “gameiya” informal savings groups. The CBE also committed to incorporating GIF considerations into regulations, DFS initiatives, and women-specific targets in its strategies in consultation with the NCW.

During the pandemic, these initiatives were intensified and contributed to a notable expansion in women’s digital financial inclusion. The NCW was also able to attract additional support from the International Finance Corporation (IFC), the Netherlands, Switzerland, and the World Economic Forum, structuring initiatives into a “Closing the Gender Gap Accelerator” that covers bank lending, but also equal pay and flexible work options to achieve transformational change.

**HOW TO DEAL, IN PRACTICE, WITH THESE VARYING TIMELINES IN THE CRISIS RESPONSE POLICY PROCESS?**

- Include financial inclusion policymaking into the previously established structures to deal with financial sector crises
- Actively prepare for the review and revision of policies following the initial phases of implementation (i.e. close the loop by bringing any measurement and evaluation activities back into the formulation-stage activities)
- Build and leverage peer relationships (directly and through AFI) to swiftly source relevant ideas for a crisis response, share experiences, and obtain “lessons learned”
- Plan from the outset for the feasible collection of data to assess impacts disaggregated by sex (and age) and be willing to do so pragmatically (i.e. if supply-side data collection is not set up, organize phone outreach, panels of targeted beneficiaries, multiple interviews with experts or stakeholders with exposure to beneficiaries, etc.)
- Maintain or increase resource allocation on efforts related to financial inclusion strategy and financial sector development to continue evaluating and advancing longer-term and structural improvements
- And finally, institutionalize new modalities and habits of collaboration with a wider set of stakeholders
As mentioned earlier, the inter-dependency of crisis responses by the public sector, especially fiscal, monetary, and financial sector regulatory policies, as well as DFS as an enabler for G2P and social assistance, on the one hand, and the complex and gendered nature of financial inclusion challenges, on the other, call for AFI members to collaborate with other stakeholders. To be ready to respond to a crisis, it is essential that AFI members form crisis awareness and coordination committees in their countries (if this is not already in place), both in governments and between the public and private sectors and civil society, within the framework of NFIS and GIF. This is further explored in the toolkits.

Initiating such collaborations as early as possible offers significant benefits, including building the necessary goodwill, institutionalizing collaborative work practices, and establishing designated bodies responsible for important aspects of policy design and implementation. These delegated efforts will contribute to an expedited and more effective crisis response.

When considering crisis policy responses, or even potential responses, and engaging the necessary stakeholders, AFI members can begin by classifying all intervention ideas using the following high-level framework. This enables policy planners to very quickly consider who is responsible and how to deploy a GIF and DFS strategy within the three-speed policy response framework.

<table>
<thead>
<tr>
<th>RESPONSIBILITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Within the direct jurisdiction of the AFI member</td>
</tr>
<tr>
<td>✓ Within the authority and expertise of one or several other non-AFI member government entities</td>
</tr>
<tr>
<td>✓ Broader ecosystem</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EXPECTED TIME TO IMPACT</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Immediate or near-term</td>
</tr>
<tr>
<td>✓ With time-lags</td>
</tr>
<tr>
<td>✓ Shaping the future economic and financial structure and environment</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DEGREE OF THE GENDER LENS AND GIF</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Fully dedicated to women (or sub-groups of women, e.g. informal workers, pregnant women, mothers, women led-companies, and women led-households)</td>
</tr>
<tr>
<td>✓ Women as one of several explicit target populations</td>
</tr>
<tr>
<td>✓ Gender inclusive and gender lens design is already incorporated, e.g. social assistance programs for women-led households</td>
</tr>
<tr>
<td>✓ Opportunity for gender inclusive design or response, e.g. higher G2P transfers for women</td>
</tr>
<tr>
<td>✓ Gender inclusive response inappropriate or harmful to the economy, society, or financial stability</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>° DEGREE OF DIGITAL FINANCIAL SERVICES (DFS)</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Essential</td>
</tr>
<tr>
<td>✓ Potentially viable</td>
</tr>
<tr>
<td>✓ Too costly financially or from a regulatory and financial stability perspective</td>
</tr>
<tr>
<td>✓ Not feasible</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TYPE OF POLICY</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ Financial Assistance</td>
</tr>
<tr>
<td>✓ Direct transfers</td>
</tr>
<tr>
<td>✓ Indirect assistance via financial sector liquidity and guaranteed lending schemes</td>
</tr>
<tr>
<td>✓ Regulatory relief</td>
</tr>
<tr>
<td>✓ Non-financial assistance, e.g. social or healthcare advice</td>
</tr>
<tr>
<td>✓ Monetary policy response</td>
</tr>
</tbody>
</table>
Just as incorporating a gender lens into the design of financial inclusion policies has recently gained traction among financial sector regulators, the availability of comprehensive information to conduct proper gender lens diagnostics is often limited. A survey of AFI members revealed challenges in data collection, including gender-disaggregated data, during the COVID-19 pandemic (see the figure below).

Among the surveyed AFI members, 43 percent reported that sex-disaggregated data was, at most, selectively available, and no dedicated gender data had been collected covering the pandemic.\(^\text{57}\)

**Have you undertaken any of the following measures to strengthen the availability of timely data during the COVID-19 pandemic?**

<table>
<thead>
<tr>
<th>Measure</th>
<th>Yes, with sex-disaggregated results</th>
<th>Yes but not available in sex-disaggregated format</th>
<th>No</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>More frequent collection of supply-side data</td>
<td>1</td>
<td>8</td>
<td>10</td>
<td>5</td>
</tr>
<tr>
<td>Rapid response surveys at repeated intervals</td>
<td>3</td>
<td>15</td>
<td>15</td>
<td>3</td>
</tr>
<tr>
<td>More extensive demand-side research</td>
<td>2</td>
<td>2</td>
<td>10</td>
<td>2</td>
</tr>
<tr>
<td>Collection of operational data from businesses</td>
<td>2</td>
<td>9</td>
<td>9</td>
<td>4</td>
</tr>
<tr>
<td>Data from technology or e-Commerce platforms</td>
<td>3</td>
<td>9</td>
<td>9</td>
<td>3</td>
</tr>
</tbody>
</table>

\(^{57}\) Survey of AFI members conducted in November and December 2021 (23 respondents for this question).
AFI members can incorporate a gender lens into their policymaking process and activities by integrating three complementary approaches when diagnosing the need for a crisis response:

- **Identified gaps, particularly those where the country lags its peers, can help AFI members understand which stakeholders to prioritize for collaboration: Those in whose competence or area of expertise these issues reside.**

- This quick assessment, or a more sophisticated analysis tailored to the priorities of any particular AFI member, will also provide a sense of where learning opportunities lie. Countries with improved financial inclusion outcomes at a similar stage of economic development and with similar obstacles to GiF may make for insightful peer-learning exchange partners in the AFI community, and likely constitute relevant reading from among AFI’s latest knowledge products on closing financial inclusion gender gaps.

- Over time, a broader set of indicators on the country’s GiF context should become a standard set of information next to those collected from the financial sector or about financial needs (see Toolkit 2).

The GIF context remains a new field to explore for most AFI member executives, and data representing the country’s context in which women’s social, economic, and financial inclusion unfolds provides an essential orientation. This context hints at which challenges and constraints gender-intentional or transformative policies need to take into consideration.

In conjunction with this policy toolkit, AFI provides an MS Excel GIF Country Benchmarking Tool (see Toolkit 2 for an explanation) to facilitate a quick-glance analysis when time is of the essence. This tool provides data related to the four categories of barriers to women’s financial inclusion that AFI highlights, for example, for National Financial Inclusion Strategies. Such a tool - or any customized similar overview - should offer several benefits to policymakers:

- A clearer sense of the enabling environment for GiF sets priorities between policy options competing for financial resources and organizational capabilities during a crisis.

- For longer-term financial inclusion priorities, such analysis can indicate to AFI members what might be promising areas for their own policies to focus on: Those where relevant gaps exist but where a sufficiently permissive setting of enabling factors are present, or where peer countries have achieved progress in the face of similar structural challenges.

- The lack of a sound basis of sex-disaggregated data to closely assess the situation and the impact of policies
for financial inclusion, GIF, and crises stands in stark contrast to the established good practice of financial sector policymakers (e.g. data on the labor market, inflation, and the risk exposures of banks). In their absence, anecdotal evidence and personal experience can easily influence gender lens policies, all the more so when facing a fast-evolving crisis that does not mirror historical patterns and affects wide sections of the population and the economy.

Data enables policymakers to better understand crises as they unfold. Moreover, crises that are unfamiliar or new to AFI members present additional demands as they need to first be understood before policy tools can be deployed. In this regard, data provides a key analytical capability to properly understand the causes, the trajectory or potential trajectory, and likely timeline of the crisis. This further enables AFI members to determine and investigate appropriate policy tools and prioritize their design and deployment. Applying a gender lens to this process adds to the challenge for policymakers, yet not having a gender lens or gender disaggregated data in a crisis leads to less resilient, inadequate, and worsening inequality outcomes in the medium to long-term for the economy and financial sector.

When AFI members approach a new crisis or impending crisis, an emphasis on gendered data should be implemented even if the in-country gendered data program is just emerging or has yet to start. Any data that is sourced and analyzed should be disaggregated by sex, such as unemployment rates, and employment by formal and informal sectors. Data at an individual, household (led by a woman, a man, or jointly), and business ownership level should be collected and analyzed on a sex-disaggregated basis. Making this a standard operating procedure for any type of evidence-based policymaking or crisis diagnosis and response highlights the importance of a gender inclusive policy response and the need to have one if absent. The next textbox and Toolkit 2 provide further direction on supply-side data collection.

The World Bank’s Women Entrepreneurs Finance Initiative (We-Fi) has proposed a global framework to systematically address data gaps in financing and supporting women entrepreneurs: the WE Finance Code. Open to local adaptation, this could provide a suitable blueprint for AFI members to mobilize commitments from their country’s financial sector. The AFI Data Portal also houses the sex-disaggregated data of AFI members and offers country and thematic profiles that are free to use.

As awareness of the relevance of different aspects of vulnerability increases, the collection of factors, such as age, ethnicity, disability, income level, and sexual orientation, including gender, for diagnostic purposes is coming onto the agenda, for example, at the Unidad de Regulación Financiera in Colombia. However, instead of tying up sex-disaggregation with such an emerging gold standard, gender data practices should be rolled out as fast as possible in an upgrade to the current standard of data collection, reporting, and analysis.

