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CONSUMER EMPOWERMENT AND MARKET CONDUCT (CEMC) WORKING GROUP

THE STATE OF GENDER-SENSITIVE CONSUMER PROTECTION

TOOLKIT

CONTENTS

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This toolkit is a product of the Consumer Empowerment & Market Conduct (CEMC) Working Group and its members, and the Gender Inclusive Finance workstream.

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EXECUTIVE SUMMARY

This report provides a consolidated framework for Gender-Sensitive Consumer Protection, building on the mandate of the Denarau Action Plan and aligns with AFI's policy models on Consumer Empowerment and Market Conduct (CEMC), Digital Financial Services (DFS), and Gender Inclusive Finance (GIF).

The report integrates evidence from four complementary streams: a desk-based literature review; a survey of 19 institutions across 16 countries; two interactive workshops; and interviews with AFI members.

Together, these sources identify the main barriers women face in financial markets and propose a set of actionable pathways for regulators to make consumer protection fairer, more effective, and more inclusive.

The Inclusion-Protection Nexus

Over the past decade, access to financial services has expanded rapidly, yet gender gaps persist and disparities are greater in usage, trust, and complaint resolution. As women's participation in finance rises, so too does their exposure to risks such as fraud, data misuse, and opaque pricing. Without adequate consumer protection, inclusion may widen access but not deliver financial health, which according to the Financial Health Network (2020) is the ability to meet obligations, absorb shocks, and plan for the future.

Why Gender Sensitivity Matters

Consumer-protection frameworks written as gender-neutral often fail to address the structural and behavioral constraints women face such as limited mobility and privacy, lower digital access, economic violence, property rights violations, and social gender norms that discourage financial autonomy and agency. Gender-Sensitive Consumer Protection aims to make these realities visible and integrate them into rules, supervision, and market conduct, with a focus on outcomes, such as whether women understand product terms, can seek redress easily, and feel safe using digital channels, rather than on formal compliance alone.

Key Evidence and Insights

The literature, survey, interviews, and workshops converge on three findings.

1. Structural barriers remain pervasive. Weak and inaccessible complaint mechanisms, low financial and digital literacy, limited sex-disaggregated data, and gender biases in product design persist across contexts.

2. Awareness has advanced faster than enforcement. Most AFI members have financial education programs, but fewer have enforceable safeguards or supervisory tools that address women's differentiated risks.

3. Supervision and data use are the missing links. Collecting sex-disaggregated data is not enough; it must feed into dashboards, indicators, intersectionality, and inspection routines that detect gendered patterns in outcomes.

The GSCP Framework

Drawing from these insights, the report introduces a four-pillar GSCP package:

1. **FRAMEWORKS & MANDATES**
Establish explicit gender mandates within consumerprotection laws, national financial inclusion (NFIS), and financial education (NFES) strategies.

2. **MARKET CONDUCT & PRODUCT DESIGN**
Ensure suitability checks, inclusive onboarding, transparent pricing, and gendersensitive digital design.

3. **DATA, REDRESS, & EMPOWERMENT**
Build data systems with SDD, accessible redress mechanisms with service-level standards, and targeted financial and digital literacy programs that enable informed use.

4. **SUPERVISION & ENFORCEMENT**
Embed gender indicators in riskbased supervision, conduct thematic reviews, and apply graduated sanctions to ensure accountability.

Each pillar is supported by practical tools and templates, including standardized sex-disaggregated data reporting forms, redress accessibility standards, gender-sensitive product checklists, supervisory KPI cards, and a comprehensive Monitoring & Evaluation cycle. These instruments transform principles into operational steps that can be adapted to different institutional capacities and behaviors.

Implementation and Measurement

The report also provides an Implementation Playbook, sequencing reforms into short-, medium-, and long-term phases, with defined ownership, milestones, and budget lines. A complementary indicator framework links consumer-protection outcomes (e.g. complaint resolution, fraud incidence) to financial-health metrics. Regular feedback loops, including quarterly reviews, annual dashboards, and thematic evaluations, ensure that evidence leads to learning and continuous improvement.

The Call to Action

Financial inclusion cannot be meaningful without protection, and protection cannot be effective without gender sensitivity. GSCP bridges this gap by turning data into accountability and rights into daily practice. AFI members are encouraged to:

Adopt the four-pillar GSCP framework within their national strategies.

Commit to a minimum set of GSCP indicators to track progress and impact.

Engage in AFI's peer-learning platforms to refine and replicate good practices.

Embedding GSCP across the customer journey — entry, use, redress, and exit — ensures that financial systems protect as much as they include, enabling sustainable financial health for all.

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1 GSCP: FROM ACCESS TO ACCOUNTABILITY

1.1 The inclusion-protection nexus

Global access to financial accounts has expanded markedly in the past decade, yet gender gaps persist. According to the Global Findex Database 2025[1], 79 percent of adults worldwide now have an account, whether at a financial institution or through a mobile money provider, an increase of 28 percentage points since 2011.

The global gender gap in account ownership remains four percentage points, and five points in low- and middle-income economies (LMICs). Regional disparities are still pronounced since this gap reaches 12 percentage points in Sub-Saharan Africa and 15 in the Arab region, while in some regions it is considerably smaller, illustrating both significant progress in financial inclusion and persistent unevenness across and within regions.

Beyond having an account, use patterns among account owners continue to differ by gender. Across regions, women are consistently less likely to make or receive digital payments, for instance, by about 15 percentage points in South Asia, with notable variation across economies. Gaps also appear in formal saving and borrowing behaviors. Women are six percentage points less likely to save formally, while gender differences in formal borrowing reach 8 to 11 percentage points in several regions. These differences point to distinct frictions that can emerge after an account is opened. Particularly, risks and frictions can arise at any moment of the financial journey, for example, when authorizing a payment, speaking with an agent, disputing a charge, or trying to close a product that no longer fits household needs.

All this underscores the importance of moving beyond access to the quality, safety, and usability of financial services. Robust consumer protection frameworks, especially those that are gender-sensitive, help strengthen trust, increase sustained use, and reduce exposure to financial risks, especially in LMICs where regulatory and supervisory systems are still maturing.

To operationalize this need for consumer protection and analyze how quality, safety, and usability manifest in practice, this report adopts a customer-journey lens to make these moments visible and actionable.

We analyze four stages: (i) entry (onboarding, disclosures, and suitability checks before a product is opened); (ii) use (day-to-day servicing, fees and terms in practice, data handling, and agent support); (iii) redress (problem identification, complaints, and alternative dispute resolution); (iv) and exit (account updates, switching, closure, and where relevant, debt resolution).

Viewing inclusion through these stages helps connect rights written in laws and regulations to what women actually experience, while clarifying where protections must be present simultaneously for them to work — for example, simple disclosures at entry are far less meaningful if complaint channels at the redress stage are inaccessible or slow.

We define Gender-Sensitive Consumer Protection (GSCP) as the set of policies, supervisory tools, provider obligations, and consumer-facing processes that ensure fair treatment and safe outcomes for women across all four stages of the journey.[2]

GSCP is not a parallel system; it is a way to make consumer protection effective for everyone by accounting for how gender roles, social norms, and digital realities shape risks and behavior.

[1] World Bank. 2025. Available at: https://www.worldbank.org/en/publication/globalfindex

[2] This definition draws on AFI's policy models on Consumer Empowerment and Market Conduct (CEMC), Digital Financial Services (DFS), and Gender Inclusive Finance (GIF), as well as on global framing from Women's World Banking (2024), "The Case for Gender-Intentional Consumer Protection," and OECD/INFE guidance on gender-responsive financial consumer protection.

Throughout the report, we align three streams of evidence, consisting of a desk literature review, a survey of member institutions, and structured workshop dialogue, against the customer-journey map. This alignment allows us to identify where risks concentrate, where current measures already work, and where gaps persist, so that policy and supervisory responses can be targeted. By translating rights into day-to-day practice at each stage, GSCP contributes over time to stronger financial health for women, understood as the ability to meet obligations, absorb shocks, and pursue financial goals.

1.2 What a gender-sensitive framework adds beyond neutrality

Rules drafted as gender-neutral can still produce unequal outcomes because they are implemented in contexts where women and men face different constraints and incentives. Care responsibilities often limit women's time and mobility, making it difficult to visit offices during standard working hours. Identification and documentation requirements, while important for integrity and risk management, may be harder to meet where women have less formal property or employment records. Digital access may depend on shared or low-spec devices, raising privacy and security concerns that are rarely addressed in product design or agent scripts. Complaint procedures may assume levels of time, connectivity, or confidence that not all users possess. These are structural features of daily life, not exceptional circumstances.

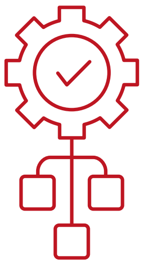
A gender-sensitive framework makes these structural realities explicit and builds them into the design and supervision of consumer protection. It asks whether information is presented in ways that are understandable and usable, not only legally complete, and checks whether suitability assessments consider household cash-flow patterns and caregiving rhythms that shape product use. It reviews whether service channels (physical or digital) are safe and practical for women, including those in rural areas or using shared devices, looks for privacy at the point of service and in data flows, and evaluates whether redress mechanisms can be accessed without prohibitive time or travel costs. Crucially, it requires measurement of outcomes rather than reliance on activity counts alone, that is, not just how many disclosures were sent, but whether women report understanding terms; not just whether a complaint was logged, but how quickly it was resolved and whether similar harms recur.

Such a framework also relies on evidence. It mandates the collection and use of sex-disaggregated data across the customer journey — at entry, use, redress, and exit — so supervisors and providers can see patterns of harm or exclusion and correct them.

And it treats financial and digital literacy as enablers of access and use, complementing (not replacing) accessible design and enforceable rules. In short, a gender-sensitive approach retains universal protections but calibrates them to real-world conditions, so that women can exercise their rights and fully benefit from financial inclusion.

1.3 Positioning within AFI's agenda

The Alliance for Financial Inclusion (AFI) has built a comprehensive guidance ecosystem that covers consumer protection, digital finance, and gender inclusion.



GSCP sits within this ecosystem and helps operationalize it, weaving together AFI's core policy areas, Consumer Empowerment and Market Conduct (CEMC), Digital Financial Services (DFS), and Gender Inclusive Finance (GIF), into a single, outcome-oriented framework that connects high-level inclusion objectives with day-to-day supervisory practice.

This approach is also consistent with AFI's Market Conduct Supervision (MCS) Toolkit, which promotes the integration of consumer-centric metrics, including gender sensitivity, into routine supervisory work so that gender considerations are embedded in standard prudential and market-conduct frameworks rather than treated as parallel add-ons. The development of this report was guided by the GSCP Sub-Group under the CEMC Working Group, with continuous contributions from CEMCWG gender focal points to ensure alignment with AFI's broader policy architecture.

The Denarau Action Plan, AFI's collective commitment to close the gender gap in financial inclusion, provides the strategic mandate; GSCP provides the implementation pathway. By adopting the customer-journey lens, this report offers a practical bridge between high-level commitments and day-to-day regulatory and supervisory practice. The lens helps members link GIF objectives to CEMC supervision and DFS safeguards at concrete moments of interaction. What must be true at entry for disclosures to be understood? What must be monitored during use to prevent mis-selling or data misuse? What standards ensure redress is timely and accessible? What processes make exit and switching clear and feasible?

Positioning GSCP in this way also supports national strategy alignment. Where countries maintain a National Financial Inclusion Strategy and a National Financial Education Strategy, GSCP provides content that can be embedded into governance arrangements, reporting templates, and monitoring and evaluation cycles. It offers a common vocabulary, grounded in the customer journey, for regulators, supervisors, and providers to coordinate their roles. Finally, it strengthens peer learning within the AFI network. By describing protections stage-by-stage and tracking outcomes with sex-disaggregated data, members can meaningfully compare progress, adapt tools to their contexts, and build a shared evidence base on what improves women's financial health alongside compliance and fairness.

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2 GSCP: CONCEPTS, PRINCIPLES, AND ALIGNMENT

2.1 Core concepts and definitions[3]

Building on the definition introduced in Section 1.1, GSCP is a comprehensive framework that integrates protection, empowerment, and accountability across the entire financial product lifecycle. Rather than establishing a parallel system for women, GSCP strengthens existing consumer-protection regimes by ensuring they work effectively for all consumers in practice, particularly for women, who often face differentiated risks and constraints. It examines how regulations, supervision, and provider behavior intersect with gender roles, social norms, and digital realities to shape outcomes in the marketplace.

Building on AFI's existing policy models and the evidence synthesized in this report, we conceptualize GSCP as expanding traditional consumer protection in three complementary ways.

In this sense, GSCP transforms consumer protection from a narrow compliance exercise into a strategic lever for financial inclusion and financial health, ensuring that women not only access financial services but can use them safely, confidently, and with sustained benefits that strengthen their economic security and resilience over time.

2.2 Guiding principles

The conceptual foundation presented in this report builds on AFI's existing policy models and the collective evidence reviewed — literature, survey findings, and member workshops. It outlines six interrelated principles that operate transversally across the entire customer journey, from entry to use, redress, and exit.