When data programs are absent or data by gender is unavailable, this should be clearly acknowledged in crisis committee presentations, papers, and discussions. Explicitly pointing out gaps in the timely availability of a proper evidence basis for GIF policy design in a crisis and in normal periods will ensure that projects are created to close the data gaps.

In a crisis, market intelligence can be collected to supplement the absence of data - opportunities to demand-side data collection are no longer limited to costly large-scale surveys with immense lead times unfit to produce insights for crisis response. Indeed, many pragmatic options from fast-response surveys to tracker panels exist (see Toolkit 2).

Furthermore, in the absence of data at the outset, during the implementation of policies, such as onboarding new DFS accounts or G2P beneficiaries, data can be collected, and in the subsequent round of discussions on the impacts of policies in the initial weeks, a gender lens will be available.

RESOURCES

- AFI’s Policy Framework on GIF-MSME Data Collection
- Financial Products and Services for Women’s Financial Inclusion: A Policy and Regulation Design Toolkit

59 Interview in August 2022.


Sex-disaggregated data is a key building block in understanding women’s financial inclusion and implementing meaningful policymaking. However, it is often not mandatory for FSPs to report such data to regulators, leading to gaps in the information available for AFI members. Reported datasets often provide only aggregated figures and account-level data rather than by individual clients, making it impossible to assess the true extent of the progression of financial inclusion across all providers. Balance sheet data is typically reported in contrast to transaction data, making it challenging to determine uptake and usage of everyday financial services. In SME banking, the absence of uniform national definitions for classifying businesses by sex creates a blind spot for regulators (beyond sole proprietorships), and FSPs must still learn how to collect, store, and process this information.

Financial sector regulators play a critical role in setting the agenda and leading the way on sex-disaggregated data, as market-level insights into gendered patterns, gaps, and business opportunities are particularly important in generating interest among FSPs in promoting GIF.

Even after more than 18 months of the pandemic, many AFI members still lack readily available evidence on its gendered impact. Only 19 percent of AFI survey respondents collected fully sex-disaggregated data prior to the pandemic. The Women’s Financial Inclusion Data (WFID) Partnership refers to only a handful of case-studies on “gender data ecosystems”, and many regulators are still in the “awareness” or early parts of the “consideration” stages of the pathway to (women’s) financial inclusion.

Factors such as country context, complexity, time, costs, and multistakeholder collaboration pose notable challenges to swift and full implementation. However, momentum in tackling gender data challenges is unlikely to build without awareness and a sense of urgency from regulators. In this sense, the pandemic and its aftermath presents an opportunity to prioritize these issues and take action.

Beyond the immediate need for evidence-based policymaking in crisis response, sex-disaggregated data is important for recovery efforts and building a more inclusive and resilient financial sector. It also serves as a critical input in demonstrating the business case for women’s financial inclusion. In a survey, AFI members identified “showing the business case” as one of the most important among a long list of policy options to advance GIF after the crisis.

For more about gender data in action:

- A WFID webinar on the “Importance of Gender Data for Women’s Financial Inclusion”
- AFI offers several relevant knowledge products: a Guideline Note on Sex-Disaggregated Data Report Templates, a Sex-Disaggregated Data Toolkit, and a Guideline Note on Leveraging Sex-Disaggregated Data to Accelerate Progress towards Women’s Financial Inclusion
- AFI’s case study on the experience of the Central Bank of Egypt covers practical aspects of its ground-breaking Financial Inclusion Data Hub while further upcoming AFI studies on Egypt will provide additional insight into its gender data practices
- WFID published Gender Data Diagnostics which illustrates the baseline in six countries and together with a Synthesis Brief provides an idea of the who and how
- Case studies on how Rwanda, Mexico, Zambia, and Chile have put gender data to work for GIF can be found by selecting “case studies” as type in the Data2X resource center
- Analyses on why women constitute an attractive target segment was conducted by the Financial Alliance for Women and the IFC’s Banking on Women program.
AFI members can also stimulate the competitive ambitions of FSPs by publishing industry average and top (anonymized) performance indicators on the women’s market and GIF KPIs annually, such as the number of accounts opened, total transactions or transaction growth rates, customer growth rates, NPL rates, average number of products held, lending to women entrepreneurs, and default rates by gender. Such publication of KPI data can compel the management of FSPs to rethink their approach to the women’s market and strive for greater achievements. This active use of data for feedback to market participants remains rare even among countries that are leading in terms of supply-side data collection.

Finally, the most effective catalyst for market participants in promoting GIF is enabling the market entry and scaling-up of providers interested in or committed to inclusive finance. As indicated in the Special Report on COVID-19 crisis response with a gender lens,65 countries with a level playing field for a wide range of providers have emerged as the clear leaders in boosting financial inclusion, leveraging the opportunities presented by DFS.

FROM SHOWING TO ENABLING THE GIF BUSINESS CASE

To build momentum for GIF, AFI members increasingly understand the relevance of showing the business case,66 which involves highlighting the monetary incentives that await successful financiers of women and women entrepreneurs.

Further demand-side research is necessary to properly estimate the size of the addressable market for these two segments, ideally reflecting the revenue potential from currently unserved and under-served women and (M)SMEs.

AFI members can also help in making this commercial opportunity more accessible to FSPs by enabling regulations in a post-crisis context. Such policy interventions may include:

---

65 Available at: https://issuu.com/afi-global/docs/closing_the_financial_inclusion_gender_gap_during?fr=sYWE3MUxNlASOT
66 As mentioned previously, this policy option received high scores most often for its relevance in advancing GIF after the crisis in a survey of AFI members conducted in November and December 2021.
LEVERAGING G2P initiatives to create more inclusive revenue models for FSPs. For instance, beneficial rebates for unserved and underserved women (e.g. on low value transactions and any fees for account maintenance) could be compensated by revenues from government agencies for FSPs handling the related disbursals to accounts or wallets, and any remaining cash payouts.

ORGANIZING and subsidizing sector-wide campaigns to mobilize deposits, thereby structurally reducing funding costs for deposit-taking lenders, with women as a key target segment due to their reputation as “better savers”.67

REDUCING risk capital requirements68 for loans to women, either across the board or within risk classes or risk scoring models, to make lending to women more profitable - provided that national data also validates women as “better repayers”.69

EXPLORING the possibility of improving regulations concerning the active sales of financial services and product bundling, taking account of pragmatic consumer protection considerations to allow FSPs to benefit from the higher likelihood of women responding to cross-selling.70

FACILITATING the emergence of (micro-) insurance offers that boost women’s risk coping mechanisms71 and aligns with their efforts to protect their families.

However, revenue potential is not the only fact to consider. Particularly among many low-income clients - which are predominately women - controlling costs is a major component of their economic viability as a client segment. This starts with client acquisitions, as every additional cost incurred by a provider to acquire a (female) client poses a risk of commercially excluding substantial portions of the market.

To enhance financial inclusion during and after crises by structurally improving cost factors, a gender lens policy for AFI members should include:

MAKING simplified KYC the first priority. While the push for electronic KYC is important, adopting tiered or simplified KYC may be more effective in the short-term, as setting up electronic KYC requires time and investments, while the added certainty in identifying low-income and low-volume clients is not of particular value in terms of AML/CFT.

EXPANDING the scope of who is allowed to acquire and register clients and where this can take place (i.e. going beyond full-time bank staff in bank branches) - digital self-service onboarding may not be suitable for all unbanked women given their limitations in mobile device ownership, affordable and reliable (data) connectivity, and digital literacy.

ENSURING interoperability72 to prevent new providers from facing the need to build-up a critical mass of users, for example, dealing with the challenges of “network effects” that are inherent in payments use cases.

GENERATING or facilitating opportunities to acquire new (women) clients “in bulk” through G2P or wage digitization initiatives.

SEEKING synergies through sector-wide initiatives, such as joint public-private financial education and sign-up campaigns on International Women’s Day (March 8) and beyond.

FACILITATING structurally lower operational expenditures, such as through more flexible regulations on requirements for branches and by permitting certified international providers to offer cloud-computing and Software-as-a-Service (SAAS) core banking and client data solutions, enabling scalable and low-cost operating models.

While these policies to enhance revenue opportunities and control costs will benefit the viability of any mass market client, women’s financial inclusion stands to gain particularly from such gender lens-derived insights.

---

67 Please see: https://financialallianceforwomen.org/the-opportunity/
68 Please see: https://www.findevgateway.org/es/finequity-aic/blog/2021/10/hacia-el-cierre-de-las-brechas-de-genero-en-mexico-traves-del-mayor-acceso-al-credito
69 Please see: https://financialallianceforwomen.org/the-opportunity/
70 Please see: https://financialallianceforwomen.org/library/?q=female-economy&search%5Bpublish_date%5D=&search%5Bupdate_date%5D=&search%5Border_by%5D=&search%5Border%5D=ASC
71 Please see: https://www.ifc.org/en/home
72 Please see: https://www.ifc.org/en/home
Women will not immediately transition the full set of their previous informal financial practices into the formal system. Acquiring them as clients (e.g. through a DFS-enabled G2P program) is just the beginning of such a transition. Improved financial education is likely to facilitate and ensure the successful transition of women into formal financial services.

Practical financial education campaigns that promote digital and financial literacy relevant to everyday use are critical, especially for women. Moreover, since the content is not specific to a single financial service provider, FSPs are well-positioned to initiate sector-wide, cost-shared efforts for nationwide campaigns while being ready with dedicated concepts to onboard new clients and manage service-related issues.

CoNSUMER PRotECtioN to SAFEGUARD ADoPtioN AND USAGE

COVID-19 rapidly introduced a new group of consumers into the market for formal financial services, which, while beneficial for financial inclusion, has also seen the pace of adoption often surpassing consumer protection measures.

As a result, both new and existing users have become vulnerable to predatory business practices and cyber risks. Negative user experiences or breaches of trust spread quickly through word-of-mouth among low-income clients who are likely to revert back to cash, undermining the acceptance of DFS.