[3] Key definitions used in this report are aligned with AFI's Financial Inclusion Dictionary. For full definitions, see Alliance for Financial Inclusion, Words Matter: AFI's Financial Inclusion Dictionary. Available at: https://www.afi-global.org/wp-content/uploads/2024/10/Words-Matter-AFIs-Financial-Inclusion-Dictionary_2023_isbn.pdf

SYSTEMIC COVERAGE

GSCP addresses the full financial journey — entry, use, redress, and exit — recognizing that risks emerge at multiple points and accumulate over time. Gaps in one stage can easily erode safeguards in another. For example, accessible disclosures at entry lose meaning if redress systems are slow or unreachable, and fair pricing during use can be offset by opaque procedures at closure or debt resolution. A systemic approach ensures coherence and continuity of protection, from the moment a product is marketed to the point when it is no longer used.

GENDER AS AN OPERATIONAL FACTOR

GSCP embeds gender as a variable that actively shapes financial behavior, access and use, and financial vulnerability. Differences in time use, education and labor opportunities gaps, caregiving responsibilities, digital access, and bargaining power within households influence how women engage with financial services. For instance, women may rely on shared mobile devices that limit privacy, may hesitate to file complaints if procedures are intimidating, or may face identification barriers due to documentation gaps. Recognizing these realities allows regulators and providers to design protections that are usable and effective in daily life.

ACCOUNTABILITY FOR OUTCOMES

Beyond requiring compliance, GSCP emphasizes responsibility for results. It calls for mechanisms that make both providers and supervisors accountable for the actual experiences of consumers. This includes measurable service standards, transparent disclosure formats, clear timelines for resolving complaints, and data systems that reveal who benefits, who is harmed, and whose cases remain unresolved. Accountability thus shifts consumer protection from a static set of rules to a dynamic process of monitoring, learning, and continuous improvement.

OUTCOME ORIENTATION	PROPORTIONALITY
INTERSECTIONALITY	SYSTEMATIC USE OF DATA
ENFORCEABILITY	ACCESSIBILITY AND USABILITY

Together, they provide a coherent structure for regulators, supervisors, and providers to design protections that are consistent at every stage, identify where risks accumulate, and measure whether protections are producing equitable outcomes.

1 Outcome orientation

Each stage of the journey must be judged by what consumers actually experience, not just by formal compliance. Outcome orientation asks whether women receive and understand disclosures at entry, whether they can use products safely and affordably during use, whether their complaints are resolved promptly and fairly at redress, and whether closure or switching at exit is transparent and free of hidden costs. It directly links GSCP to financial-health outcomes, ensuring that protection frameworks strengthen both confidence and well-being.

2 Proportionality

The level of regulatory and supervisory attention should correspond to the degree of risk observed along the journey. High-risk products or channels, such as digital credit or third-party agents, require deeper supervision at the use and redress stages, while simpler products may rely on lighter requirements focused on entry disclosures and exit transparency. Proportionality maintains balance between inclusion and integrity, keeping safeguards strong without creating unnecessary barriers.

3 Intersectionality

Risks and barriers differ not only by gender but also by age, income, geography, ethnicity, disability, or migration status. Applying intersectionality across the journey means, for instance, designing onboarding procedures (entry) that accommodate low literacy, ensuring complaint channels (redress) are accessible to people with disabilities, or tailoring data-privacy guidance (use) to shared-device contexts. This lens prevents one-size-fits-all solutions and promotes inclusivity at every step.

4 Systematic use of data

Evidence is the backbone of accountability. Regulators should collect and analyze sex-disaggregated data and other relevant indicators for each stage of the journey — tracking who enters the system, who continues to use products, who faces complaints or fraud, and who exits or drops out. Continuous data analysis enables early detection of gendered risks and helps target corrective action precisely where harm occurs.

5 Enforceability

Rules have value only when they can be effectively implemented, monitored, and enforced. Enforceability requires that obligations, such as disclosure templates, service-quality standards, and complaint-handling timelines, be defined clearly and monitored across all journey stages. A transparent enforcement process builds trust, reassures consumers that violations have consequences, and motivates providers to improve conduct.

6 Accessibility and Usability

Protections must be both reachable and practical throughout the customer journey. At entry, women must be able to open accounts with reasonable documentation and comprehend key information; during use, channels and interfaces must be safe and intuitive; at redress, complaint mechanisms must be simple and affordable; and at exit, procedures must be clear and free from unnecessary barriers.

Applied together, these six principles operationalize GSCP as an end-to-end framework, one that follows the consumer journey from first contact to final resolution, ensuring that protection, empowerment, and accountability are present and mutually reinforcing at every step.

2.3 Customer journey as a cross-cutting analytical lens

The customer-journey lens provides the organizing logic that makes GSCP both coherent and actionable. It does not simply describe a sequence of transactions; it captures the lived experience of consumers, particularly women, as they navigate the financial system. By following how interactions evolve over time, the approach exposes where gender roles, norms, and institutional practices intersect to shape access, use, and outcomes.

Applied to regulation and supervision, the customer-journey lens converts behavioral and service-design insights into a gender-responsive policy framework. It divides the financial experience into four interconnected stages — entry, use, problem and redress, and exit — each revealing distinct dimensions of risk and empowerment. Importantly, it is not a linear path but a continuous cycle in which lessons from one stage inform and guide the reforms in others.

Entry marks the moment when expectations and trust are established. For many women, this stage is shaped by identification barriers, documentation requirements linked to property or employment status, or limited confidence when interacting with formal institutions. A gender-responsive approach asks whether disclosures are understandable, onboarding channels are accessible, and the process accounts for care and time constraints that disproportionately affect women.

Use reflects the quality of daily interaction between consumers and providers. Here, gendered patterns of phone ownership, digital literacy, or bargaining power within households influence how women experience products and channels. Service design, agent behavior, and data privacy practices determine whether financial services expand agency or reproduce dependency.

Problem and redress represent the test of institutional accountability. Women are often less likely to file complaints, either because of time burdens, lack of information, or perceptions that their cases will not be taken seriously. Gender-sensitive redress mechanisms therefore emphasize accessibility, confidentiality, and respectful treatment, recognizing that trust in redress builds confidence across the entire journey.

Exit, which includes account closure, switching, or debt resolution, frequently exposes hidden vulnerabilities. Women may encounter difficulties in negotiating repayment, transferring ownership, or ensuring that personal data are deleted after account closure. Gender-responsive policies at this stage safeguard autonomy and privacy, preventing new forms of exclusion as financial relationships end or evolve.

The transversality of this approach lies in how it connects these stages and continuously applies a gender lens across them. Mapping the customer journey by sex, socioeconomic group, or geography reveals where the system unintentionally amplifies gender gaps, such as when digital channels widen access but also heighten exposure to fraud or data misuse for women using shared devices. It allows regulators and providers to see how protective measures at one stage (e.g. clear disclosures) require corresponding support from others (e.g. accessible redress). Finally, the customer journey lens integrates gender analysis with accountability and learning. By aligning data, supervision, and user feedback across stages, it enables evidence-based policymaking that focuses on actual outcomes — who benefits, who remains excluded, and why. In doing so, it transforms GSCP from a compliance checklist into a dynamic process of gender-responsive, accountable inclusion, where every step of the financial experience is designed, monitored, and improved with women's realities in view.

2.4 Sources and Methods

The analysis presented in this report is grounded in four complementary sources of evidence designed to capture both conceptual foundations and practical realities: (i) a comprehensive desk review of academic and policy literature established the conceptual and analytical basis for GSCP; (ii) a structured survey was conducted among AFI member institutions to document current approaches to consumer protection and to assess the degree to which gender considerations are already integrated; (iii) two multi-country workshops provided a collaborative platform to validate survey findings and to explore qualitative insights; and (iv) follow-up interviews with regulators and supervisory staff provided a deeper understanding of institutional contexts, implementation challenges, and enabling factors. Together, these streams ensure that the proposed GSCP framework is grounded both in global knowledge and in the supervisory and policy experience of AFI members.

CASE STUDY: JORDAN
Leveraging Regulatory Opportunities for Gender-Sensitive Consumer Protection

The Central Bank of Jordan (CBJ) has progressively built a framework in which market conduct regulation, sex-disaggregated data, and national strategy reinforce each other, creating tangible opportunities to address women's structural and behavioral barriers.

The foundation for such actions came through the 2017 and 2022 Financial Inclusion Diagnostic Studies, which required financial institutions to report sex-disaggregated data across access, usage, and quality dimensions. This generated a level of visibility uncommon in the region and enabled the CBJ to identify gender-specific risks, such as women's lower digital uptake, limited confidence in formal providers, and high vulnerability to misinformation and unsuitable credit. These diagnostics not only informed national planning, they also created regulatory justification for enhanced conduct oversight.

The National Financial Inclusion Strategy (NFIS) 2018-2020 translated these findings into policy. Under the NFIS, the CBJ strengthened market conduct regulations, expanded disclosure and transparency requirements, and advanced more robust complaint handling standards across banks, MFIs, and digital financial services. Each of these measures created a regulatory entry point to address gendered constraints: clearer product information for first-time female users, stronger redress systems for women with limited mobility or privacy, and oversight of digital channels that disproportionately shape women's financial behaviors.

Crucially, the CBJ institutionalized mandatory gender-disaggregated reporting, creating regulatory pressure for providers to understand and monitor women's outcomes. This not only improves supervision; it enables interventions such as gender-responsive marketing rules, suitability assessments, and targeted financial rights awareness campaigns.

Jordan's experience demonstrates that GSCP advances most when regulators embed gender into supervisory expectations, data systems, and conduct rules — not through standalone programs. For peers, the case highlights the strategic opportunity to use existing financial sector reforms as vehicles to develop coherent and gender-responsive consumer-protection regimes.

3 THE EVIDENCE BASE: WHAT THE LITERATURE SAYS (AND MISSES)

The literature review is presented here as a complement to the survey results, which serve as the primary empirical anchor of the report.

While the survey reveals patterns in institutional practice, the literature explains why gaps in sex-disaggregated data, digital conduct, and redress systems persist, and where gender-blind assumptions in neutral consumer protection frameworks fail. Drawing on converging findings from major global sources (academic articles from peer-reviewed journals, international organization reports from entities such as the United Nations, World Bank, AFI, OECD, and other international financial regulatory institutions), the following synthesis focuses on the main patterns and regulatory implications.

3.1 Barriers GSCP must address

Literature findings show that women experience financial markets differently because of persistent asymmetries in knowledge, access and power. Five barriers emerge consistently as priorities for a Gender-Sensitive Consumer Protection framework.

First, low financial and digital capability increases women's exposure to fraud, over-indebtedness and abusive practices, especially among lower-income and rural users.[4] Studies find that complex loan terms, hidden fees, and opaque digital interfaces are harder to decode when literacy is limited or devices are shared. Education helps, but the literature is clear that this must be combined with simpler products, clearer disclosures, and enforceable safeguards.[5]

Second, formal complaint and redress systems are often inaccessible to women. Time, mobility, documentation constraints, and fear of intimidation push many towards informal problem-solving through family or community channels, which rarely produce restitution or systemic learning. Under-reporting of harm is therefore systematic, leaving supervisors with an incomplete picture of misconduct.[6] Third, the absence of robust sex-disaggregated data is a structural obstacle. Without it, regulators cannot see who experiences fraud, who uses redress, or who drops out of the system.[7] Reviews stress that embedding sex-disaggregated indicators in supervisory templates and dashboards is a precondition for moving from aspirational commitments to accountability.[8] Fourth, biases and discriminatory practices, both human and algorithmic, distort market outcomes.[9] Evidence ranges from maternity penalties in credit underwriting and dismissive treatment of women's complaints,[10] to algorithms that reproduce unequal credit scores or marketing that assumes male decision-makers. These practices erode trust and deter women from using formal channels even when they technically have access.

Finally, structural social norms form the background through which all other barriers operate. Norms around household roles, deference to male relatives, and aversion to personal debt constrain women's agency, time, and confidence.[11] They also encourage delegation of account use to others, undermining protections that assume individual

[4] Organisation for Economic Cooperation and Development. 2022. Consumer vulnerability in the digital age. Available at: https://www.oecd.org/en/publications/consumer-vulnerability-in-the-digital-age_4d013cc5-en.html

[5] World Bank Group. 2017. Good practices for financial consumer protection. Available at: https://www.worldbank.org/en/topic/fina ncialinclusion/brief/2017-good-practices-for-financial-consumer-protection

[6] Ardic, O. P., Ibrahim, J., and Mylenko, N. 2011. Consumer protection and financial literacy: Lessons from emerging markets. World Bank. Available at: https://www.worldbank.org/en/topic/financialinclusion/publication/consumer-protection-and-financial-literacy-lessons-from-nine-country-studies

[7] World Bank Group. 2017. Good practices for financial consumer protection. Available at: https://www.worldbank.org/en/topic/financialinclusion/brief/2017-good-practices-for-financial-consumer-protection

[8] Benöhr, I. 2020. The United Nations Guidelines for Consumer Protection: An international instrument for the digital age. Journal of Consumer Policy, 43(1), 105-124. Available at: https://d-nb.info/1210531887/34

[9] Organisation for Economic Cooperation and Development. 2020. Personal data use in financial services and the role of financial education. Available at: https://www.oecd.org/en/publications/2020/03/personal-data-use-in-financial-services-and-the-role-of-financial-education_cd7e3cf1.html

[10] Women's World Banking. 2023. Policy brief: The case for gender-intentional consumer protection. Available at: https://www.womensworldbanking.org/insights/policy-brief-the-case-for-gender-intentional-consumer-protection/

[11] Alliance for Financial Inclusion. 2022. Policy model for gender inclusive finance. Available at: https://www.afi-global.org/publication/policy-model-for-gender-inclusive-finance/

autonomy and control. Taken together, these barriers appear at every stage of the customer journey: at entry, they limit onboarding and product choice; during use, they magnify risks linked to pricing, service quality and data privacy; at redress, they discourage complaints; and at exit, they make switching or closure costly. The cumulative result is weaker financial health and greater vulnerability to shocks for many women.[12]

3.2 Norms and biases: the missing dimension

Social norms and gender biases are not simply one barrier among others; they are a mechanism that cuts across them all. Yet most consumer-protection analyses focus on laws, institutions, and supervisory capacity, giving relatively little attention to confidence gaps, perceptions of fairness or intra-household power dynamics. Evidence from behavioral economics and gender studies shows that these factors shape how women interpret information, how much risk they are willing to take, and whether they feel entitled to complain or switch providers, just as they shape how providers and markets perceive and serve them.[13]

The literature therefore calls for norm-sensitive regulation and supervision, approaches that make attitudes, stereotypes, and institutional practices visible and open to change.

This includes training frontline staff to recognize implicit bias, communication strategies that challenge stereotypes about women's financial behavior, and supervisory tools that monitor patterns of differential treatment. By explicitly incorporating norms and biases, GSCP moves consumer protection from a narrow focus on legal compliance toward a wider concern with whether rules work for people embedded in specific social systems.[14]

3.3 Implications for regulators

Taken together, the literature does more than catalogue problems; it points toward how regulators can respond.

Once norms, biases, and structural constraints are recognized as central, the task is then to design and enforce rules that are tested against real user experience rather than assumed neutrality.

First, supervision should integrate analysis of discrimination, bias, and norm-sensitivity. This implies examining complaint and redress data by sex and other characteristics, using mystery-shopping or qualitative checks with gendered client profiles, and reviewing marketing, agent scripts, and disclosure materials for language or imagery that reinforces stereotypes. It also requires that regulators reflect on their own mandates, incentives, and internal cultures, and to coordinate with gender equality and data protection authorities. Second, digital finance must be assessed explicitly through a gender lens. The literature highlights gender-differentiated vulnerabilities linked to social-engineering fraud, shared devices, biometric or ID constraints and opaque digital terms. Regulators are encouraged to align digital-finance rules with GSCP principles by ensuring that authentication and onboarding are inclusive and privacy-respecting, that agent conduct and accountability in digital channels are clearly regulated, and that data- and digital-literacy efforts are paired with enforceable protections. Third, success should increasingly be measured in terms of financial-health outcomes rather than only access or procedural metrics. A concise basket of indicators, such as ability to meet routine expenses, resilience to modest shocks, regularity of savings, and levels of financial stress, can be integrated into monitoring systems and, where possible, disaggregated by sex and other relevant characteristics. These indicators create a feedback loop between market conduct and well-being, allowing regulators to assess whether gender-sensitive protections translate into tangible improvements in people's financial lives.

[12] Ireland, D. 2022. Research paper on more gender inclusive consumer protection and other policy, legal and regulatory regimes. Available at: https://papers.ssrn.com/sol3/Papers.cfm?abstract_id=4217687

[13] Alliance for Financial Inclusion. 2022. Policy model for gender inclusive finance. Available at: https://www.afi-global.org/publication/policy-model-for-gender-inclusive-finance/

[14] Organisation for Economic Cooperation and Development. 2022. Consumer vulnerability in the digital age. Available at: https://www.oecd.org/en/publications/consumer-vulnerability-in-the-digital-age_4d013cc5-en.html

4 SIGNALS FROM THE NETWORK: SURVEY FINDINGS

4.1 Who responded and what that implies

The GSCP survey captured responses from 19 institutions across 16 countries, representing all major regions of the AFI network — Sub-Saharan Africa, South Asia, Latin America and the Caribbean, East Asia and the Pacific, the Arab Region, and Europe and Central Asia.

The respondent group included central banks, financial sector regulators, ministries, and development agencies. This diversity provides a useful snapshot of how gender sensitive consumer protection is evolving across distinct mandates and institutional maturities (Table A5.1).

Regional contrasts are notable. Sub-Saharan Africa stands out for relatively stronger engagement in collecting sex-disaggregated data and in experimenting with gender-respownsive financial inclusion strategies such as women-focused savings and lending programs paired with entrepreneurship training. South Asian respondents emphasize financial-literacy programs, but report limited structural safeguards. Latin American regulators display more advanced regulatory reforms, though still narrowly focused on financial inclusion rather than protection. In contrast, respondents from the Arab Region identify sociocultural constraints, particularly those affecting digital inclusion, as their primary obstacle.

Institutional differences also matter. Central banks and prudential regulators focus on data and complaint handling, whereas ministries and development agencies concentrate on financial education programs. Few institutions, however, report explicit GSCP frameworks or systematic evaluation systems for GSCP measures. This lack of formalization suggests that advances in gender-sensitive consumer protection remain largely voluntary or programmatic, rather than mandated signaling intent, but not institutionalization (Table A5.2).

4.2 Main measures adopted

Across institutions, financial education programs dominate the policy landscape. Almost all respondents report initiatives aimed at improving women’s financial literacy or awareness of consumer rights. Thematically, these programs range from household budgeting and responsible borrowing to entrepreneurship training and confidence building in using financial services.

However, the literature’s warning about overreliance on soft tools is echoed by the survey results. While education and outreach initiatives are frequent, the structural and enforceable elements of protection remain weak. Far fewer institutions report having gender-sensitive redress systems, anti-fraud safeguards, or oversight of market conduct violations. In practice, this means that most actions cluster at the entry stage of the customer journey, where women are encouraged to enter and understand the system, but fewer protections accompany them during use (pricing, servicing, data security) or at redress (complaint accessibility and timeliness) (Table A5.3). Even within education initiatives, the survey reveals a misalignment between objectives and needs. Programs often emphasize empowerment and confidence, yet few explicitly teach how to navigate complaint processes or demand fair treatment, gaps that respondents themselves identified as critical. In addition, many literacy programs combine multiple, loosely related goals such as entrepreneurship, consumer rights or budgeting without a clear theory of change or outcome measurement. This disperses resources and makes evaluation difficult.

Digital skills programs tell a similar story. About half the institutions run initiatives to strengthen women’s digital capabilities, though uptake of digital financial services remains low. Respondents attribute this to privacy concerns, fraud risks, and persistent social norms that restrict women’s digital autonomy. The evidence indicates that capability building alone cannot overcome structural frictions in digital ecosystems. Unless digital environments are made safer and more responsive through clear disclosure rules, data protection standards, and accessible e-redress mechanisms, training will not translate into sustained adoption.

In sum, the survey reveals a two-speed system: broad but shallow progress in financial education, contrasted with slow development of structural safeguards, and a lack of coordination between both. This imbalance leaves women better informed in some topics but not necessarily better protected and educated.

4.3 Data and monitoring gaps

Data collection is expanding but remains fragmented and under-utilized. Most institutions gather sex-disaggregated information on basic indicators such as access, usage, and number of complaints. Yet few monitor outcome variables that reveal effectiveness such as satisfaction with redress, frequency of fraud, recurrence of disputes, or financial health and resilience. Crucially, the survey shows that many regulators collect but do not use the sex-disaggregated data they generate. Data are often stored for reporting purposes rather than feeding into supervision or policy design. This collection without connection undermines the potential of sex-disaggregated data as an accountability tool. Where frameworks exist, they rarely require systematic analysis of gendered patterns or mandatory reporting by providers.

Another significant gap concerns the granularity of data across the customer journey. Virtually no institution tracks indicators by stage — entry, use, redress, or exit — making it difficult to pinpoint where risks concentrate.

For instance, complaint data may be disaggregated by sex but not linked to product type, channel, or resolution time. Without these linkages, supervision cannot identify whether women face longer resolution times, higher fraud incidence, or higher dropout rates (Table A5.4).

The absence of outcome-oriented and journey-specific data perpetuates a cycle of weak evidence and weak enforcement. It also limits the ability to assess how protection affects financial health outcomes such as savings regularity, debt stress, or resilience to shocks, and, critically, how these outcomes differ across groups of women with distinct socioeconomic, geographic, or demographic profiles, an intersectional gap that obscures the full picture of vulnerability and impact.

4.4 Support requests

When asked how AFI and its network could best support their efforts, respondents converge on four main priorities: (i) supervisory tools with a gender lens: members request templates, checklists, and risk-assessment frameworks to integrate gender considerations into market-conduct supervision; (ii) standardized sex-disaggregated data frameworks: regulators seek harmonized indicators and reporting templates that can be adopted across jurisdictions, helping to ensure comparability and benchmarking; (iii) guidance on redress systems: respondents emphasize the need for model procedures that make complaint channels more accessible and responsive to women, especially in digital contexts; and (iv) capacity building and training: nearly all institutions call for structured training programs to build internal expertise on GSCP, covering gender bias detection, data analysis, and design of inclusive supervisory processes.

These requests reveal that the main constraints are not necessarily only conceptual but also operational. Regulators understand the importance of GSCP but lack practical tools, human capacity, and consistent methodologies to implement it.

Many also call for platforms to exchange good practices and benchmark their progress against peers, indicating an appetite for peer learning and standardization (Table A5.5).

4.5 Main conclusions from the survey

Taken together, the survey results depict an ecosystem that is engaged but uneven, characterized by enthusiasm, experimentation, and some structural weaknesses. Several headline messages emerge:

1. Financial education dominates, but protection lags. Institutions invest heavily in financial literacy campaigns and awareness efforts, yet these are rarely linked to enforcement mechanisms or evaluated for impact. Structural safeguards, such as gender-responsive redress, anti-fraud systems, and data-protection measures, remain underdeveloped.

2. Data exist, but they are not driving decisions. While sex-disaggregated data collection has become more common, its analytical use is minimal. Few regulators translate data into evidence-based supervision or outcome monitoring.

3. Digital inclusion faces persistent friction. Digital skills initiatives proliferate, but adoption remains low due to safety, privacy, and cultural barriers. Regulators acknowledge that digital inclusion must be coupled with digital consumer protection to be sustainable.

4. Collaboration is high, but formalization is weak. Partnerships with NGOs, FinTechs, and government agencies are frequent but mostly limited to awareness activities; they rarely extend to data sharing, co-supervision, or enforcement.

5. A small vanguard leads by example. A handful of frontrunner institutions, such as those in Solomon Islands, Jordan, Rwanda, and Honduras, demonstrate that combining frameworks, broad sex-disaggregated data, and implemented initiatives produces the most coherent results. These cases illustrate what maturity in GSCP can look like and provide replicable models for peers.

This sequence mirrors the imbalance observed in the literature — an ecosystem strong on participation but weak on accountability. For women, this translates into partial inclusion, access without consistent assurance of fairness, safety, or recourse. The survey also touches, albeit indirectly, on financial health and resilience outcomes. Several respondents link GSCP improvements to potential gains in resilience and confidence, citing that when women trust complaint mechanisms and perceive transparency, they are more likely to save regularly and manage debt proactively. Although quantitative evidence remains limited, this perceived linkage underscores the transformative potential of GSCP when implemented comprehensively.