The inclusion of many users, especially women, who have not previously experienced formal financial services and DFS requires a collaborative approach between FSPs and regulators to prevent a regression in the progress made in including these users. Challenges related to digital and financial literacy further exacerbates the issue as highlighted in the previous section. Therefore, building and communicating sound consumer protection laws, dispute settlement mechanisms, and introducing

PREPARING CLIENTS FOR EFFECTIVE INCLUSION: FINANCIAL EDUCATION AND DIGITAL LITERACY

Financial and digital literacy are critical to women’s financial inclusion, and data shows that gender gaps in both make women less likely to use financial services and more susceptible to fraud.

Various research studies, including the S&P Global Financial Literacy Survey, have shown that even in developed countries, men exhibit higher levels of financial literacy, experience less financial anxiety, and are better able to navigate financial markets. Worldwide, this gender gap stands at five percent, but it is often much wider in developing markets.

However, only 22 percent of respondents reported having a financial literacy strategy in place with an explicit focus on women. For women, the current gaps in knowledge and trust in their own skills translates into lower uptake of DFS and increased vulnerability to fraud.

Financial literacy is, therefore, critical because it determines whether: a) women approach formal FSPs for financial services or understand the offering when approached by an FSP; b) women feel confident enough to make informed decisions about products or services; and c) they engage in transactions when deciding to use a product or service.

In terms of leveraging a gender lens during a crisis response for financial inclusion, financial and digital literacy initiatives act as an essential force-multiplier.

75% Gaps in financial literacy are well-known as a key barrier for women’s financial inclusion, with 75 percent of respondents in an AFI Working Group survey identifying it as a key barrier.

However, only 22 percent of respondents reported having a financial literacy strategy in place with an explicit focus on women. For women, the current gaps in knowledge and trust in their own skills translates into lower uptake of DFS and increased vulnerability to fraud.

Financial literacy is, therefore, critical because it determines whether: a) women approach formal FSPs for financial services or understand the offering when approached by an FSP; b) women feel confident enough to make informed decisions about products or services; and c) they engage in transactions when deciding to use a product or service.

In terms of leveraging a gender lens during a crisis response for financial inclusion, financial and digital literacy initiatives act as an essential force-multiplier.

73 Available at: https://gfiec.org/initiatives/sp-global-finlit-survey/


76 if sector-wide cooperation is challenging to achieve, cooperation by a few FSPs can be effective. Weaving practical financial literacy lessons and calls-to-action into Kenya’s most popular soap opera proved highly effective for the three FSPs involved (Women’s World Banking 2017): How a Popular TV Show Shifted Social Norms Around Women’s Banking Habits in Kenya. Available at: www.womensworldbanking.org

77 Microlender Letshego reported, for instance, on its “digital eagles” campaign of sending ambassadors to groups of clients (e.g. at companies) and assisting them with digital channel use (Stakeholder Interview - Letshego 2021).
Promote institutional learning:

- Engaging in relevant sectoral forums and peer learning, such as AFI’s Gender Inclusive Finance Committee and regional forums (e.g. G20, GPFi, and BIS).
- Conducting capacity building for staff to understand the importance of using a gender lens in financial sector development, ideally extended to other relevant public sector stakeholders, such as national development banks and finance ministries.


Roughly one-third of AFI members have incorporated GIF and specific objectives into their strategies. Their examples should be followed in three key phases:

### PHASE 1: PRE-FORMULATION

Establish institutional structure, ensuring political support and stakeholder commitment, and conduct assessments of the financial inclusion landscape

- Identify the key institution(s) to assume political leadership, lead the NFIS and set up a governance framework, ideally with a gender balance
- Develop a concept note outlining the rationale for the NFIS, key issues to be addressed, and key policy areas; ensure it includes an implementation plan, monitoring and evaluation framework
- Diagnose the current situation to obtain a comprehensive baseline of the financial inclusion landscape along with current barriers and opportunities with a dedicated look at women; undertake peer learning visits where possible; collect and analyze sex-disaggregated data to understand the unique needs and barriers women face to accessing financial services; and meet with stakeholders in the market to dive deeper on key topics

### MAINSTREAMING THE GENDER LENS INTO INSTITUTIONAL PRACTICE

Given the demonstrated importance of GIF in achieving a more impactful crisis response and its potential contribution to future resilience and development outcomes for women, it is essential for the gender lens to become a central feature of AFI member policies.

Institutionalizing this approach will require:

**Visible commitment by the organization’s leadership:**

- Embedding GIF and its principles in internal communications.
- Designating a top-level “Ambassador” to champion and represent this cause.
- Reviewing and revising the organization’s internal efforts at gender equity in corporate culture, hiring, promotions, compatibility with family life, and careers.

**RESOURCES**

- Policy Model on Consumer Protection in Digital Financial Services  
- Guideline Note on Financial Consumer Protection During a Crisis  
- Complaint Handling in the Central Bank Toolkit

声のセキュリティに関する対策と規制は、両者に対しく際して重要である。

AFIは、パンデミックの背景での DFSの役割を高く評価し、デジタル金融サービスと消費者保護の関連性を強調しています。この認識は、消費者保護に対するポリシーの整備を反映しています。

### PHASE 1: PRE-FORMULATION

体制構築を確立し、政策と法を導入し、関連機関との協議を実施するためのフレームワークを構築

- 要務を担当する組織のリーダーシップを明確に
- 内部でのGIFの包括と原則を導入
- 上級パーソン“アンバサダー”を指名し、これを推進する
- 内部での性差別の取り組みをレビューし、これを再構築する

### MAINSTREAMING THE GENDER LENS INTO INSTITUTIONAL PRACTICE

GIFが、より効果的な危機対応に寄与し、将来の持続可能性と発展成果を増進する可能性があることを示しており、AFIの各政策においてGIFの役割が中心的な要素として無ければならない。

このアプローチを実現するには、以下のことが必要です:

**明確な組織リーダーシップの承認:**

- GIFとその原則を導入
- 上級の“アンバサダー”を指名し、これを推進する
- 内部での性差別包括体制のレビューと再構築

**リソース**

- ポリシー:デジタル金融サービスの消費者保護モデル
- ガイドライン:財務消費者保護の間の危機
- 投訴ハンドリングの中央銀行ツールキット

**RESOURCES**

- Policy Model on Consumer Protection in Digital Financial Services  
- Guideline Note on Financial Consumer Protection During a Crisis  
- Complaint Handling in the Central Bank Toolkit

声のセキュリティに関する対策と規制は、両者に対しく際して重要である。

AFIは、パンデミックの背景での DFSの役割を高く評価し、デジタル金融サービスと消費者保護の関連性を強調しています。この認識は、消費者保護に対するポリシーの整備を反映しています。

### PHASE 1: PRE-FORMULATION

体制構築を確立し、政策と法を導入し、関連機関との協議を実施するためのフレームワークを構築

- 要務を担当する組織のリーダーシップを明確に
- 内部でのGIFの包括と原則を導入
- 上級の“アンバサダー”を指名し、これを推進する
- 内部での性差別包括体制のレビューと再構築

### MAINSTREAMING THE GENDER LENS INTO INSTITUTIONAL PRACTICE

GIFが、より効果的な危機対応に寄与し、将来の持続可能性と発展成果を増進する可能性があることを示しており、AFIの各政策においてGIFの役割が中心的な要素として無ければならない。

このアプローチを実現するには、以下のことが必要です:

**明確な組織リーダーシップの承認:**

- GIFとその原則を導入
- 上級の“アンバサダー”を指名し、これを推進する
- 内部での性差別包括体制のレビューと再構築

**RESOURCES**

- Policy Model on Consumer Protection in Digital Financial Services  
- Guideline Note on Financial Consumer Protection During a Crisis  
- Complaint Handling in the Central Bank Toolkit

声のセキュリティに関する対策と規制は、両者に対しく際して重要である。

AFIは、パンデミックの背景での DFSの役割を高く評価し、デジタル金融サービスと消費者保護の関連性を強調しています。この認識は、消費者保護に対するポリシーの整備を反映しています。

### PHASE 1: PRE-FORMULATION

体制構築を確立し、政策と法を導入し、関連機関との協議を実施するためのフレームワークを構築

- 要務を担当する組織のリーダーシップを明確に
- 内部でのGIFの包括と原則を導入
- 上級の“アンバサダー”を指名し、これを推進する
- 内部での性差別包括体制のレビューと再構築

### MAINSTREAMING THE GENDER LENS INTO INSTITUTIONAL PRACTICE

GIFが、より効果的な危機対応に寄与し、将来の持続可能性と発展成果を増進する可能性があることを示しており、AFIの各政策においてGIFの役割が中心的な要素として無ければならない。

このアプローチを実現するには、以下のことが必要です:

**明確な組織リーダーシップの承認:**

- GIFとその原則を導入
- 上級の“アンバサダー”を指名し、これを推進する
- 内部での性差別包括体制のレビューと再構築

**RESOURCES**

- Policy Model on Consumer Protection in Digital Financial Services  
- Guideline Note on Financial Consumer Protection During a Crisis  
- Complaint Handling in the Central Bank Toolkit

声のセキュリティに関する対策と規制は、両者に対しく際して重要である。

AFIは、パンデミックの背景での DFSの役割を高く評価し、デジタル金融サービスと消費者保護の関連性を強調しています。この認識は、消費者保護に対するポリシーの整備を反映しています。

### PHASE 1: PRE-FORMULATION

体制構築を確立し、政策と法を導入し、関連機関との協議を実施するためのフレームワークを構築

- 要務を担当する組織のリーダーシップを明確に
- 内部でのGIFの包括と原則を導入
- 上級の“アンバサダー”を指名し、これを推進する
- 内部での性差別包括体制のレビューと再構築

### MAINSTREAMING THE GENDER LENS INTO INSTITUTIONAL PRACTICE

GIFが、より効果的な危機対応に寄与し、将来の持続可能性と発展成果を増進する可能性があることを示しており、AFIの各政策においてGIFの役割が中心的な要素として無ければならない。

このアプローチを実現するには、以下のことが必要です:

**明確な組織リーダーシップの承認:**

- GIFとその原則を導入
- 上級の“アンバサダー”を指名し、これを推進する
- 内部での性差別包括体制のレビューと再構築

**RESOURCES**

- Policy Model on Consumer Protection in Digital Financial Services  
- Guideline Note on Financial Consumer Protection During a Crisis  
- Complaint Handling in the Central Bank Toolkit
**Phase 2: Formulation**

Develop a comprehensive document defining the vision, key policies, and implementation plan to meet the overarching goals of the NFIS along with a monitoring and evaluation framework.

- **Identify a vision and mission** for the NFIS emphasizing GIF
- **Include GIF policies** based on diagnostic findings from Phase 1
- **Develop gender-S.M.A.R.T. measures and targets** that are specific, measurable, attainable, relevant, and time-bound
- **Draft a GIF implementation plan with an action plan or roadmap** along with gender-specific actions and targets mapped to objectives, ranked, and mapped to relevant stakeholders along with a timeframe and key performance indicators
- **Create a communications strategy** with a GIF focus, including both internal and external strategies, activities, schedules, and targets
- **Develop a gender-sensitive monitoring and evaluation framework** outlining the purpose, scope, methodology, and evaluators responsible for determining progress against targets, objectives, and goals of the strategy in the market to dive deeper on key topics

**Phase 3: Implementation**

Effective implementation of GIF policy interventions outlined in the NFIS.

- **Ensure the governance structure is well-staffed**, adequately resourced, gender-balanced, and well set up to implement, monitor, and evaluate progress against the NFIS
- **Monitor progress** by collecting, analyzing, and reviewing information related to policy interventions; ensure this data is sex-disaggregated
- **Conduct mid-term and post-implementation evaluations** to understand progress, course correct where needed, and inform future strategies
In light of the experience gained during the COVID-19 pandemic and the effective responses of AFI members and policymakers in ways that preserved and promoted women’s financial inclusion and resilience, there are several key elements that should be reflected in the revision of financial sector development and inclusion strategies with a gender lens.

In the following pages, we highlight the noteworthy efforts of two AFI members, showcasing their proactive response in addressing the crisis by strategically utilizing several building blocks as mentioned in the section titled “A Gender Lens and Gender Inclusive Crisis Response”.

LEARNING FROM THE PAST EXPERIENCES OF AFI MEMBERS ON GENDER INCLUSIVE CRISIS RESPONSES “BY DESIGN”

INTRODUCING RAPID EMERGENCY DFS AND GIF-BASED CASH TRANSFERS FOR VULNERABLE POPULATIONS - PARAGUAY

Within weeks of the pandemic, Paraguay introduced the Pytyvo program to provide emergency cash transfers to individuals working in the informal sector, self-employed workers, and those employed in small and medium-sized enterprises, primarily women. Those receiving other state benefits were ineligible. The program provided two cash transfers with the possibility of another two if funds permitted. Additionally, the Ministry of Social Development’s Tekopora conditional cash transfer program for households in extreme poverty and poverty transitioned to a digital platform using WhatsApp messages to continue its training and visits by family guides to support and follow up with families in the program.

✓ USING UNCONVENTIONAL DATA SOURCES IN A CRISIS TO TARGET AFFECTED OR ELIGIBLE CITIZENS

In the absence of specific data on informal sector or self-employed workers, the government used national identity (ID) cards for registration. Beneficiaries were further identified and verified using police records, lists of government employees, and data from existing social assistance programs. At the time of registration, additional data was collected to ensure that only two members of each eligible household received payments. The World Bank’s High Frequency Phone Survey showed that an estimated 85 percent recipients of Pytyvo were not receiving other benefits. Despite the lack of a centralized database at the start of the pandemic of recipients of state benefits and potentially eligible beneficiaries, the target rate was exceptionally high and accurate.

✓ USE OF DIGITAL FINANCIAL SERVICES (MOBILE PAYMENTS)

Registration was conducted through the Ministry of Finance website or a mobile app. By collaborating with existing electronic payment or DFS providers, payments could be credited to electronic wallets, bank accounts, and a new digital system that enabled payments to be received and purchases made using national ID cards. According to the World Bank, 90 percent of beneficiaries in the first Pytyvo scheme received payments into electronic wallets, 10 percent used the national ID-enabled payment system, and less than one percent had the funds deposited into their bank accounts.

✓ INNOVATIVE MANAGEMENT OF THE IT SYSTEM LOAD

Registrations were staggered based on the last two digits of registrants’ ID numbers. For example, registrants with ID numbers starting with 0 and 1 were invited to register on the first day, those ending with 2 and 3 on the next day, and so forth. This innovative approach prevented a system crash during the first few days of the emergency scheme, avoiding any overloading of the government and mobile phone providers’ IT infrastructure.
WhatsApp Messaging for Continued Social and Development Assistance

Tekopora te Acompañía was launched to continue the training and education provided by family guides for groups within the Tekopora conditional cash transfer program. According to a survey conducted by Fundación Capital, which involved 400 family guides and field coordinators, 74 percent of Tekopora recipient families reported being aware of the campaign and having received the messages; 92 percent felt it was necessary and useful enabling them to cope with the pandemic situation; 80 percent of recipients forwarded the messages to their families, neighbors, and friends via WhatsApp groups; with all surveyed families expressing that they learned something new and applied the advice received into practice.

Gender Lens in the Tekopora Program

Tekopora targets pregnant women, widowed parents, the elderly, children up to 18 years old, individuals with disabilities, and indigenous families. The program’s targeted demographics prioritize supporting households where women bear increased burdens and household responsibilities, along with other vulnerable populations. During the pandemic, transitioning to a WhatsApp-based messaging model directly supported women by providing continued training and guidance.

References:


Fundación Capital. 2021. Campaign in Paraguay


Respective Building Blocks Covered

1. The Role of the Financial Regulator in a GIF Response
   - Act as a key enabler for GIF, incl. technology and infrastructure

2. Human-Centered Design (HCD) Lens
   - Apply gender lens as a part of HCD in policy development

3. Digital Financial Services
   - Incorporate digital finance solutions as a crisis response policy

4. Leveraging Existing G2P & Conditional Cash Transfer Programs
   - Make use of existing programs (esp. female-targeted)

5. Targeting Women-Led Businesses
   - Include women-led businesses in crisis response policies

6. Combining Climate Change & Sustainability with GIF Policies
   - Leverage sustainable finance (e.g. green finance)
The toolbox of AFI members may be limited by their institutional mandate.

In the years leading up to the pandemic, conventional monetary policies had already shown their limitations, particularly in the context of ultra-low or negative interest rates. During crises that result in more rapid and sharper disruptions, delays in implementing and effectively applying central bank policies further compound the challenges. In addition, areas of policy intervention that fall under the responsibility of other actors become particularly important in ensuring a soft economic landing and cushioning the impact of crisis responses. Tools need to be coordinated between AFI members and other government bodies to support the economy. Therefore, greater preparedness and new collaborative practices beyond institutional boundaries and the public sector are necessary.

During all three speeds of a crisis response, there are likely to be three distinct purposes for coordinating and collaborating with national and international stakeholders:

**SOURCING EXPERTISE**

1. **In the absence of demand-side data, stakeholders can act as a “voice of women” (or sub-segments, thereof, as well as for intersectional vulnerable groups or populations) in a policy dialogue process. They can provide expert opinions to make policy design as gender inclusive and human-centered as possible in all three speeds of the crisis response.**

2. **International donors may be able to deploy financial assistance beyond local fiscal constraints when a dedicated gender angle or one in which women present aspects of intersectionality (e.g. youth, the elderly, the disabled, rural residents, forcibly displaced populations) characterizes the planned interventions.**

3. **Stakeholders are likely to have privileged access to pre-existing networks related to women, and particularly vulnerable sub-segments of women. When targeting beneficiaries in the informal economy and outside of the formal financial sector, this reach is important to communicate and mobilize interest for interventions, ensure that rumors are avoided, and assist in the timely onboarding of target populations to programs and (digital) financial services.**

After a decade of rising public debt levels in many developing countries, fiscal resources are becoming scarce, especially when crises reduce risk appetite for emerging market debt. Therefore, the circle of stakeholders for financial assistance in crisis response should include international donors, who are particularly focused on DFS, GIF, and Green Finance policy responses and designs.
The degree to which financial sector regulators and supervisors actively engage and coordinate with FSPs on issues of financial inclusion varies widely. However, for an effective gender lens crisis response, close engagement becomes a priority. A crisis like the pandemic is a time of immense uncertainty for financial institutions and is likely to result in a rapidly diminished risk appetite with management attention focused on consolidating the quality of the loan portfolio - and thereby, pro-cyclically exacerbating the effects of the crisis. Furthermore, GIF remains a comparatively new topic with limited expertise among most FSPs, from commercial banks to FinTechs. Additionally, given the importance of digital service channels in many crisis responses, it is especially important to include key providers in this space (mobile money providers, FinTechs, payments service banks, super apps and platforms, etc.) in any coordination with FSPs.

In cases where such coordination mechanisms do not yet exist, they should be established as a matter of urgency - and maintained even after a crisis subsides, since effective collaboration under stress is best cultivated through established communication habits across different organizational levels and based on trust.

According to the experience of AFI members during the pandemic, close collaboration with financial service providers, mediated through sectoral associations, was identified as the most relevant aspect (see figure below). Other stakeholders in the financial sector followed in order of importance - in line with the traditional mandate of AFI members. Stakeholders more closely engaged with issues relating to women’s inclusion, empowerment, and assistance did not receive a similar level of attention.

The gender lens crisis response requires strengthening any existing or new collaborative arrangements with stakeholders who represent the interests and expertise of women or gender inclusivity. These stakeholders may exist outside of AFI, government ministries, and public bodies - including those in the private sector and civil society that AFI members may not have relationships with or even be aware of. Therefore, both during a crisis (Speed 1 - Fast-Paced “Fire-fighting” phase) and before a crisis occurs, AFI members need to take the lead in creating a comprehensive gender inclusive stakeholder map that covers the entire nation and economy. This map can then be effectively deployed as part of a crisis response.