CASE STUDY: MALAWI

Using Financial Education as a Regulatory Lever for Gender-Sensitive Consumer Protection

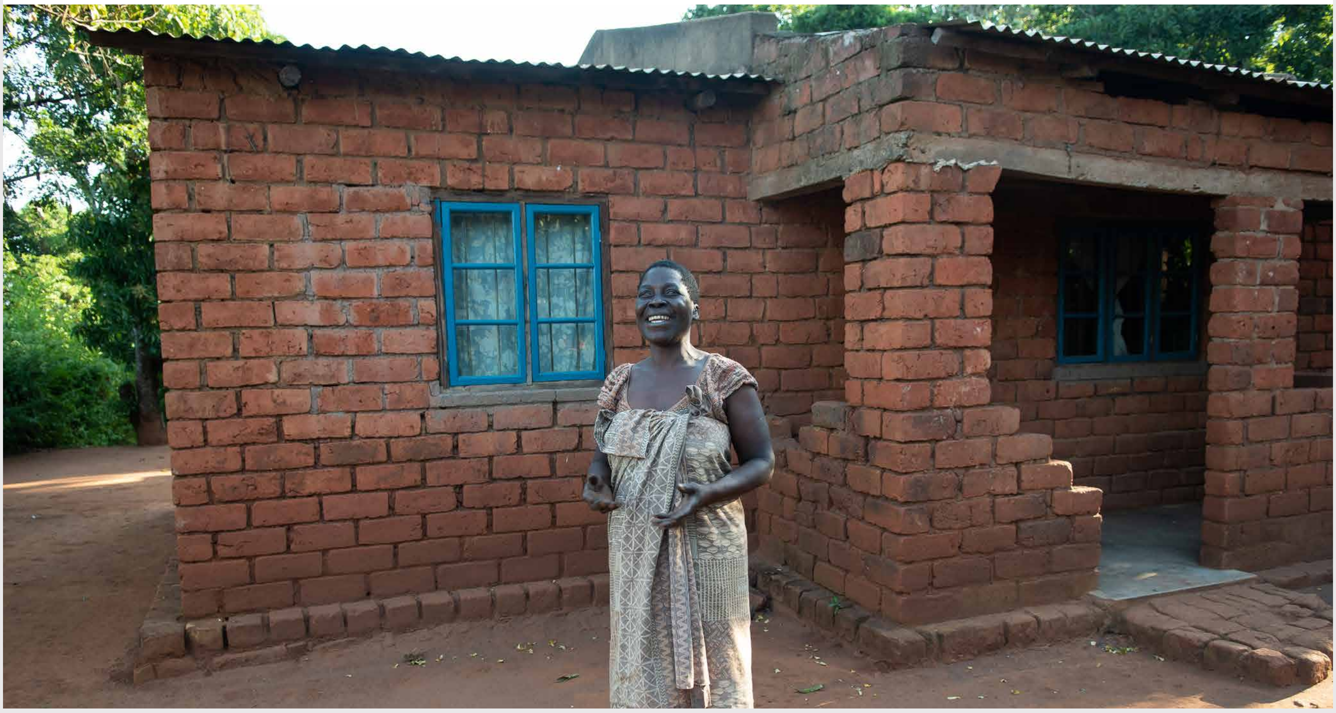
Women in Malawi, especially rural women, informal workers, and women-led MSMEs, continue to face structural barriers including low digital confidence, limited understanding of financial products, and high exposure to fraud. Against this backdrop, the Reserve Bank of Malawi (RBM) has begun integrating financial education into its broader market conduct and financial inclusion agenda, creating a platform for targeted regulatory action.

At the entry stage, Malawi's National Financial Literacy and Capability Strategy (2024–2030) requires that public and private actors provide clear, user-friendly information at the point of onboarding. This creates a regulatory opportunity to require user-testing of disclosures, especially with women and low-literacy groups, and to link product approval to evidence that onboarding materials are understandable and usable.

During use, digital finance presents both opportunity and heightened risk. Malawi's awareness campaigns (on credit reporting, movable collateral, and digital finance) and AFI-supported trainings for women entrepreneurs highlight the need for agent-level safeguards. Regulators can build on this by mandating that agent training explicitly covers educating women customers on safe PIN management, shared phone risks, fee transparency and fraud prevention practices. Financial education can also be embedded directly into digital channels through SMS or USSD prompts explaining rights and redress options.

At the redress stage, the RBM's role in complaints handling provides an opportunity to require that all literacy programs include practical guidance on filing complaints, and that providers report sex-disaggregated complaint data that informs targeted educational interventions.

Across all stages, Malawi's approach underscores the importance of coordinated implementation — between the RBM, ministries, microfinance networks, telecom regulators, and NGOs — to ensure that financial education is aligned with market conduct priorities. For regulators, Malawi's experience demonstrates that well-designed financial education can be a powerful lever to reduce gendered risks and enhance consumer protection outcomes for women.



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5 FROM DIALOGUE TO DIRECTION: WORKSHOP 1

Workshop 1 set a shared diagnostic baseline for GSCP. The session combined a framing deck with peer inputs and an extended Q&A.

Rather than cataloguing initiatives, the discussion focused on how gender risks show up in day-to-day practice and what this implies for policy design, implementation, and supervision.

Three cross-cutting takeaways emerged:

- gender gaps appear most clearly at operational touchpoints (what users actually encounter)
- information and awareness measures have advanced faster than enforceable safeguards
- supervisors want practical ways to see and act on gendered patterns in routine work.

Three gap types that surfaced

Participants converged on three interlinked gaps that explain why existing measures often fail to protect women effectively: policy-design gaps, where rules and strategies do not fully reflect differentiated risks or clearly align inclusion and market conduct roles; implementation gaps, where high-level principles are not translated into simple procedures, scripts, and communication adapted to women's time, mobility, and connectivity constraints; and supervision gaps, where standardized indicators, templates, and analytical protocols are missing to review complaints, market conduct, and disclosures through a gender lens. Together, these gaps create a loop in which design that ignores gender is hard to implement, weak implementation limits what supervisors can observe, and limited supervisory feedback slows learning and redesign.

Pain points

Within this gap structure, participants highlighted recurring pain points: women face complex, time-consuming, and poorly publicized complaint processes that discourage formal redress, especially in rural areas or where privacy is a concern; digital fraud and data-privacy risks are rising faster than conduct safeguards and are still treated mainly as technical issues rather than core elements of market conduct; regulators and providers often lack gender-awareness, tools, and a shared vocabulary to recognize and address gendered risks in inspections, product design, and client interaction; and non-transparent pricing and complex product information continue to generate confusion, overpayment, over-indebtedness, and loss of trust, particularly for women who rely on the verbal explanations of agents. These pain points intersect along the customer journey — at entry (comprehension and onboarding), use (servicing, pricing, data, agents, norms), redress (access and timeliness), and exit (clarity and cost of closure and switching).

Emerging priorities

On the basis of this diagnostic, three priorities emerged: first, mandating and operationalizing a minimum, usable core of sex-disaggregated indicators — focused on variables supervision can act on, such as complaint resolution times and outcomes by sex and channel, fraud incidence, discrimination signals, and product uptake — and integrating them into templates and dashboards; second, making redress genuinely accessible and linked to financial education by simplifying procedures, allowing assisted or proxy submissions, expanding mobile and community-based channels, and setting clear service-level and privacy standards so that women feel safe and able to use complaint systems, while feeding redress data into supervisory analytics; and third, embedding gender-sensitive outcomes within supervision, shifting the focus from counting activities (disclosures delivered, complaints logged) to testing results (comprehension, timeliness, and effectiveness of redress, and differential fraud incidence by sex) through inspection checklists, thematic reviews, and file analysis.

6 CO-DESIGNING THE PATH FORWARD: WORKSHOP 2

The second workshop marked the transition from diagnosis to design. The session invited AFI member institutions to translate the accumulated evidence into implementation pathways.

The discussion focused on how gender sensitivity in financial consumer protection can evolve from an analytical perspective into a structural feature of regulation, supervision, and institutional culture. Participants revisited the same guiding questions from earlier stages of the project, where gender risks arise, how they can be mitigated, and what mechanisms enable accountability, but this time with an emphasis on operationalization and enforcement.

Discussion focused on how gender sensitivity can move from an analytical lens to a structural feature of regulation, supervision, and institutional culture. Participants highlighted the need to rebalance strategies that currently emphasize financial education and awareness while underinvesting in enforceable safeguards, stressing that empowerment and enforcement must advance together. They also underscored that sex-disaggregated data on access and usage are insufficient without outcome indicators (complaint resolution, fraud incidence, satisfaction) and agreed that moving from data collection to systematic data use, through standardized templates, dashboards, and inspection routines, should be a near-term priority. Institutionalization emerged as a third theme: gender is often present in inclusion strategies or non-discrimination language, but rarely embedded in inspection manuals, staff training, or financial-education mandates aligned with observed risks. Digital inclusion was recognized as both opportunity and risk, reinforcing the need to integrate gender considerations into digital finance oversight, agent conduct, authentication, and data protection. Participants also stressed that lasting progress depends on stronger coordination with consumer associations, gender equality institutions, and statistical agencies, breaking silos between financial regulation and social policy.

Overall, Workshop 2 crystallized a shared view that gender sensitivity must evolve from commitment to capability, with stronger rules, data systems, and institutional routines improving the quality and fairness of consumer protection while providing the bridge into the four-pillar implementation framework set out in the next section.

7 EMERGING PRACTICES FROM MEMBERS

Gender-sensitive financial consumer protection (GSCP) is still taking shape across the member institutions interviewed, yet the emerging practices documented through interviews reveal meaningful entry points for regulatory action.

Although none of the countries consulted has a dedicated GSCP framework, regulators are — often unintentionally — building components of one through adjacent agendas: financial inclusion strategies, digital-finance oversight, financial literacy campaigns, fraud prevention work and market conduct supervision. These scattered but promising initiatives show that GSCP is not emerging from a single policy instrument but from an accumulation of small, practical adjustments in how regulators diagnose risks, interact with providers, and understand women's experiences in the market.

7.1 Potential direction

Across member institutions, a set of early practices, scattered but increasingly deliberate, reveal how elements of gender-sensitive financial consumer protection are beginning to take shape within existing regulatory and supervisory functions. These practices are not emerging from formal GSCP frameworks, which none of the interviewed countries possess, but from the way regulators respond to observed risks in financial literacy, digital finance, complaints patterns, and market conduct.

One of the clearest areas of dynamism is financial literacy. Across Cambodia, Pakistan, and Jordan, among others, literacy initiatives have become a practical window into women's real experience of the financial system. These programs routinely surface issues that conventional supervision does not capture: misunderstandings of fees, low digital confidence, agent dependence, and recurring privacy and fraud concerns. What makes literacy particularly influential is that it creates early signals of where consumer-protection gaps lie. Even in jurisdictions where consumer protection remains generic, literacy teams have unintentionally become diagnostic units for gendered vulnerabilities.

Sex-disaggregated data represents a second area of meaningful progress. Rwanda provides the most structured use of sex-disaggregated data (SDD), integrating it into dashboards, complaint analytics, and supervisory prioritization. Jordan is developing tools to monitor product use and complaint patterns by sex, while Pakistan uses multiple SDD sources across its NFIS monitoring cycle. Together, these practices demonstrate that SDD is becoming an operational asset rather than a reporting formality, especially when combined with supervisory analytics.

A third emerging direction is the gradual incorporation of gender considerations into market conduct supervision. This does not yet constitute gender-responsive supervision, but regulators are introducing elements that reveal a trajectory: pilot checklists capturing agent behavior or fee transparency; supervisor training modules that address gender bias; or the use of dormancy and fraud pattern differentials as inspection triggers. These early steps are notable because they anchor gender sensitivity within day-to-day supervisory routines instead of treating it as a separate policy agenda.

Finally, digital finance has surfaced as a domain where gendered risks are both the most visible and the most urgent. Interviews consistently pointed to shared device vulnerabilities, agent assisted transaction risks, and escalating digital fraud disproportionately affecting women. Regulators in multiple countries now recognize that digital conduct rules, privacy-by-design requirements, assisted channel safeguards and safe use prompts may be necessary to prevent digital inclusion from becoming digital harm.

Taken together, these observations indicate that GSCP is emerging from practice. The most promising shifts are occurring in the functions closest to consumer experience — literacy, digital finance, complaints handling, and inspection. This bottom-up pattern suggests a realistic path for institutionalizing GSCP over time.

CASE STUDY: PAKISTAN
From Gender Mainstreaming to Gender-Intentional Supervision

Pakistan illustrates how regulatory effectiveness strengthens when gender objectives are embedded in national strategies and reinforced by supervisory follow-through. The State Bank of Pakistan (SBP), which regulates nearly 90 percent of the country's financial assets, has adopted a dual approach: **gender-responsive regulation** through its Banking on Equality (BoE) policy, and **gender-intentional supervision** through systematic offsite and onsite monitoring. The BoE embeds non-discrimination clauses, requires sex-disaggregated reporting, and mandates women-sensitive product development and workplace diversity across the banking sector.

A central insight from the interview is how the SBP identifies gender-specific risks: through sex-disaggregated data, complaint-handling analysis, and supervisory investigations that revealed disproportionate digital fraud against women. This evidence led to a regulatory intervention, namely **mandatory biometric verification for account opening**, which was initially resisted by institutions due to cost but later recognized as reducing fraud and improving women's safety. Pakistan is one of the few jurisdictions where gender data directly triggers supervisory action, demonstrating the importance of **diagnostic capacity** in closing the gap between frameworks and outcomes.

The case also highlights **regulatory opportunities moving forward**. First, Pakistan's experience shows that gender sensitivity gains traction when anchored in **national financial inclusion targets**, supported by multi-agency coordination with the Ministry of Women and Youth, the Ministry of Finance, telecom regulators, and international partners such as ADB, GIZ, and AFI. Formalizing these partnerships into a **standing inter-agency committee on gender and market conduct** would institutionalize collaboration beyond project cycles.

Second, while sex-disaggregated reporting is strong, the next step is to **expand intersectional data**, including age, geography, and socioeconomic status, to refine supervisory risk assessments and identify subgroups experiencing layered vulnerabilities.

Third, the forthcoming BoE 2.0 presents an opportunity to introduce incentive mechanisms (e.g. recognition schemes or tiered compliance ratings) that motivate financial institutions to operationalize gender commitments more consistently.

Pakistan demonstrates that when regulators proactively intervene, coordinate systematically, and supervise intentionally, gender-sensitive consumer protection evolves from an aspirational concept into an operational reality, providing a roadmap for peers seeking to deepen their own regulatory maturity.

7.2 Transferability and guardrails

The practices identified above hold important lessons for transferability. While they cannot be transplanted wholesale across jurisdictions, they provide structural insights into what conditions enable GSCP to take root, and what safeguards are needed to prevent fragmentation or unintended consequences.

A first lesson is that financial literacy can serve as an accessible entry point for gender-sensitive protection, especially where supervisory capacity is limited. However, literacy is not a substitute for enforceable rules. Transferability requires pairing educational measures with structural safeguards — transparent disclosures, complaint accessibility, and digital-security protections — so that responsibility does not shift disproportionately onto women.

A second lesson concerns the institutional value of sex-disaggregated data. SDD becomes transferable when it is embedded in governance structures that can act on it, such as NFIS committees or market-conduct units. The guardrail here is analytical capacity, since without routine analysis and supervisory follow-up, SDD risks remaining descriptive rather than actionable.

Inspection-related practices offer another transferable pathway. Countries that have incrementally incorporated gender elements through modest checklist adjustments, targeted supervisor training, or revised prioritization criteria demonstrate that GSCP can be operationalized without major system redesign. Yet feasibility is critical since adding requirements without sufficient supervisory capacity can dilute impact. Transferability therefore hinges on ensuring that inspection changes remain proportionate and manageable.

Digital-finance insights are highly transferable because the underlying risks, including fraud, privacy breaches, and agent dependence, are ubiquitous across markets. However, their adoption requires proportionate implementation.

Regulators need clear risk thresholds, simple conduct rules, and realistic standards that providers can operationalize. Overly complex digital requirements could unintentionally burden the very institutions that serve women the most.

Finally, governance structures determine whether emerging practices become institutional norms or remain isolated initiatives. Jurisdictions with established NFIS mechanisms or inter-agency working groups find it easier to integrate gender considerations across data, literacy, digital finance, and supervision. Where coordination is ad hoc or absent, progress tends to remain project-based and dependent on individual champions. The main guardrail is therefore institutional anchoring since GSCP gains traction only when responsibilities, data pathways, and decision structures are formalized.

7.3 Evidence strength tags

Across jurisdictions, conceptual clarity on gender sensitivity in consumer protection varies widely. Some regulators, such as in Armenia, adopt a gender-neutral stance grounded in findings from their Financial Capability Barometer (FCB) and other national surveys. This data shows that gender differences in financial literacy, financial inclusion, and related domains are generally small or statistically insignificant. On this basis, the authorities apply uniform consumer protection rules across all population groups, women and men, urban and rural, younger and older, under the consideration that equal treatment is appropriate given the available evidence.

Others, notably Pakistan and Jordan, apply a gender-mainstreaming logic, embedding non-discrimination clauses and gender diversity mandates into regulatory frameworks. In Pakistan a gender-sensitive approach is gaining traction, focusing less on frameworks and more on outcomes — embedding women-centered design in product development, complaint handling, and digital access.

It is important to recognize that institutions operate along a spectrum of gender integration, ranging from gender-neutral to gender-intentional approaches. The next step should be to identify where each institution currently stands on this spectrum and to develop concrete action plans to advance toward greater intentionality. Only at the gender-intentional end of the spectrum do institutions demonstrate a genuine understanding of gender as a structural and behavioral determinant of financial risk, access, and outcomes.

Few institutions employ a systematic diagnostic framework. Those that do rely on a combination of:

- Consumer complaints and grievance mechanisms, often disaggregated by sex (Jordan, Pakistan).
- Surveys and satisfaction assessments that capture user experience (Jordan, Women's Financial Empowerment programs).
- Sex-disaggregated data and dashboards, used to track trends and identify structural barriers (Pakistan, some African and Asian cases).
- Targeted studies conducted in collaboration with statistical agencies or NGOs (e.g. savings groups and rural women in community programs).

In other cases, as in Armenia, data is collected but not used diagnostically, as findings showing no gender gap do not lead to the exploration of unmeasured barriers. This case highlights the importance of building a clear business case for gender-sensitive consumer protection that demonstrates how integrating gender considerations not only promotes equity but also strengthens market integrity, enhances consumer trust, and expands the client base. Without such a rationale, gender sensitivity risks being perceived as an add-on rather than as a core component of effective regulation and sustainable financial sector growth.

Where gender is integrated, it takes different forms:

- Regulatory mandates and anti-discrimination clauses (Pakistan's Banking on Equality policy (review for case study) and Jordan's circulars on gender diversity in boards).
- Supervisory follow up on gender mainstreaming, including onsite verification of compliance and sex-disaggregated reporting.
- Targeted programs such as women-focused financial literacy, digital literacy, and savings groups (Jordan, community-based initiatives).
- Client-centered design, emphasizing the perspectives of women consumers (a growing approach in South Asia's digital finance ecosystem).

However, in several jurisdictions, gender integration remains superficial or rhetorical. Institutions may report that they are "inclusive" or "non-discriminatory", but without mechanisms to test outcomes. In these cases, gender sensitivity is interpreted as neutrality, not intentional redress of structural inequities.

By contrast, countries that apply gender-sensitive consumer protection demonstrate three operational traits: (i) evidence-based regulation, linking consumer data to supervisory action; (ii) feedback loops between women users and financial institutions; and (iii) targeted capacity building within institutions to translate gender objectives into practical measures (e.g. training, monitoring indicators, incentive systems).

Interviews highlight significant variation in implementation capacity and a common weakness in institutional coordination. Collaboration is strongest in financial-education programs, where ministries, NGOs, and financial institutions already have established partnerships. This is where they feel more comfortable as it is a "safe space for collaboration". Institutions such as central banks, ministries of education, gender agencies, and NGOs can cooperate without overlapping jurisdictions or legal conflicts. As one pattern in the interviews suggests, consumer protection enforcement is viewed as the exclusive mandate of regulators, whereas education and awareness are areas where multiple actors can contribute freely. They are also generally considered low-cost, high-visibility wins. Coordination weakens in enforcement, data sharing, and evaluation, areas requiring joint accountability mechanisms and shared infrastructure. This was already reflected in the survey.

Institutions that have made notable progress, most clearly exemplified by Pakistan's central bank in the interviews, demonstrate that policy effectiveness increases when gender objectives are formally embedded within national financial inclusion strategies and supported by structured inter-agency mechanisms. In Pakistan, the regulator's dual approach, consisting of regulatory mainstreaming and supervisory follow up, ensures that commitments translate into measurable results. Gender targets are integrated into both the national financial inclusion framework and the banking on equality policy, which sets clear expectations for financial institutions to improve women's participation as clients, employees, and decision-makers.

These efforts are anchored in collaboration. The regulator coordinates closely with the Ministry of Women and Youth, the Ministry of Finance, and telecommunications authorities, recognizing that financial inclusion for women requires joint action across multiple sectors. Partnerships with international development partners, notably the Asian Development Bank (ADB), the Alliance for Financial Inclusion (AFI), and GIZ, provide both technical expertise and financial support, helping to institutionalize reforms and build the internal capacity needed for sustained implementation. This collaborative architecture allows the central bank to align regulatory mandates with national gender priorities, ensuring coherence between financial inclusion, consumer protection, and economic empowerment policies. It also enables continuous learning and adaptation: data from supervisory reviews, consumer complaints, and sex-disaggregated reporting are regularly fed back into program design and regulatory updates.

In contrast, where gender targets are not explicitly embedded in national strategies or tied to formal coordination structures, progress tends to remain fragmented and project-based, often dependent on short-term campaigns or individual champions. Pakistan's example thus underscores that institutionalized coordination, through formal working groups, shared targets, and capacity partnership, is a decisive factor in turning policy commitments into practice.

In systems where gender objectives are not anchored in governance structures, for example, Armenia, where coordination mechanisms on gender are not explicitly mandated due to their survey evidence suggesting minimal gender differentials, progress tends to evolve through project-based initiatives or the efforts of individual champions rather than through fully institutionalized processes.

Interviewees acknowledged that coordination can be strengthened by:

- Establishing formal inter-agency committees or working groups on gender and financial consumer protection.
- Developing shared data platforms to align monitoring and evaluation.
- Using incentive structures (awards, recognition programs) to motivate compliance.
- Promoting local-level implementation to reach underserved women and ensure sustainability.

Most regulators now collect sex-disaggregated data, often limited to rural or urban and male or female variables. More advanced institutions are beginning to integrate intersectional analysis, considering socioeconomic status, geography, and age, to identify compounding barriers.

In stronger examples, such as Pakistan, data analysis directly informs supervisory priorities and policy adaptation (e.g. biometric verification for women's account safety). In weaker cases, data remain descriptive, serving reporting rather than decision-making functions.

Interviewees stressed that data must translate into trust since without user confidence that complaints will be heard and acted upon, consumer protection frameworks risk losing legitimacy.

Interviews point to several promising practices:

- Proactive regulatory intervention, recognizing that market forces alone will not close gender gaps (Pakistan).
- Integration of digital literacy and gender-sensitive risk mitigation in financial inclusion programs (Jordan).
- Community-based savings groups that build women's financial capability and leadership (Solomon Islands).
- Institutional incentives that promote gender diversity in governance (Jordan's circular on women in boards).
- Cross-sector collaboration, aligning regulators, ministries, and NGOs around common gender targets.

The most effective institutions view consumer protection not as an isolated mandate but as a systemic enabler of inclusion, literacy, and trust.

Across interviews, coordination emerged as both the greatest enabler and the weakest link. While many regulators acknowledge the importance of collaboration, institutionalization remains limited.

Existing mechanisms are often project-based, voluntary, or dependent on external partners, lacking formal mandates or sustained funding. To strengthen coordination and systemically embed gender sensitivity, interviewees suggested:

1. Embedding gender targets within national financial inclusion strategies and regulatory frameworks; these include a range of actors which strengthens the focus.
2. Establishing standing inter-agency committees that include consumer protection, gender, and data authorities; these serve as "safe spaces" for thinking, sharing, and implementing.
3. Developing shared monitoring indicators for both financial inclusion and consumer protection outcomes.
4. Creating incentive systems, such as awards or public recognition, for institutions demonstrating progress.
5. Investing in capacity building for regulators and market players to operationalize gender-sensitive principles.

Institutionalization, in this sense, is not only procedural but cultural: it requires shifting from gender-neutral to gender-intentional systems, where equity and trust are measurable components of market conduct.

8 CONVERGING LESSONS FROM LITERATURE, NETWORK SIGNALS, AND DIALOGUE

This section brings together insights from three complementary sources of evidence: the academic and institutional literature, member survey, and participatory discussions from both workshops, enriched by interviews with regulators and global partners.

When viewed through the customer journey lens, covering entry, use, redress, and exit, the evidence shows where perspectives converge, where emphases differ, and what those differences reveal about institutional capacity and priorities. It also provides a coherent map of the risks and protections that define women's real financial experience, forming the bridge toward the policy package in the following section.

8.1 Where the evidence converges

Across all streams, a consistent pattern emerges. While access to basic financial services has expanded in many contexts, women's financial inclusion remains uneven, particularly among vulnerable groups, and is further constrained by unequal conditions of use and redress that limit the quality and safety of their participation. The literature underscores how gender norms, social expectations, and digital constraints shape these conditions, while survey and workshop results confirm that institutional responses remain skewed toward financial education rather than enforcement.

At the entry stage, evidence converges on the need for plain language disclosures and onboarding that are both understandable and usable. Regulators from Rwanda and Jordan alike emphasized that financial literacy programs alone cannot ensure comprehension if product information remains overly technical or inaccessible. In Jordan's case, this is reinforced by regulatory requirements obliging financial institutions to ensure transparency, clarity, and accuracy in their contracts, advertising, and customer communications. Workshop discussions added that onboarding materials should be tested with real users, particularly women with low digital confidence, to confirm usability before implementation.

During use, all sources identified digital finance as the most dynamic but also most risk-intensive space. Interviews from Rwanda and Women's World Banking highlighted rising exposure to digital fraud, misuse of personal data, and gendered dynamics in mobile-money use — such as shared phones and loss of control over income within households. Rwanda's regulators also noted that women's reliance on agents and shared devices increases their vulnerability to PIN disclosure, transactional errors, and unauthorized withdrawals, underscoring the need for more gender-responsive agent-conduct supervision. Pakistan's experience further illustrates this point.

Supervisory data revealed disproportionately high exposure of women to digital channel fraud, prompting the regulator to introduce biometric verification requirements for account opening to reduce risks. These findings align closely with the workshop's identification of digital safety and agent conduct as key gaps in market conduct supervision.

At the redress stage, convergence is especially strong. The literature, survey, and workshop discussions all show that complaint systems are among the least gender-responsive elements of consumer protection. Processes tend to be lengthy, centralized, and poorly known. Rwanda's Central Bank, for instance, collects sex-disaggregated data on complaints but noted the need to translate data into systematic supervisory action. Jordan's experience echoed this point, with multiple redress channels fully disclosed under regulatory requirements and consumer rights featuring prominently in awareness campaigns. However, usage patterns suggest that some consumer groups, particularly women with lower digital access, engage less frequently with these mechanisms, highlighting the importance of continued outreach to ensure equitable uptake. Pakistan likewise highlighted the value of verifying complaint data through onsite supervision, a practice that helps ensure accuracy and detect gender-specific risks. The global perspective offered by Women's World Banking confirmed that these barriers are widespread, especially for women who rely on informal intermediaries or shared devices.