---

**FIGURE: ASSESSMENT OF THE RELEVANCE OF INSTITUTIONAL COLLABORATION WITH VARIOUS STAKEHOLDERS BY AFI MEMBERS DURING THE COVID-19 PANDEMIC**

<table>
<thead>
<tr>
<th>Stakeholders</th>
<th>Relevance</th>
</tr>
</thead>
<tbody>
<tr>
<td>International, multilateral donors (e.g. IMF, World Bank, IFC, EBRD, AfDB, IDB, etc.)</td>
<td>3.25</td>
</tr>
<tr>
<td>AFI</td>
<td>3.36</td>
</tr>
<tr>
<td>Other international formats for collaboration with regulators (BIS, Financial Action Task Force)</td>
<td>3.33</td>
</tr>
<tr>
<td>Financial sector regulators covering other types of providers</td>
<td>3.55</td>
</tr>
<tr>
<td>Ministry of Finance / Ministry of Economic Affairs or similar</td>
<td>3.45</td>
</tr>
<tr>
<td>Ministry of Social Affairs or similar</td>
<td>3.35</td>
</tr>
<tr>
<td>Ministry of Women / Gender Equality or similar</td>
<td>3.06</td>
</tr>
<tr>
<td>Other government entities</td>
<td>3.61</td>
</tr>
<tr>
<td>Financial sector associations (e.g. of commercial banks, microfinance institutions, etc.)</td>
<td>3.71</td>
</tr>
<tr>
<td>Other civil society / private sector associations</td>
<td>3.30</td>
</tr>
</tbody>
</table>

Source: online survey of 30 AFI members, November 2021 to January 2022

1 = NOT AT ALL RELEVANT > 5 = VERY RELEVANT

---

82 See BIS: https://www.bis.org/publ/work931.htm as well as the Financial Alliance for Women: https://financialallianceforwomen.org/download/how-fintechs-can-capture-the-female-economy/
Policymakers can benefit from the existing strategies, frameworks, and experiences in serving women that were implemented by other public sector and civil society actors to enhance their own expertise and the networks necessary to facilitate and effectively apply a gender lens to policymaking during crises and beyond.

The toolkit provides a step-by-step process to creating and maintaining such a gender inclusive stakeholder map and contact list. It should be used along with:

- Guideline Note on Effective Stakeholder Coordination for National Financial Inclusion Strategy Implementation
- Mitigating The Impact of Pandemic Crises on National Financial Inclusion Strategies (NFIS) Policy Note

<table>
<thead>
<tr>
<th>STEP 1: MAP STAKEHOLDERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify actors in the public sector and civil society that reach women with products or services, associations or organizations that serve concentrations of women in society, and agencies tasked with preserving or promoting the rights of women.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>STEP 2: CONDUCT OUTREACH</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop messaging to explain the objective of working together, identify appropriate online and offline channels to share this messaging, and share it with identified stakeholders, along with proposed activities and a timeline for next steps.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>STEP 3: DESIGNATE LIAISONS AND IDENTIFY COUNTERPARTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Determine which representatives from which organizations will be responsible for facilitating, monitoring, and following up on the designated activities.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>STEP 4: CREATE A CRISIS OR EMERGENCY CONTACT LIST</th>
</tr>
</thead>
<tbody>
<tr>
<td>A crisis contact list should include a directory of individuals by organization and their work, home and mobile (out of hours) phone numbers. This list should undergo a crisis contact phone test outside of working hours every six months to ensure that all stakeholders are current and phone numbers are correct. Any unanswered or unreceived calls should prompt the updating of the list with new stakeholders or updated contact information. This list must be carried by all individuals identified as crisis response team members.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>STEP 5: ESTABLISH FORMATS FOR FIT-FOR-PURPOSE COLLABORATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Faster-paced rapid response and recovery could involve task forces with a gender balanced representation empowered to actively drive the design process and deployment of interventions. More deliberative working groups may be appropriate for longer-term structural efforts (and possibly feeding into an NFIS), which would also be tasked with the role of supervising policy implementation.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>STEP 6: BUILD OUT A SHARED VISION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mobilize the expertise of stakeholders to benefit policy design making it more aware of and responsive to the needs and constraints of target groups. Leverage such insights for gender lens-informed strategies so they reflect a shared vision and can thereby be more effective in deployment.</td>
</tr>
</tbody>
</table>

---

84 Available at: https://www.afi-global.org/wp-content/uploads/2021/04/FISNFSCOVID-graphic_AW2.pdf
COUNTRY CONTEXT ANALYSIS AND BENCHMARKING

The AFI Benchmarking Tool on the Enabling Context for Gender Inclusive Finance (refer to the separately provided Excel tool) comprehensively addresses the crucial components associated with these aspects.

Although we recommend obtaining supply side data through requests to central banks and global databases, as well as collecting data from the demand side through surveys, to build out a structurally improved evidence base for policy design, the AFI Benchmarking Tool serves as a reliable first glance at a country’s GIF context to start taking gender-lens action without delay.

AFI BENCHMARKING TOOL ON THE ENABLING CONTEXT FOR GENDER INCLUSIVE FINANCE

For AFI members with limited previous GIF experience, the first step in conducting a country-level gender lens diagnosis can be challenging. To address this, AFI provides an Excel-based tool as part of this policy toolkit to assess the context and baseline necessary for embedding crisis response, recovery support, and broader financial inclusion policies for AFI members and other stakeholders.

The objective is to facilitate AFI members in immediately launching their considerations and more specific planning without delay by providing an overview of key factors shaping GIF and contextualizing their own country’s performance through a scoring system against five selected peer countries. Users have the freedom to choose their peers based on geographic proximity or similar development stages (e.g. based on GNI per capita in purchasing power terms), which would provide the most relevant comparisons.

Thus, the AFI benchmarking tool allows AFI members to quickly identify the specific challenges their country faces, learn from peer countries that have made progress under similar circumstances, and leverage comparative strengths to advance more rapidly. As the tool covers many areas that are typically beyond the scope of AFI members, it can also help identify particular gaps that require collaboration with competent authorities.

By providing the context of peer countries, the tool aims to encourage AFI members to seize opportunities and learn from pioneers in developing countries that have made strides in promoting women’s financial inclusion, despite persistent structural challenges such as poverty, illiteracy, low labor force participation, and restrictive sociocultural norms. As countries like India and Kenya have shown, AFI members can make significant progress toward financial inclusion without having to wait for other players in the field of women’s financial inclusion.
### AFI Benchmarking Tool on the Enabling Context for Gender Inclusive Finance (Cont.)

#### Main Indicators

<table>
<thead>
<tr>
<th>COUNTRY</th>
<th>PEER 1</th>
<th>PEER 2</th>
<th>PEER 3</th>
<th>PEER 3</th>
<th>PEER 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population total</td>
<td>14,645,468</td>
<td>81,835,124</td>
<td>31,825,295</td>
<td>58,558,270</td>
<td>270,625,568</td>
</tr>
<tr>
<td>GNI per capita (PPP)</td>
<td>3,262</td>
<td>9,046</td>
<td>5,735</td>
<td>11,246</td>
<td>11,142</td>
</tr>
<tr>
<td>HDI Score</td>
<td>0.57</td>
<td>0.69</td>
<td>0.58</td>
<td>0.71</td>
<td>0.72</td>
</tr>
<tr>
<td>Urban population (% of total population)</td>
<td>32%</td>
<td>64%</td>
<td>66%</td>
<td>67%</td>
<td>56%</td>
</tr>
<tr>
<td>Life Expectancy</td>
<td>61.20</td>
<td>70</td>
<td>60.78</td>
<td>63.86</td>
<td>71.51</td>
</tr>
</tbody>
</table>

#### Scores

<table>
<thead>
<tr>
<th>COUNTRY</th>
<th>PEER 1</th>
<th>PEER 2</th>
<th>PEER 3</th>
<th>PEER 3</th>
<th>PEER 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>A: Enabling Environment</td>
<td>0.64</td>
<td>0.59</td>
<td>0.88</td>
<td>0.84</td>
<td>0.87</td>
</tr>
<tr>
<td>A0 Key factors</td>
<td>0.35</td>
<td>0.71</td>
<td>0.74</td>
<td>1.00</td>
<td>0.49</td>
</tr>
<tr>
<td>A1 Stage of Economic Development</td>
<td>0.69</td>
<td>0.60</td>
<td>0.74</td>
<td>0.93</td>
<td>0.83</td>
</tr>
<tr>
<td>A2 Stage of Social Development</td>
<td>0.75</td>
<td>0.67</td>
<td>0.94</td>
<td>0.81</td>
<td>0.83</td>
</tr>
<tr>
<td>A3 Digital</td>
<td>0.48</td>
<td>0.49</td>
<td>0.95</td>
<td>0.70</td>
<td>0.94</td>
</tr>
<tr>
<td>B: Women’s Inclusion - Women’s human capital</td>
<td>0.82</td>
<td>0.80</td>
<td>0.92</td>
<td>0.70</td>
<td>0.68</td>
</tr>
<tr>
<td>B1 Legal &amp; Social context</td>
<td>0.91</td>
<td>0.91</td>
<td>0.99</td>
<td>0.76</td>
<td>0.71</td>
</tr>
<tr>
<td>B2 Women Daily Lives etc.</td>
<td>0.71</td>
<td>0.66</td>
<td>0.89</td>
<td>0.75</td>
<td>0.79</td>
</tr>
<tr>
<td>B3 Economic Inclusion</td>
<td>0.85</td>
<td>0.82</td>
<td>0.88</td>
<td>0.60</td>
<td>0.53</td>
</tr>
<tr>
<td>C: Women’s Entrepreneurship</td>
<td>0.80</td>
<td>0.77</td>
<td>0.78</td>
<td>0.78</td>
<td>0.67</td>
</tr>
<tr>
<td>C1 General Context for Business</td>
<td>0.66</td>
<td>0.59</td>
<td>0.90</td>
<td>0.81</td>
<td>0.88</td>
</tr>
<tr>
<td>C2 Women Entrepreneurship Context</td>
<td>0.99</td>
<td>0.89</td>
<td>1.00</td>
<td>0.74</td>
<td>0.93</td>
</tr>
<tr>
<td>C3 The Practice of Women’s Entrepreneurship</td>
<td>0.75</td>
<td>0.84</td>
<td>0.45</td>
<td>0.79</td>
<td>0.19</td>
</tr>
<tr>
<td>D: Financial Sector</td>
<td>0.63</td>
<td>0.33</td>
<td>0.78</td>
<td>0.79</td>
<td>0.70</td>
</tr>
<tr>
<td>D1 Inclusivity - Overall</td>
<td>0.51</td>
<td>0.08</td>
<td>0.79</td>
<td>0.63</td>
<td>0.54</td>
</tr>
<tr>
<td>D2 Inclusivity - Women</td>
<td>0.64</td>
<td>0.81</td>
<td>0.96</td>
<td>0.33</td>
<td>0.51</td>
</tr>
<tr>
<td>D3 Inclusivity - Women in Business</td>
<td>0.95</td>
<td>0.86</td>
<td>0.90</td>
<td>0.98</td>
<td>0.95</td>
</tr>
<tr>
<td>D4 Capacity</td>
<td>0.57</td>
<td>0.39</td>
<td>0.72</td>
<td>0.50</td>
<td>0.72</td>
</tr>
<tr>
<td>D5 Regulation</td>
<td>0.47</td>
<td>0.68</td>
<td>0.89</td>
<td>0.94</td>
<td>0.94</td>
</tr>
</tbody>
</table>
### Population, Total

<table>
<thead>
<tr>
<th>Country</th>
<th>Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zimbabwe</td>
<td>14,643,468</td>
</tr>
<tr>
<td>Average</td>
<td>81,835,124</td>
</tr>
<tr>
<td>Angola</td>
<td>31,825,295</td>
</tr>
<tr>
<td>South Africa</td>
<td>58,558,270</td>
</tr>
<tr>
<td>Indonesia</td>
<td>36,471,769</td>
</tr>
<tr>
<td>Morocco</td>
<td>11,694,719</td>
</tr>
<tr>
<td>Tunisia</td>
<td>7,741,546</td>
</tr>
</tbody>
</table>

### HDI Score

<table>
<thead>
<tr>
<th>Country</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zimbabwe</td>
<td>0.57</td>
</tr>
<tr>
<td>Average</td>
<td>0.69</td>
</tr>
<tr>
<td>Angola</td>
<td>0.58</td>
</tr>
<tr>
<td>South Africa</td>
<td>0.71</td>
</tr>
<tr>
<td>Indonesia</td>
<td>0.72</td>
</tr>
<tr>
<td>Morocco</td>
<td>0.69</td>
</tr>
<tr>
<td>Tunisia</td>
<td>0.74</td>
</tr>
</tbody>
</table>

### Urban Population (% of total population)

<table>
<thead>
<tr>
<th>Country</th>
<th>Urban Pop.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zimbabwe</td>
<td>32%</td>
</tr>
<tr>
<td>Average</td>
<td>64%</td>
</tr>
<tr>
<td>Angola</td>
<td>66%</td>
</tr>
<tr>
<td>South Africa</td>
<td>67%</td>
</tr>
<tr>
<td>Indonesia</td>
<td>56%</td>
</tr>
<tr>
<td>Morocco</td>
<td>63%</td>
</tr>
<tr>
<td>Tunisia</td>
<td>69%</td>
</tr>
</tbody>
</table>

### Life Expectancy

<table>
<thead>
<tr>
<th>Country</th>
<th>Life Expectancy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zimbabwe</td>
<td>61.20</td>
</tr>
<tr>
<td>Average</td>
<td>70</td>
</tr>
<tr>
<td>Angola</td>
<td>60.78</td>
</tr>
<tr>
<td>South Africa</td>
<td>63.86</td>
</tr>
<tr>
<td>Indonesia</td>
<td>71.51</td>
</tr>
<tr>
<td>Morocco</td>
<td>76.45</td>
</tr>
<tr>
<td>Tunisia</td>
<td>76.51</td>
</tr>
</tbody>
</table>

### A: Enabling Environment

<table>
<thead>
<tr>
<th>Country</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zimbabwe</td>
<td>0.64</td>
</tr>
<tr>
<td>Angola</td>
<td>0.59</td>
</tr>
<tr>
<td>South Africa</td>
<td>0.88</td>
</tr>
<tr>
<td>Indonesia</td>
<td>0.84</td>
</tr>
<tr>
<td>Morocco</td>
<td>0.87</td>
</tr>
<tr>
<td>Tunisia</td>
<td>0.93</td>
</tr>
</tbody>
</table>

### B: Women’s Inclusion - Women’s Human Capital

<table>
<thead>
<tr>
<th>Country</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zimbabwe</td>
<td>0.82</td>
</tr>
<tr>
<td>Angola</td>
<td>0.80</td>
</tr>
<tr>
<td>South Africa</td>
<td>0.92</td>
</tr>
<tr>
<td>Indonesia</td>
<td>0.70</td>
</tr>
<tr>
<td>Morocco</td>
<td>0.68</td>
</tr>
<tr>
<td>Tunisia</td>
<td>0.71</td>
</tr>
</tbody>
</table>

### A: Enabling Environment

<table>
<thead>
<tr>
<th>Country</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zimbabwe</td>
<td>0.80</td>
</tr>
<tr>
<td>Angola</td>
<td>0.77</td>
</tr>
<tr>
<td>South Africa</td>
<td>0.78</td>
</tr>
<tr>
<td>Indonesia</td>
<td>0.78</td>
</tr>
<tr>
<td>Morocco</td>
<td>0.67</td>
</tr>
<tr>
<td>Tunisia</td>
<td>0.71</td>
</tr>
</tbody>
</table>

### B: Women’s Inclusion - Women’s Human Capital

<table>
<thead>
<tr>
<th>Country</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zimbabwe</td>
<td>0.63</td>
</tr>
<tr>
<td>Angola</td>
<td>0.33</td>
</tr>
<tr>
<td>South Africa</td>
<td>0.78</td>
</tr>
<tr>
<td>Indonesia</td>
<td>0.79</td>
</tr>
<tr>
<td>Morocco</td>
<td>0.70</td>
</tr>
<tr>
<td>Tunisia</td>
<td>0.66</td>
</tr>
</tbody>
</table>
For successful GIF crisis and post-crisis management, AFI members should consider the expansion of their evidence base on the enabling context of their respective countries. In looking ahead, the questions below indicate the type of information that can provide a better sense of the barriers to enhancing women’s financial inclusion, which gender-intentional or gender-transformational policies need to consider.

<table>
<thead>
<tr>
<th>Economic Participation</th>
<th>Socio-Cultural Norms &amp; Legal Restrictions</th>
<th>Financial Capability</th>
<th>Education &amp; Financial Literacy</th>
<th>Mobile, Internet &amp; Identity Documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>What are the hours of unpaid care work undertaken by women and men each day?</td>
<td>Are there legal restrictions on women in the workplace, the hours they can work and the jobs they can undertake?</td>
<td>What percentage of urban and rural women are formally/informally financially included?</td>
<td>What percentage of women have completed their primary, higher, and tertiary education?</td>
<td>What percentage of women have access to a mobile phone?</td>
</tr>
<tr>
<td>What is the overall labor force participation rates disaggregated by sex?</td>
<td>Can a woman still work in the same manner after marriage as she did before?</td>
<td>What percentage of women are active users of a formal or informal financial product or service?</td>
<td>What percentage of women are literate/literate/digitally literate?</td>
<td>What percentage of women have access to a feature phone/a smart phone?</td>
</tr>
<tr>
<td>What is the average female and male full-time income and the percentage of women and men in full time work?</td>
<td>Can a woman still work in the same manner after becoming a parent as she did before?</td>
<td>What percentage of women save?</td>
<td>What percentage of women are insured?</td>
<td>What percentage of women have a mobile money account?</td>
</tr>
<tr>
<td>What is the average female and male part-time income and the percentage of women and men in part-time work?</td>
<td>Are there legal restrictions on women’s ability to manage or own assets, or her ability to inherit assets?</td>
<td>What percentage of women have access to credit?</td>
<td>What percentage of women have a pension?</td>
<td>What percentage of women use the internet?</td>
</tr>
<tr>
<td>What percentage of informal businesses are owned by women?</td>
<td>Are there legal restrictions on women’s mobility outside of the home, can she travel freely, apply for a passport freely?</td>
<td>What percentage of women have access to credit?</td>
<td>What percentage of women have a pension?</td>
<td>If there is a national identity document what percentage of women have one? What percentage of women are able to use it if they have one?</td>
</tr>
<tr>
<td>What percentage of formal businesses are owned by women?</td>
<td>Are there legal restrictions on women’s marriage, where she lives after marriage and her ability to divorce and receive and relevant alimony or custody of her children?</td>
<td>What level of women save?</td>
<td>What percentage of women have a pension?</td>
<td></td>
</tr>
<tr>
<td>What percentage for informal women owned businesses have access to credit?</td>
<td>What levels of gender-based violence are reported by women and men?</td>
<td>What percentage of women have access to credit?</td>
<td>What percentage of women have a pension?</td>
<td></td>
</tr>
<tr>
<td>What percentage of formal businesses are owned by women?</td>
<td>Can a woman be the head of a household?</td>
<td>What percentage of women have access to credit?</td>
<td>What percentage of women have a pension?</td>
<td></td>
</tr>
<tr>
<td>What is the percentage for informal women owned businesses have access to credit?</td>
<td>Do women have decision making responsibilities inside or outside of the household?</td>
<td>What percentage of women have access to credit?</td>
<td>What percentage of women have a pension?</td>
<td></td>
</tr>
<tr>
<td>What is the rate of non-performing loans for women compared to men?</td>
<td></td>
<td>What percentage of women save?</td>
<td>What percentage of women have a pension?</td>
<td></td>
</tr>
<tr>
<td>What is the average female and male income from self-employment or entrepreneurship and the percentage of women and men who are self-employed or entrepreneurs?</td>
<td></td>
<td>What percentage of women have access to credit?</td>
<td>What percentage of women have a pension?</td>
<td></td>
</tr>
<tr>
<td>What is the average GNI per capital for women and men?</td>
<td></td>
<td>What percentage of women have access to credit?</td>
<td>What percentage of women have a pension?</td>
<td></td>
</tr>
</tbody>
</table>

- World Bank Database
- World Bank Enterprise Surveys
- UN Population Prospects
- IMF World Economic Outlook Database
- IMF World and Regional Economic Outlook Reports
- UN Human Development Report
- ILO Key Indicators of the Labor Market
- UN Time Use Surveys
- Women Business and the Law
- OECD Social Institutions & Gender Index (SIGI)
- World Economic Forum: Gender Gap Report
- UN Women
- Global Entrepreneurship Monitor, country or annual reports
- Global Findex
- IMF Financial Access Survey
- IFC Enterprise Finance Gap Database (2011)
- MSME Finance Gap (2017)
- MIX Market
- IMF Article IV Report
- FinScope Surveys
- World Bank Gender Data Portal
- UNESCO
- OECD Education
- S&P Global FinLit Survey
- FinScope Surveys
- IADB
- World Bank Database
- ID4D
- OECD
- ITU (Int Telecommunications Union)
- GSMA Mobile Money
IMPROVING DEMAND- AND SUPPLY-SIDE DATA COLLECTION RELATED TO THE FINANCIAL SECTOR

DEMAND-SIDE DATA COLLECTION

When collecting demand-side data through surveys or focus groups undertaken by AFI members, statistical offices, and other stakeholders, sex-disaggregation can be easily incorporated by including a question about the respondent’s sex as part of the questionnaire. Forty percent of responding AFI members had already undertaken dedicated GIF research before or during the pandemic, and another 40 percent were planning to do so, going forward.