Finally, at exit, all streams point to a structural blind spot. Account closure, switching, and debt resolution are rarely framed as gender-relevant issues, yet the evidence suggests they can determine whether inclusion leads to empowerment or indebtedness. Where transparency is lacking or procedures are cumbersome, women may be unable to disengage safely from unsuitable products, amplifying their financial stress.

Beyond these stages, two cross-cutting themes surface repeatedly. The first is the uneven availability of robust, actionable sex-disaggregated data across the customer journey. In Jordan, for example, the CBJ has recently embarked on building a gender-disaggregated database for WMSMEs, in cooperation with external experts, with banks, finance institutions, and the credit bureau reporting indicators on women-owned deposits and borrowings. In addition, the National Financial Inclusion Strategy includes sex-disaggregated data on access, usage, insurance, account ownership, finance, and savings, helping to highlight gender disparities. Rwanda's Financial Inclusion Dashboard similarly reflects movement from data collection toward interpretation, while Pakistan's regulator complements these approaches by benchmarking institutions against gender-disaggregated targets and validating reported data through onsite inspections. Taken together, the interviews show that while data systems are advancing, their maturity and analytical use still vary across jurisdictions.

The second is the central role of institutional coordination, since no single agency can ensure gender-sensitive protection alone. National cases and workshop discussions show that progress depends on collaboration among regulators, financial institutions, gender ministries, and consumer organizations. Rwanda's experience reflects this challenge, as coordination is strong in financial education programs, though officials noted that collaboration weakens when moving into market conduct, supervision, or data-sharing, mainly due to resource constraints and the absence of formalized cross-agency mechanisms.

8.2 Where emphases differ — and why that matters

While the three evidence streams align on diagnosis, they diverge in emphasis, reflecting their distinct mandates and vantage points. The literature places the strongest weight on the role of social norms and behavioral constraints, analyzing how gender expectations shape decision-making, confidence, and financial agency. It views consumer protection as inseparable from broader empowerment and financial education, emphasizing intersectionality and the need to tackle biases embedded in product design and service culture.

The survey, by contrast, reflects the perspective of regulatory practitioners. Its focus falls on formal measures, such as financial education programs, disclosure requirements, and awareness campaigns, as these are concrete and measurable within existing institutional mandates. This explains why financial education dominates the survey responses, it is an area regulators can act upon even without new legislation or supervisory capacity.

The workshops shifted the focus toward implementation and supervision, revealing the practical constraints that make frameworks effective, or not. Participants highlighted the lack of gender-disaggregated indicators, operational templates, and training, as well as the need for coordination and institutionalization between inclusion, market conduct, and digital finance departments.

The interviews with regulators and global experts help interpret these variations in emphasis, explaining why literature centers on social norms, surveys focus on education and formal measures, and workshops emphasize operational feasibility. They also provide additional context on how institutional mandates and resource realities shape what each actor sees as feasible within the GSCP agenda.

Jordan's experience shows how consumer protection is advancing largely through financial inclusion strategies embedded in the National Financial Inclusion Strategy (2023-2028), including women-focused savings and lending products, nationwide financial awareness campaigns, and coordinated working groups and data initiatives that integrate gender considerations into market conduct and financial education policies.

Rwanda demonstrates stronger integration of gender into conduct supervision but faces funding and capacity limits. Women's World Banking adds the global lens as frameworks alone do not build trust unless women experience protection in practice. These variations reveal that the key challenge is not conceptual disagreement but uneven institutional maturity, with some authorities focusing on what to do and others on how to do it. Recognizing these differences is essential to realistically sequencing reforms.

8.3 Mapping risks along the customer journey

When viewed across sources, risks cluster consistently along the customer journey. At entry, the most common issues are limited comprehension of disclosures, complex onboarding processes, and identification requirements that disproportionately exclude women lacking formal documentation. At the use stage, recurrent risks include digital fraud, opaque pricing, financial exclusion, misuse of personal data, and inconsistent agent conduct, issues accentuated by digitalization, and limited supervision of third-party providers. Redress remains the weakest link since complaint channels are often difficult to access, slow, and not perceived as confidential or fair. At exit, women may face penalties or procedural obstacles to closing accounts, switching providers, or resolving debts, perpetuating cycles of dependency.

Each stream highlights different nodes along this chain. The literature adds the dimension of social norms and confidence gaps that shape risk exposure; the survey captures institutional practices around disclosure, education, and redress; the workshops translate those into operational priorities; and the interviews validate them through concrete national experience. The convergence across these sources provides a reliable diagnostic baseline for designing policy responses that mirror the sequence of risks women actually face.

8.4 Practical implications for regulators

Synthesizing these insights yields several implications for regulatory and supervisory authorities. First, data must drive design: sex-disaggregated and, where possible, intersectional indicators should inform every stage of policy and supervision, from product authorization to redress review. Second, supervision must test usability, not just compliance. Understanding whether disclosures are read, redress systems used, and fraud channels reported is essential to judge effectiveness. Third, coordination mechanisms matter as much as rules. Working groups that connect inclusion, conduct, and digital finance teams can help institutionalize gender sensitivity. Fourth, capacity building is a regulatory function, not an add-on. Training supervisors to recognize and interpret gendered risks should be embedded within inspection and reporting systems.

In parallel, regulators across the network are investing in improving their supervisory infrastructure through enhanced data repositories and AI-enabled tools, including early versions of LLM-driven analytics. These efforts, primarily aimed at detecting sophisticated, AI-enabled fraud and strengthening market-conduct oversight, also indirectly advance the GSCP agenda by enabling supervisors to identify gender-differentiated risk patterns faster and more accurately. As fraud typologies evolve and become more targeted, especially against digitally active women, the development of supervisory tools that can incorporate sex-disaggregated data, flag anomalies, and map behavioral risk signals becomes a cross-cutting enabler of gender-responsive supervision. In this sense, the movement toward mainstreaming GSCP is unfolding alongside, and often accelerated by, the broader digital-supervision reforms undertaken by regulators.

Across these findings, a consistent pattern emerges in which the survey highlights where gender-differentiated risks materialize in practice, while the literature and workshops clarify why they persist, revealing the operational, behavioral, and institutional factors that shape women's experience across the customer journey. When interpreted together, the evidence points to a single practical message that regulators cannot rely on compliance-based supervision alone, and that effectiveness requires understanding how real users interact with products, staff, and digital channels, and adjusting supervisory tools accordingly.

Finally, the synthesis underscores that gender sensitivity is not a separate agenda but a measure of how well consumer protection works for all users. Embedding this perspective transforms the abstract goal of fairness into a concrete operational mandate by ensuring that every stage of the customer journey functions equitably and predictably for women and men alike. The following section builds directly on this foundation, translating these lessons into the four-pillar implementation framework envisioned as the next practical step toward a coherent, enforceable, and inclusive GSCP system.

9 POLICY PATHWAYS: A FOUR-PILLAR GSCP PACKAGE

The Gender-Sensitive Consumer Protection (GSCP) package proposed here translates the collective findings from the literature, survey, workshops, and interviews into a concrete roadmap for regulatory action.

The four pillars are modular but cumulative, allowing countries to start from their existing approaches and progressively deepen their frameworks. Each pillar addresses one layer of the ecosystem, including legal mandates, market behavior, user empowerment, and supervisory enforcement, while maintaining the customer journey orientation across the Entry, Use, Redress, and Exit stages. Financial and digital literacy are positioned as enabling factors, not substitutes for regulation, with financial health as the ultimate policy outcome.

1 Pillar I Frameworks and Mandates

Objective: Create an explicit legal and institutional mandate for GSCP that empowers regulators to require, monitor, and enforce gender-sensitive consumer protection.

The first step is to ensure that gender sensitivity is not treated as an optional dimension but as a core regulatory principle. This involves integrating GSCP objectives into national strategies such as the National Financial Inclusion Strategy (NFIS) and National Financial Education Strategy (NFES), issuing market conduct circulars that recognize women as a priority consumer segment, and establishing clear mandates for regulatory agencies, including indicators, actions, responsible parties, and budgets.

A key lesson from the workshops was that clarity of mandate determines the ability to act. Without explicit recognition in strategies or statutes, even well-intentioned regulators struggle to implement measures, coordinate with peers, or allocate resources.To make this process actionable, the report proposes two practical tools.

TOOL A REGULATORY MANDATE DIAGNOSES MATRIX

This matrix helps regulators visualize what already exists and what is missing in their legal and regulatory environment. Each row represents a consumer-protection element (e.g. disclosures, data privacy, redress), while columns track whether gender-sensitive clauses, operational standards, SDD requirements, and supervisory tests are already defined. The tool supports a quick gap analysis and enables taskforces to assign institutional responsibility and priority levels for each gap. Importantly, it also highlights the need for financial education components designed with a gender lens and informed by behavioral insights — addressing the social norms, cognitive biases, and time constraints that shape how women perceive information, manage risk, and interact with financial institutions.

The idea behind it is that it can replace ad hoc mapping exercises with a single accountability dashboard, so regulators can see who owns what and where GSCP mandates must be strengthened. *A Template of the matrix is available in Annex 1.*

TOOL B MODEL CLAUSE SNIPPETS

These are short, ready-to-adapt examples of legal or regulatory text that can be incorporated directly into circulars or regulations. For example:

- A usable disclosure clause that requires pre-testing with representative consumer groups before launch.
- A redress accessibility clause that mandates at least two low-friction channels and time-bound resolution (e.g. within 30 days).
- A sex-disaggregated data reporting clause defining the specific variables and reporting frequency.

The reasoning behind this tool is that, instead of starting from scratch, regulators can embed these tested formulations into existing laws, speeding up institutional alignment while maintaining flexibility for national adaptation.

> Together, these two tools give structure to the most intangible element, mandate clarity, transforming commitment into codified authority.

2 Pillar II Market Conduct and Product Design

Objective: Ensure that products and services are designed and delivered in ways that are transparent, inclusive, and safe for all users, particularly women, including those facing additional vulnerabilities such as living in rural areas, low literacy, disability, or income-related constraints.

This pillar moves from "what regulators should require" to "how providers should behave," converting legal principles into operational standards for market conduct and product design. The guiding question is: Does the product, as used in practice, allow women to understand, choose, use, and exit safely? This requires recognizing that women are not a homogeneous group, and that intersectional vulnerabilities such as geography, literacy, disability, and income must inform both market conduct rules and product design.

To ensure usability across diverse contexts, the pillar introduces a minimum set of accessibility requirements: disclosures must be available in simplified formats suitable for low-literacy users; onboarding and key facts content must be deliverable via low-tech channels (including USSD and basic SMS links); and providers serving markets with high informality must demonstrate that assisted transactions and agent interactions follow clear, gender-sensitive conduct standards. These practical measures allow members to translate gender-sensitive design principles into immediately actionable steps, even in low-connectivity environments.

To achieve this, standards should be grounded in a solid understanding of demand, meaning that they are adapted to women's specific needs, constraints, and preferences as identified through demand-side data, user testing, and behavioral and gender analysis. To strengthen effectiveness, these user tests should be iterative rather than one-off, incorporating behavioral nudges and repeated comprehension checks to capture how real users understand disclosures over time. These assessments should also incorporate an intersectional lens, accounting for how rural location, literacy levels, disability, age, and income shape differentiated risks and user experiences. Regulators can enforce this through targeted actions, such as:

- Requiring suitability and affordability checks, one page key facts statements, and safe digital design standards that integrate privacy, consent, and usability from the outset.
- Ensuring that product testing explicitly includes women from diverse socioeconomic groups, including rural users, low literacy segments, and persons with disabilities.
- Incorporating iterative behavioral testing cycles using simplified re-testing, A/B disclosures, and behavioral nudges to ensure that comprehension and usability persist beyond initial pre-tests.

To operationalize these, two tools are recommended, and achieving their full impact may require complementary training and gender-sensitivity awareness activities across all institutional levels, from frontline staff and supervisors to policy designers and senior management.

TOOL C GENDER-SENSITIVE PRODUCT CHECKLIST

This is a structured review sheet used during product authorization and periodic assessments, and includes specific "pass/fail" criteria across stages of the customer journey — clarity at entry, fair pricing during use, accessibility of redress, and transparency at exit. For instance, before a product is approved, providers must show that disclosures are understood by at least 80 percent of test users, or that closure fees are clearly stated.

The underlying premise behind this tool is that a checklist replaces general notions of fairness with measurable standards, making supervision more objective and predictable. *A Template of the checklist is available in Annex 2.*

TOOL D AGENT CONDUCT AND SCRIPT STANDARDS

Agents are often the first, and sometimes only, interface for women consumers. This tool provides standardized scripts and behaviors that agents must follow. For example, introducing fees transparently, explaining complaint steps, and verifying customer understanding. Supervisors can audit compliance through mystery shopping and assign corrective actions. By professionalizing frontline behavior, regulators strengthen the credibility of consumer protection and build trust, especially for women entering formal markets for the first time. The tool also helps prevent the transmission of gender biases and social norms in agent interactions, ensuring that information, tone, and service delivery remain respectful, neutral, and empowering for all consumers. *A Template is available in Annex 3.*

> Together, these tools not only translate fairness into practice but also reduce ambiguity for providers, turning what was previously "soft guidance" into a concrete, testable expectation.