Faster and more affordable methods, such as the rapid response surveys conducted by the World Bank with several African countries (including Ethiopia, Malawi, Nigeria, Tanzania, and Uganda) offer examples of demand-side data collection. Response panels or mobile surveys have become widespread, providing data on the evolving conditions, and FSPs as well as other stakeholders can assist AFI members in regularly deploying these methods to their clients and networks. In nearly all countries, mobile phone usage has become widespread, providing valuable insights into the prevailing conditions, and FSPs as well as other stakeholders can assist AFI members in regularly deploying these methods to their clients and networks. In nearly all countries, mobile phone usage has become so widespread that the downside of ignoring such opportunities certainly outweighs the risks of biased insights.

Building on broader demand-side research, tracker surveys that check-in with panels or cohorts as a smaller sub-set of previous respondents are another tool to map disruptions from crises and shifts in financial service usage. In Kenya, three waves of a MSME Covid-19 Tracker Survey, based on a sample of microbusinesses from the 2019 FinAccess survey, provided stakeholders with a clearer understanding of how businesses managed during the pandemic.

The common concerns regarding the cost and time-lags associated with demand-side research need to be reconsidered. A larger, nationally representative sample at, for example, three to five-year intervals, establishes a baseline and allows for in-depth analysis, while its cost can be amortized by conducting follow-up short-cycle panels with segments of particular interest, such as rural women and women entrepreneurs. This approach facilitates AFI members when assessing the impacts of a crisis, consumer and business sentiment as a leading indicator, the effectiveness of response policies, as well as performance against financial inclusion KPIs at regular intervals.

SUPPLY-SIDE DATA COLLECTION

For supply-side data, which includes information sourced from mandatory regulatory reports or ad-hoc data requests from FSPs, gender information about (retail) clients should typically be available as per KYC requirements, even if not currently reported. Therefore, it is important to request this data from FSPs during a crisis. However, recurring challenges persist, including the consistency of data entry, analytical functionalities and application programming interface (APIs) of core banking systems, SIM card registration without personal identification at mobile money providers, the lack of reporting by non-regulated entities such as cooperatives and non-deposit taking non-banking financial institutions (which can be a substantial part of the financial system), and the split responsibilities for different parts of the system among regulators.

In countries with interoperable payment systems (e.g. Nigeria’s NIBSS), instant payment systems (e.g. India’s UPI, Raast in Pakistan, InstaPay in the Philippines, Brazil’s Pix, or Paraguay’s SPI), or interoperable agent networks (e.g. Nigeria’s SANEF), these systems can provide supply-side data on the usage of financial services and transaction patterns during a crisis, which would otherwise be difficult to obtain.

In Nigeria, data from the Nigeria Inter-Bank Settlement System (NIBSS) and the Central Bank of Nigeria (CBN) were used to estimate the penetration of bank accounts at the country and state levels, as well as banked and unbanked areas by gender. In the absence of readily available data sets, these
Experiences from markets like Honduras\(^{93}\) suggest that these providers can supply gender data.

Sex-disaggregated supply-side data collection can be challenging, requiring the dedicated attention of AFI members. To improve the chances of success, the following three types of activities are necessary:

---

<table>
<thead>
<tr>
<th>KEY RECOMMENDED INTERVENTIONS</th>
<th>KEY RECOMMENDED INTERVENTIONS</th>
<th>KEY RECOMMENDED INTERVENTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>ACTIVE ENGAGEMENT OF FSPS</strong></td>
<td><strong>DEFINE COMMON DATA STANDARDS</strong></td>
<td><strong>ESTABLISH A COMMUNICATED UNDERSTANDING</strong></td>
</tr>
</tbody>
</table>

**RATIONALE**

Define common data standards, particularly in the classification of registered businesses as women-owned, women-led, women-managed, or not. Without clear standards, the important space of female entrepreneurship and women SMEs\(^{94}\) may remain a blind spot. A central consideration is giving precedence to the combination of ownership, leadership, or management (the definition by the IFC and We-Fi\(^ {94}\) allows for either ownership or leadership to qualify).

Reach an understanding whereby: a) regulators and supervisors expect this to be an iterative process, where data quality standards and processes will improve over time as FSPs upgrade their systems, instruct their staff, and work on the backlog of incomplete client entries in the system, and b) FSPs are committed to this effort.

---

\(^{92}\) Available at: [https://grid3.org/spotlight/demographics-of-financially-included-and-excluded-populations-in-nigeria](https://grid3.org/spotlight/demographics-of-financially-included-and-excluded-populations-in-nigeria)


\(^{94}\) Available at: [https://www.afi-global.org/sites/default/files/publications/2018-03/AFi_sme_SR_AW_digital_0.pdf](https://www.afi-global.org/sites/default/files/publications/2018-03/AFi_sme_SR_AW_digital_0.pdf)

\(^{95}\) Available at: [https://www.ifc.org/en/home](https://www.ifc.org/en/home)
ALTERNATIVE DATA FOR DIAGNOSTICS

During the pandemic, new and alternative data sources demonstrated their initial relevance. Social media and smartphones generated information to assess the multi-faceted impacts of the crisis. Aggregate data on mobility at various types of locations (e.g. workplaces, public transportation, hotels, and restaurants) provided by Google provided insights into the extent to which social activity declined, whether due to mandates or the precautionary behavior of citizens. By considering known gender patterns in employment, entrepreneurship, and social interaction, meaningful hypotheses for policy design can be derived from such data.

The analysis of terms dominating search engine requests or social media channels provides a sense of the constraints, urgencies, and priorities of the population. While these sources are prone to gender gaps and have limited usage in many developing countries, they can help complement the overall picture, especially given that waiting for conventional statistics may come at a substantial cost. AFI members could engage with providers of such data to gain access and leverage its potential.

GOOGLE MOBILITY DATA FOR RETAIL, TRANSIT AND WORKPLACE ACTIVITIES (WEEKLY AVERAGES)
**TOOLKIT 3: GENDER-INCLUSIVE CRISIS RESPONSE STRATEGY - MOVING AT THREE SPEEDS**

**SPEED 1: FAST-PACED “FIRE-FIGHTING”**

- Immediate responses to mitigate impact of the crisis using existing or novel, untested tools such as liquidity provision to banks, interest rate changes, and G2P transfers
- Requires the crisis committee and AFI members to regularly review the impact of each tool used and quickly adjust or transition the tools once they are in place

**SPEED 2: ENABLING THE RECOVERY**

- Post-crisis stabilization, introducing measures to enable recovery, for example, expanding the set of policy instruments already in use, stabilizing monetary policy, introducing new data collection
- Tools and interventions in this stage are better planned and are based on the data on the impact of the crisis and on the instruments used in Speed 1

**SPEED 3: “BUILDING BACK BETTER” FOR RESILIENCE**

- Policies introduced that aim to shape the structure of the financial sector and the economy in the medium to long term - for instance, changes in the regulatory framework, design and introduction of new monetary policy or financial stability policy instruments, new coordination committees
- Includes embedding new tools or approaches introduced in Speed 1 or Speed 2 with deeper design, research and consultation, or withdrawing emergency tools that are no longer needed
- Lessons learned from the crisis response are incorporated into policies introduced in this phase through measurement and evaluation

**SPEED 1 - FAST-PACED “FIRE-FIGHTING”**

Fast-paced “fire-fighting” is the first phase in crisis management, when policymakers are trying to understand the crisis and its potential impact on the economy and country, and expedited relief and assistance measures are introduced which have little to no time-lags in implementation and impacts. While such measures can mitigate and even cushion the initial effects of the crisis, they can also mitigate its medium to longer-term effects. Measures introduced in this phase include a combination of interventions already tested in past crises, pre-designed but untested approaches, and new measures. The specific measures chosen will depend on the nature of the crisis. However, it is essential to apply a gender lens from the outset in this phase to prevent the crisis from disproportionately affecting women and women-owned businesses. Key
components of this phase include agility, flexibility, openness to new ideas, and test-review-learn-adjust cycles within short timeframes, such as two week cycles. This approach differs from one where policymakers introduce interventions that are expected to remain unchanged for several months. The Toolkit provided below will assist policymakers in ensuring an appropriate and robust GIF-based initial crisis response.

Deploying a gender lens with accurate data may be difficult in this phase. Nonetheless, it is important to make efforts to collect the data as outlined in the Toolkit and consistently emphasize or inquire about the impact of the crisis and introduced measures on women, as this incentivizes the collection of market intelligence and data. The voices of central banks and financial sector regulators in communicating with a gender lens during a crisis is an important step in creating and gathering data or market intelligence which may not have been available previously. Regular reviews allow policymakers to quickly and flexibly test, learn about, and adapt their tools and responses to prevent the crisis from disproportionately affecting particular sectors, genders, or populations, which if ignored, could have adverse impacts on the economy and hinder the improvement of resilience.

公认的重要贡献包括敏捷性，灵活性，对新想法的开放，以及在较短时间内执行测试-审查-学习-调整周期，例如两个星期的周期。这种方法不同于那些预期在几个月内保持不变的干预措施。提供的工具包将帮助政策制定者确保适当的和强大的基于GIF的初期危机响应。

在这一阶段部署性别视角和准确数据可能很困难。然而，重要的是要努力收集数据，按照工具包所述，以及一致地强调或询问危机和引入措施对妇女的影响。在这种性别视角下，中央银行和金融部门监管机构在危机期间进行沟通是重要一步，这有助于收集市场数据或市场情报，这些可能之前未曾可用。定期回顾让政策制定者能够快速灵活地测试，了解，以及适应他们的工具和反应，以防止危机不公平地影响特定部门，性别，或人口，这些如果被忽略了，会对经济造成负面影响，并阻碍提高韧性的努力。
Establish a team of analysts from financial supervisors, central bank financial stability and Ministry of Finance and Ministry of Economic Affairs to compile data on the impact of the crisis by sector, banking institution, financial services provider, mobile operator, and by gender, for example, to determine the impact on financial stability.