3 Pillar III Data, Redress and Empowerment

Objective: Create the informational and procedural infrastructure that allows regulators to monitor inclusion quality and users to effectively exercise their rights.

This pillar is about making protections real in daily life through usable data, responsive redress, and empowered consumers. Within this pillar, accessible redress becomes a foundational requirement. The framework establishes simplified complaint procedures, including step-by-step scripts, visual or audio instructions, and short-code USSD or SMS channels, that allow users with limited literacy, shared phones, or low connectivity to lodge and track complaints. These mechanisms are positioned as mandatory in markets where digital divides disproportionately affect women and informal sector users.

Participants in Workshop 2 emphasized that protection systems often fail, not for lack of intent but for lack of infrastructure, such as no consistent sex-disaggregated data collection, no shared data dictionary, and complaint systems that are opaque or intimidating. Three mutually reinforcing tools are proposed to correct this.

TOOL E SEX-DISAGGREGATED DATA REPORTING TEMPLATE

This standardized form ensures that providers report comparable information every quarter across the four journey stages:

- Entry (new accounts, onboarding completion)
- Use (activity rates, fraud and reversal statistics)
- Redress (complaint volume, resolution time, satisfaction)
- Exit (closure, switching, restructuring)

By making the invisible visible, sex-disaggregated data becomes the evidence base for supervision and policymaking, and further enables regulators to spot where women face bottlenecks, whether at the onboarding, transaction, or complaint stages. Additional guidance should ensure that providers apply consistent rules for missing data, document validation steps, and undergo periodic data quality audits to strengthen comparability across systems. Quarterly SDD submissions constitute the primary input for the Supervisory Dashboard and the annual GSCP Scorecard. *A Template is available in Annex 4.*

TOOL F REDRESS ACCESSIBILITY STANDARD

This is a simple, yet powerful reference tool that specifies service levels for complaint systems, defining procedural limits (e.g. acknowledgment in one day, resolution in 30), multiple entry points (call center, app, community kiosk), and privacy protocols for sensitive cases. Supervisors can benchmark providers against these metrics and publish comparative results. The rationale behind it is that a fair redress system is one people actually use. This standard converts access to redress from an abstract right into a measurable service obligation while requiring explicit provisions for digital and remote environments to ensure that complaint channels accommodate mobile users, shared-device contexts, and risks arising from agent-assisted or third-party submissions. *A Template is available in Annex 5.*

TOOL G FINANCIAL AND DIGITAL LITERACY MICRO-MODULES

While data and redress address structural barriers, literacy addresses informational barriers. These four short, modular learning units — Safe Start, Smart Use, Your Rights, and Clean Exit — are designed for quick deployment through apps, community workshops, or SMS campaigns. These micro modules focus on critical moments in the financial journey when misunderstandings, scams, or misinformation are most likely, and they complement enforcement by ensuring consumers can recognize and act on their rights. *A Template is available in Annex 6.*

> Together, these tools make the system both responsive and self-reinforcing, as data identify issues, redress resolves them, and empowerment prevents their recurrence.

4 Pillar IV Supervision and Enforcement

Objective: Embed gender sensitivity in risk-based supervision, act on evidence, publish results.

The focus is on consolidating supervision practices that integrate gender sensitivity into everyday oversight through targeted analytics, regular thematic reviews, and transparent enforcement. To strengthen enforcement clarity, supervisors should also define explicit legal or regulatory consequences for repeated non-compliance, including corrective action plans, fines, license conditions, or heightened supervisory monitoring.

Authorities should embed gender tests into both offsite and onsite supervision. Offsite analytics should flag patterns such as disproportionate complaint rates, unresolved cases, or higher dormancy among women. During onsite inspections, supervisors can use a short Gender Test Module — a structured checklist verifying whether providers pre-tested disclosures for comprehension, trained agents on inclusive scripts, and coded complaint files by sex. These tests make it possible to move from general "inclusion monitoring" to evidence-based risk detection.

Regulators can also dedicate one review cycle to a specific stage of the customer journey periodically. For example, Year 1 could focus on Redress, covering auditing complaint handling systems, timeliness, and privacy protections, while Year 2 could focus on Digital Use, evaluating agent conduct, data protection, and fraud-response mechanisms. This rolling approach ensures depth without overburdening supervisory teams and progressively builds institutional learning.

Public accountability transforms compliance culture. Regulators should begin publishing GSCP enforcement bulletins that can be short quarterly or annual summaries highlighting common breaches, anonymized case studies, and improvements achieved. Where feasible, results can be disaggregated by sex or product type to demonstrate fairness and no discrimination biases in outcomes. Such transparency reinforces credibility, encourages voluntary compliance by providers, and helps consumers understand that complaints lead to real consequences and clarifies the consequences applied when institutions repeatedly fail to meet required standards.

TOOL H ONSITE "GENDER TEST" MODULE

This module serves as a field companion for inspectors, translating broad consumer protection principles into verifiable questions. Typical checks include:

- Was disclosure material pre-tested for clarity and comprehension?
- Do agent scripts explicitly explain fees and complaint procedures?
- Are complaint records coded by sex and tracked against service-level agreements?
- Does the provider have a documented fraud response protocol, including reversal timelines and client notification logs?
- Are account closure cases completed within seven days with all fees disclosed in advance?

The purpose is not to penalize individual staff but to identify systemic gaps. Inspection outcomes should also trigger predefined supervisory actions when systemic weaknesses persist across review cycles. Inspection results, which feed directly into the supervisory dashboard and allow for comparative analysis across institutions and over time, should follow the same quarterly integration cycle even if field visits occur semi-annually, to ensure alignment with SDD reporting and dashboard updates. *A Template is available in Annex 7.*

To support members with limited supervisory resources, the framework introduces a "GSCP Basic Inspection Checklist", a lightweight tool that supervisors can apply during routine visits before full templates or dashboards are operational (*Tool H2*). The checklist focuses on four essential dimensions: (i) simplified disclosure and onboarding practices; (ii) agent conduct and assisted digital transactions; (iii) availability of USSD/SMS and low-literacy redress channels; and (iv) presence of the core SDD indicators. This offers an immediate pathway for operationalizing GSCP even in low-capacity contexts.

TOOL I SUPERVISORY DASHBOARD SPECIFICATION

The dashboard provides supervisors with a real-time visual summary of gender-sensitive market indicators. To strengthen impact measurement, the dashboard should incorporate empowerment outcomes, such as sustained usage, retention, complaint satisfaction, and improvements in financial health, rather than only operational outputs.

Core widgets include:

- **Entry** : account-opening conversion rates by sex; proportion of incomplete or rejected onboarding; gender biases or social norms.
- **Use** : dormancy ratios, average fee burden distribution, and frequency of digital fraud incidents.
- **Redress** : complaint resolution performance against Service Level Agreement targets, satisfaction scores, and escalation rates.
- **Exit** : timelines for account closure or switching, share of debt restructuring approvals by sex.

Each widget applies red, amber, or green (RAG) thresholds, automatically flagging outliers. Dashboards allow drill downs to the provider or regional level, with quarterly or annual trend lines to monitor progress.

Beyond analytics, the dashboard is a management tool that informs supervisory planning, supports thematic review scheduling, and generates evidence for public GSCP bulletins. Over time, integrating these visual insights into decision-making ensures that gender sensitivity becomes an operational norm, not an occasional exercise, and provides an evidence base for applying escalating enforcement actions in cases of repeated underperformance. Complementing output indicators with outcome-focused measures helps assess whether consumer protection efforts translate into real improvements in women's ability to use, retain, and benefit from financial services. To further enhance public accountability, GSCP bulletins should also include simplified visuals and plain language narratives that are accessible to low-literacy audiences and non-technical users.

The Dashboard consolidates quarterly SDD data and incorporates inspection insights following the harmonized supervisory cycle.

A Template is available in Annex 8.

10 IMPLEMENTATION PLAYBOOK: SEQUENCING, ROLES, AND RISKS

The implementation playbook translates the four pillars into a realistic, time-bound program with clearly assigned ownership, responding to the emphasis voiced during Workshop 2: feasibility, collaboration, and evidence-based progress tracking.

Rather than prescribing a one-size-fits-all blueprint, the playbook offers a modular roadmap that regulators can tailor to their own institutional maturity. Each phase builds on the last, ensuring that design, supervision, and measurement evolve in parallel. Communication, awareness and public facing campaigns should operate as transversal enablers across all phases, helping ensure that GSCP reforms are understood, trusted, and used by consumers — particularly women.

10.1 Governance and coordination

Effective implementation begins with governance. A GSCP Taskforce anchors coordination among agencies that each hold a piece of the consumer-protection puzzle.

The lead market conduct regulator should chair the taskforce to ensure authority and continuity. Core members should include the market conduct supervision department, the Digital Financial Services unit, the national statistics or data office, the financial consumer ombudsman, the data protection authority, the gender ministry or equality body, a representative consumer association, and, where relevant, the payments or e-money regulator. This cross-section guarantees that policy design, data collection, and enforcement move in step. Before initiating implementation, the taskforce should conduct a light feasibility assessment to map existing staffing, IT infrastructure, and supervisory capacity, identifying any gaps that may require sequencing adjustments or external technical assistance.

A *Coordination Charter* *(Annex 9)* formalizes the taskforce's scope, membership, and decision rules, and establishes a secure data sharing protocol with privacy safeguards. Its function is to prevent coordination from relying solely on personal networks, creating institutional accountability from the outset.

Also, a *Workplan and Budget* *(Annex 10)* is required to break the tasks into quarterly milestones, define outputs (e.g. dashboard MVP launch, redress pilot completed), assign leads, and map donor or technical-assistance support. The budget ensures that the GSCP's actions appear in the annual financial plans of agencies, avoiding dependency on ad hoc funding. This workplan should be preceded by a resource feasibility review detailing the minimum IT, analytical, and staffing requirements for each task, enabling regulators to realistically prioritize.

The taskforce should also embed a coordinated communication and awareness function. This includes agreeing on clear messaging to the public on new rights, standards, and complaint options, and ensuring that communication teams in each agency are aligned. Early integration of communication staff helps translate technical reforms into accessible information and guarantees consistency across campaigns, digital channels, and consumer facing materials.

GSCP objectives and reporting lines must be aligned with existing NFIS and NFES governance frameworks. It must be specified where GSCP indicators feed into NFIS committees, secretariats, and annual progress reports, embedding gender-sensitive protection into national financial policy rather than treating it as a side project. Interview insights show that governance effectiveness depends not only on formal structures but also on institutional maturity and the degree of gender intentionality. In jurisdictions where gender sensitivity is treated as gender-neutrality, coordination tends to remain fragmented, project-based, or dependent on individual champions. By contrast, systems that embed gender targets into national strategies, create permanent inter-agency committees, and share monitoring indicators tend to sustain more coherent action and clearer accountability. Regulators also emphasized the need for ‘safe collaboration spaces’ — particularly around financial education — where different agencies and market actors can coordinate without jurisdictional tension. Strengthening the taskforce therefore requires complementing formal tools (charters, RACIs, shared data platforms) with mechanisms that promote durable engagement, such as internal incentives for participation, structured feedback loops with women users, and partnerships that help build long-term analytical and supervisory capacity.

The *RACI matrix (Annex 11)* translates coordination into operational clarity. Journey stages (Entry, Use, Redress, Exit) are listed down the rows, while agencies appear across the columns. Each cell is marked R (Responsible), A (Accountable), C (Consulted), or I (Informed) for every task, such as SDD template design, redress service level agreement standard rollout, inspection-module update, or dashboard maintenance. A visual RACI avoids overlap and shows at a glance who drives, who supports, and who must be kept informed at each step.

10.2 Phasing

Phased implementation allows institutions to learn while building systems. Each stage has clear goals, deliverables, and triggers for advancing to the next stage. The times are suggested, but should be revised, discussed, and defined by each country.

PHASE 1 FOUNDATION (0–12 MONTHS)

The focus is on proof of concept and data readiness.

- Regulators issue Circulars on sex-disaggregated data and Redress Minimums, formally introducing the templates and standards.
- Following this, a Pilot of the SDD Template (Tool E) should be performed with major providers, conducting data quality checks, and publishing a short GSCP Indicator Baseline Note summarizing initial gaps.
- The Redress Accessibility Standard (Tool F) should be deployed in some financial institutions, testing Service Level Agreement tracking and privacy tags.
- The Supervisory Dashboard MVP (Tool I) should be built with four core widgets — entry conversion, fraud incidence, complaint Service Level Agreement compliance, and exit timelines — allowing supervisors to visualize performance early.
- Launch a foundational awareness campaign explaining new data collection practices, consumer rights, and redress minimums, helping prepare consumers and providers for the changes introduced in Phase 1.

To improve cross-tool consistency, the GSCP reforms should adopt a harmonized reporting cycle in which quarterly SDD submissions feed the Supervisory Dashboard, semi-annual inspection findings (Tool H) validate SDD patterns, and all are consolidated annually in the GSCP Scorecard. This alignment ensures that data, supervision, and public reporting move in a coherent timeline.