Apply a gender inclusive lens to all data and financial stability impact assessment i.e. if a particular financial services provider or mobile banking provider has disproportionately more women customers classify as a serious impact or high financial stability risk impact.

Identify alternative sources of gender data where conventional data sets are unavailable i.e. transaction data, market intelligence by ringing companies, public outreach, Google data, employers of women, complaints to FSPs.

Establish communication channels of crisis news and tools directly to sources women use including via local women’s groups, charities and pamphlets distributed to ensure regular, clear and accurate communication to women.

Provide a priority phone line or phone service for women to use at financial services providers and government ministries to get information on crisis tools.

Prioritize fee waivers and education for women and women-owned businesses for migration to digital financial services and cashless transactions.

Debt moratoria, loan-loss provisions, fee waivers, lending under credit guarantee schemes needs to ensure equality with women’s businesses or prioritizing access and provision to them.

Channel financial assistance to women (CCT) incl. via gender-informed sector focus, CICO networks, onboarding, and customer support, etc.

Announce about emergency tools by AFI member or government ministry to prevent rumors.

Disseminate information about all tools directly via radio, civil society organizations, direct to citizens means.

Prioritize messaging of gender inclusivity and support for women in crisis announcements and in meetings with private financial services providers.

Report on data from financial service providers on implementation of crisis instruments by gender (ensures that data are collected at implementation, even if they were not available before the crisis).

Fortnightly review of all crisis tools deployed and undeployed.

Fortnightly review data using gender lens of implementation of each crisis tool and impact of crisis.

Present reviews of crisis tools and gender lens in data of crisis tools and crisis impact to crisis committees even if data are not available.

Emphasize and discuss data and impact of crisis by gender in each crisis committee.

Coordinate with financial sector service provider to prioritize collecting gender information and market intelligence as they fire-fight and implement crisis tools.
SPEED 2 - “ENABLING THE RECOVERY”

In Speed 2, the emphasis shifts to deploying tools that facilitate the recovery process. This phase is distinct from the fire-fighting phase and benefits from the availability of data, information, and market intelligence gathered during Speed 1. During this phase, policymakers should concentrate on ensuring the proper and far-reaching implementation of the tools introduced in Speed 1. They should also determine whether these tools are achieving their intended purpose and address any shortcomings in coverage or impact by making the necessary improvements or even developing new and better-designed tools. The objective is now to move beyond crisis mitigation and focus on deploying and optimizing all of the tools to support a full or stronger recovery.

**DIGITIZATION OF FINANCIAL SERVICES**
- Digitize wage payments prioritising women
- Digitize international and remittance payments: by facilitating market entry of new digital payments providers that disrupt the high-cost base of conventional players, we expect this to bring significant benefits to women as the main recipients of remittances in most countries
- Digitize SME banking targeting women-owned businesses
- Promote payments acceptance at small merchants
- Introduce and design incentives to migrate women to DFS e.g. tax rebates, fee waivers
- Re-assess regulation for provider pricing or provide government rebates to balance viability of inclusive business models with incentives for fast ramp-up of DFS
- Facilitate market entry and scaling up of MSME providers offering GIF and DFS products
- Encourage providers to employ a GIF approach to the development of products and services to meet technological and digital skills hurdles for women to adopt DFS e.g. USSD or SMS-based interfaces rather than smartphones or QR Code-based solutions

**GIF CREDIT RISK ANALYSIS AND TOOLS**
- Require FSPs to assess SME and other businesses by gender to create data and insights into the performance, risk and delinquency and default rates associated with women’s business to remove inherent bias
- Educate FSPs on risk and financial performance of women led businesses using research and studies from other countries to highlight the need to conduct lending and credit risk management by gender
- Deploy credit guarantee schemes and debt moratoria schemes prioritising women to reflect actual risks and performance of women owned or women led businesses not presumed risk
Map sectors where women and climate change intersect, e.g. agriculture, biodiversity stewardships, fisheries, forestry, tourism to target these for crisis policy design

Use sector mapping to create and deploy tools that provide financial support, both direct (e.g. G2P) and indirect (e.g. loans, debt moratoria) to GIF and climate vulnerability sectors via women led initiatives or women as beneficiaries

Design policies for both IGF and GIF such as subsidies or tax rebates targeting women’s businesses that meet in-country environmental sustainable goals or climate change priorities

Prioritize funding for women-led investments in green technology and climate-change adaptation including by collaborating with international donors

Identify legal and regulatory requirements and challenges for acquisition and onboarding of female first-time users, and analyze options for reducing these

Designate a team member or sub-team to be the “user’s advocate”, tasked with gathering data and insights on female target beneficiaries to fairly represent their needs and provide comments from their perspective on policy decisions

Promote acceptance of digital payments, especially at small businesses (in urban and rural settings) that serve as primary source of food and household items

Regulate and incentivize for the set-up and good service quality of a dense network of physical sign-up and Cash-in, Cash-out service outlets or agents to lessen the time and mobility demands of women.

Create sandboxes and incubators dedicated to offering DFS and GIF focused solutions to women SMEs - these enable direct communication and feedback in product solution design and raise awareness of women SME financing amongst digital and financial players

Raise awareness for the need for alternative business financing such as non-recourse working capital finance for e-Commerce, “embedded finance”, other supply-chain finance offers as well as leasing for women SMEs

SPEED 3 - “BUILDING BACK BETTER” FOR RESILIENCE

Speed 3, also known as “Building back better”, represents the last and most crucial stage. During this phase, the lessons learned from Speed 1 and Speed 2 strategies, as well as both successful and failed interventions, are thoroughly understood and further researched. Their causes and impacts are also well-documented and analyzed. The primary focus is on integrating the tools and measures which proved successful in Phase 1 into the policy development process, toolkit, and future work program. This is essential to ensure that AFI members and government bodies are more adequately prepared the next time a crisis occurs. To better understand the economic forces, social structures, and challenges within the country, it is important to explore and evaluate the design process and tools that worked, and those that did not, in the responses to Speed 1 and Speed 2. This will lead to improved and innovative policies that address structural shortcomings within the economy, financial sector, and country.
In this phase, the government and AFI members should strive to consolidate the successes achieved in the private sector and by FSPs in the digitization of financial services and in gender-equitable policies and achievements.

There are various ways to accomplish this, but the key message to all stakeholders in the private sector is to continue enhancing their gender-inclusive programs.
Design and introduce incentives for onboarding women into FSPs ensuring viability of FSPs business models e.g. use rebates on low value transactions, compensate fees for account maintenance by revenues from gov. agencies’ G2P payments.

Organize and subsidize sector-wide campaigns to mobilize deposits and thereby structurally reduce funding cost for deposit-taking lenders with women as a key target segment as the often “better savers”.

Allow more employees and agents, not just full-time bank employees or branch staff, to take on customers to enable faster intake of women as they are limited in their mobility.

Explore mandates against FSPs’ agent exclusivity, and not sharing technology and infrastructure to encourage access to agents and services e.g. for cash-in and cash-out.

Award and recognize successful GIF crisis response, invite imitation and offer incentives to FSPs to create crisis solutions for underserved populations.

Create technology based fast communication strategy for clear and credible official government emergency policies released with a focus on underserved or vulnerable populations.

Lower risk capital requirements for loans to women (either across the board or within a risk class/scoring model) to make lending to women more lucrative - when national data also confirm that women are “better repayers”.

Examine the possibility of improving regulation of active selling of financial services and product bundling in light of pragmatic consumer-user considerations to allow financial services providers to benefit from women’s greater willingness to cross-sell.

Introduce interoperability so that new providers do not have to build a critical mass of users, i.e., address the challenges of “network effects” associated with the payments use case.

Enact gender-responsive consumer protection laws to build trust, confidence, and expedite adoption of DFS by women e.g. around issues of privacy and anti-harassment protections, gender-sensitivity of sales staff and product design guidance (Guidance Area 2.1, 2.2 and 2.4) as well as the guidance on consumer awareness, complaint and redress (Area 3) of AFI’s Policy Model for Consumer Protection Protection for DFS Policy Model for Consumer Protection for DFS.
**ROADMAP FOR SPEED 3 (3/3)**

### GIF FOCUSED FINANCIAL AND BUSINESS REGULATION POLICIES

- **Assess trade-offs** between women’s incentives to adopt formal (digital) finance and viability of provider’s business models (Matrix for assessing regulation)
- **Execute initiatives** jointly with other public sector stakeholders to enhance the enabling environment for the formalization of informal businesses to structurally enhance inclusion of many businesswomen
- **Enact regulation** to structurally enhance cost to acquire and serve women (e.g., simplified or tiered-KYC, eKYC with security checks with ID databases, interoperability, regulation on distribution channels and IT systems)
- **Enable market entry / scale-up of providers with inclusive business models and operations** (overall or in designated niches / division of labor with traditional providers) - or include gender-responsive KPIs in licensing of new market entrants
- **Link Measurement & Evaluation to sex-disaggregated target KPIs** for the financial sector to catalyze voluntary GIF action by providers (e.g., by industry “codes”)

### GIF FOCUSED POLICY AND REGULATORY RESEARCH

- **Examine options and viability of (micro-) insurance products** that boost women’s risk coping mechanisms and tie into their efforts to protect their family through research, publications and consultations with stakeholders
- **Examine the viability of introducing open banking standards as well as regulated, fast processes for migrating a client relationship to a new bank and new players through research, analysis and consultation with stakeholders**
- **Measurement and evaluation (M&E)** should present opportunities for enhancing the effectiveness of policies over time, and revising their fit for women, as judged by gender patterns in uptake and usage
TECHNICAL TERMS/DEFINITIONS

GENDER AWARE

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

GENDER BIAS

Prejudiced actions or thoughts that affect a person or a group of people based on their perceived gender. Such bias results in unequal and 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, and can occur in the public sphere, such as in access to financial services and documentation required for bank accounts, as well as in the private sphere within households.

GENDER BLIND

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

GENDER INTENTIONAL

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

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 and provide insights into the effects of an action (investment or project) on imbalances in gender power relations.

GENDER NEUTRAL

A concept, an entity, or a style of language that is 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 TRANSFORMATIVE OR TRANSFORMATION

An approach that identifies the root causes of gender inequality in the field of financial inclusion before analyzing and transforming inequitable gender norms and power dynamics into positive outcomes that directly enhance gender equity.
Gender-Sensitive rapid response and crisis recovery policies