PHASE 2 INSTITUTIONALIZATION (12–24 MONTHS)

Once the tools are validated, the second phase scales them system-wide and embeds them in supervisory routines.

- Extend SDD and redress standards to all regulated providers; make the Gender Test Module (Tool H) mandatory in routine inspections.
- Require the Gender-Sensitive Product Checklist (Tool C) for every new retail-product authorization to guarantee pre-testing for comprehension.
- Publish an Annual GSCP Scorecard ranking providers on key indicators (resolution times, fraud rates, female activation) to build transparency and competition. The scorecard aggregates quarterly dashboard indicators and inspection findings into a single annual performance report.

- Integrate financial health questions into national demand-side surveys so that outcomes, such as resilience to shocks, become measurable.
- Roll out coordinated communication campaigns that translate the new standards into simple guidance for consumers and frontline provider staff, ensuring that the scaling of GSCP tools is matched by clear public understanding.

PHASE 3 CONSOLIDATION (24–36 MONTHS)

The final phase focuses on sustainability and continuous improvement.

- Link GSCP indicators directly to risk-based supervision models, assigning higher risk weights to persistent outliers.
- Conduct a thematic evaluation (e.g. Redress after two years: access, timeliness, and quality) to assess systemic change.
- Codify effective practices into binding regulations or prudential and market-conduct rulebooks, ensuring that temporary pilots become institutional norms.

CONCRETE TOOL K SEQUENCING PLANNER

A one-page Gantt chart lists actions as rows and quarters (Q1–Q12) as columns, including owners, budgets, and technical assistance sources. It acts as a living project management dashboard where color-coding (green = on track, amber = delayed, red = critical) provides a quick performance snapshot. This planner keeps momentum visible, transforming a complex reform into a manageable sequence of concrete deliverables. *A Template is available in Annex 12.*

10.3 Capacity — Building the People Who Make It Work

Rules and templates succeed only if people know how to use them. Capacity development must therefore accompany every phase.

Focus areas

- Supervisors need mastery of gender-risk concepts, outcome-based file review, digital fraud typologies, interview and mystery shopping techniques, and clear sanction communication. This mastery should also emphasize the links between financial education, financial inclusion, consumer protection and overall financial health, ensuring that supervisors understand how each dimension reinforces safer and more effective financial engagement for women.
- Data teams require skills in validation rules, outlier detection, and reproducible dashboard design, underpinned by strong privacy and security awareness.
- Providers must learn to pre-test disclosures, train agents on inclusive conduct, analyze complaint data, and proactively plan remediation. As well as for the supervisors, this training should also emphasize the links between financial education, financial inclusion, consumer protection, and overall financial health, ensuring that providers understand how each dimension reinforces safer and more effective financial engagement for women.
- Communication teams should be equipped to design gender-sensitive campaigns, translate regulatory changes into accessible language, and support behavioral change objectives across the customer journey.

CONCRETE TOOL L GSCP COMPETENCY FRAMEWORK

The framework defines the five competency domains:

- Gender and Behavioral Risk
- Digital and Data Protection
- Inspection and Evidence Collection
- Analysis and Visualization
- Communication and Enforcement. This domain also covers the ability to identify and address gender biases and social norms that influence consumer behavior, provider conduct, and enforcement outcomes.

Each domain is graded at Foundational, Practitioner, and Advanced levels, with explicit learning outcomes and assessment tasks, such as auditing complaint files and classifying outcomes by sex or constructing a fraud heatmap using quarterly data. Short e-modules and peer learning exchanges complement classroom training. The framework professionalizes GSCP as a discipline within supervision, allowing regulators to certify competence and retain institutional knowledge despite staff turnover. *A Template is available in Annex 13.*

10.4 Risks and Mitigation

Anticipating risk is part of sound design. The table below expands the common risks and the measures to mitigate them.

Predictable, transparent enforcement transforms fear of regulation into a cooperative compliance culture.

Risk	Where It May Arise	Expanded Mitigation Strategy
REPORTING BURDEN FOR PROVIDERS	PHASE 1-2	Simplify templates and align them with existing regulatory returns to avoid duplication. Pilot with 3-5 providers to test effort versus benefit. Provide user manuals and validation feedback so data entry becomes self-correcting.
POOR DATA QUALITY/ COMPARABILITY	PHASE 1-2	Adopt a common Data Dictionary (Template 16) and automated validation rules. Quarterly data quality reviews return flagged anomalies to providers for correction. Publish aggregate data quality scores to incentivize compliance.
LEGAL UNCERTAINTY ON DATA/ PRIVACY	PHASE 1	Cross-reference existing data protection legislation and design privacy-by-default templates. Formalize cooperation through a Memorandum of Understanding with the Data Protection Authority specifying data use, retention, and breach notification procedures.
LIMITED BUDGET/ CAPACITY	ALL PHASES	Embed GSCP tasks in NFIS and NFES workplans so they draw on core funding. Sequence activities by leverage, start with high-impact actions such as SDD and redress before expanding to advanced analytics. Leverage donor technical assistance for specialized training.
LOW REDRESS UPTAKE	PHASE 1-2	Introduce assisted or proxy complaint options specifically designed for women, community intake points, and outreach campaigns with a gender lens showing successful cases. Measure satisfaction on a quarterly basis and publish user stories to normalize use of redress channels. Complement this with sustained communication campaigns that build awareness of complaint channels and demonstrate quick wins and user success stories.
RESISTANCE TO ENFORCEMENT	PHASE 2-3	Engage providers early through consultation workshops. Define clear Service Level Agreement targets and a graduated sanction ladder. Publish anonymized case studies demonstrating fair and proportionate enforcement to build legitimacy.

11 MEASURING WHAT MATTERS: INDICATORS AND EVIDENCE USE

The ultimate measure of GSCP is not how many activities are completed but whether consumers experience safer, fairer outcomes. This section defines a core indicator set, a data architecture, and the feedback loops that convert numbers into supervision and learning.

11.1 Core Indicators by Journey Stage and Financial Health

Indicators should be few but actionable, disaggregated by sex (and, where feasible, age, region, and other relevant variables for having an intersectional understanding), and directly linked to financial health outcomes, such as the ability to meet obligations, resilience to shocks, and proactive planning behavior. Every metric must have a clear definition, formula, frequency, data owner, and supervisory consequence.

Indicator Reference *(Annex 14)*

Entry Disclosure Comprehension Rate. Measures whether product information is actually understood. Derived from provider pre-tests where users must recall four of five key terms. Targets ≥ 80 percent comprehension before launch; below 70 percent triggers a re-design.

Entry DFS Activation within 30 Days. Tracks early use as a proxy for onboarding quality. Persistent gender gaps signal onboarding or confidence issues.

Use Pricing Transparency Index. Composite 0-100 score from mystery shopping on fee quotation and comparability; low scores trigger thematic inspections.

Use DFS Fraud Incidence (per 10 000 users by sex). A rise among women indicates vulnerabilities in digital channels or agent conduct.

Redress Complaint Resolution within the Service Level Agreement. Percentage of complaints closed ≤ 30 days. Published quarterly in a league table; non-compliant providers must file remedial plans.

Exit Timely Voluntary Closure Rate. Percentage of closure requests completed ≤ 7 days. Low performance implies barriers to switching or hidden fees.

Financial Health Ability to Meet Routine Expenses and Resilience to Shock. Annual survey items that capture well-being outcomes beyond access.

Each indicator entry in Annex 14 contains fields for the baseline, targets (Y1–Y3), thresholds and alerts, and linked supervisory action.

TOOL M JOURNEY-STAGE KPI CARDS

Journey-Stage KPI Cards are concise supervisory tools that present a small, high-priority set of key performance indicators (KPIs) for each stage of the customer journey. Each card summarizes between three and five measurable indicators, showing current performance, target levels, and color-coded alert thresholds. The distinctive feature of this tool is its use of "if-then" supervisory triggers that translate data into predefined actions. For example, if the rate of confirmed digital fraud cases among female users exceeds the acceptable threshold for two consecutive quarters, then the supervisor launches a thematic inspection and requires the affected providers to submit a remedial action plan within 30 days.

By embedding these conditional triggers, the cards ensure that monitoring leads directly to timely intervention, reducing the lag between problem identification and corrective action. Supervisors move from passive data receipt to active risk response.

A Template is available in Annex 15.

11.2 Data Collection of Supply and Demand by Design and Quality

A robust Gender-Sensitive Consumer Protection system depends on an integrated data architecture that connects supply-side administrative data with demand-side feedback from consumers. This dual-source model allows regulators not only to track compliance but also to understand lived experiences—bridging the gap between legal rights and daily realities. The goal is to create a data pipeline that produces reliable, comparable, and actionable insights at each stage of the financial journey.

Supply-side data

Financial institutions, mobile money operators, and other regulated entities submit periodic information using standardized Sex-Disaggregated Data templates (Annex 4). These templates capture indicators for all four stages of the customer journey — entry (new accounts, onboarding completion), use (active accounts, transaction volumes, fraud incidence), redress (complaint volume, resolution time, satisfaction), and exit (closures, switching, debt restructuring).

Supervisory data warehouse

All supply-side data feed into a centralized supervisory data warehouse, managed by the market conduct authority or data office. The warehouse operates with a standardized schema, meaning each data point, such as complaint resolution time or account closure rate, has a uniform definition and coding structure. Every record is time-stamped, and all modifications are logged through automated audit trails, ensuring traceability and data integrity.

Built-in analytics dashboards allow regulators to generate real-time summaries, trend analyses, and gender gap diagnostics. This architecture ensures that data is not merely stored but actively used to drive supervision, policy dialogue, and accountability.

Demand-side data

Supply-side data alone cannot capture the full experience of users. Therefore, the GSCP framework adds a demand-side survey module integrated annually into existing national instruments such as the National Financial Inclusion Survey (NFIS) or household well-being surveys.

This short module captures users' perceptions of fairness, ease of redress, understanding of product terms, trust in providers, and key financial health outcomes such as the ability to meet obligations or withstand financial shocks. By comparing these subjective measures with objective administrative data, regulators can triangulate whether consumer protection policies translate into real improvements in financial well-being.

In addition to these quantitative surveys, complementary qualitative instruments, such as focus groups and client-interview panels, are recommended to explore gender social norms, in-branch discrimination, and other behavioral or contextual barriers that cannot be fully measured through structured questionnaires. These qualitative insights provide depth to survey findings and help regulators interpret patterns in the data, design more targeted interventions, and understand the lived experiences behind indicators of financial health and protection.

Privacy and data security

All data collection follows privacy-by-design principles and complies with national data-protection legislation. This includes role-based access controls (ensuring that only authorized staff can view sensitive data), encryption at rest and in transit, and automated retention and deletion schedules that define how long data may be stored. Any data-sharing between regulators (for example, with gender ministries or statistical offices) is governed by a memorandum of understanding specifying confidentiality, access levels, and use restrictions.

Applying a gender lens to data privacy and security means recognizing that breaches or misuse of personal information can have differentiated and more severe consequences for women, for example, in cases involving joint accounts, shared mobile devices, or household control over financial decisions. Gender-sensitive data governance therefore requires explicit safeguards for privacy in data collection, reporting, and publication, ensuring that personally identifiable or sensitive information cannot be traced back to individual women or vulnerable groups. These safeguards maintain public trust and legal compliance while allowing productive data sharing.

TOOL N DATA DICTIONARY AND METADATA FRAMEWORK

The Data Dictionary is a core component of this system. It provides field-level definitions for every variable in the data pipeline, including:

- Variable name and description
- Data type and permissible values
- Source and transformation logic
- Validation rules and error thresholds
- Ownership and update frequency

Having this document ensures that all institutions, including providers, supervisors, and data offices, speak the same data language. It is complemented by automated data-quality controls, including:

- Validation at registration: automatic checks such as verifying that “female + male = total” or that resolution dates follow complaint dates.
- Outlier detection: statistical methods (e.g. provider Z-scores, quarter-to-quarter variance flags) to identify unusual patterns that may signal reporting errors or emerging risks.
- Feedback loops: each quarter, providers receive a data quality report with pass or fail indicators and correction deadlines, turning data validation into a learning process.

To ensure interoperability, coding and identifiers are aligned with existing systems, such as NFIS dashboards, NFES reporting, national complaints taxonomies, and provider IDs, so that GSCP data integrate smoothly into existing governance frameworks.

By designing for quality at the start rather than correcting errors later, this system turns data collection from an administrative burden into a regulatory asset.

A Template is available in Annex 16.

11.3 Feedback Loops: From Data to Action, Monitoring, and Learning

Data only becomes meaningful when it influences decisions and feeds a structured monitoring and evaluation (M&E) process. For this reason, the GSCP framework embeds feedback loops that convert evidence into continuous improvement, ensuring that information moves seamlessly from providers to supervisors, from supervisors to policymakers, and from policymakers back to providers and the public. These loops form the backbone of the GSCP monitoring and evaluation cycle, transforming data into accountability and learning.

Periodic Performance Reviews (Taskforce level)

Every period, the GSCP Taskforce holds a review session where supervisors and data analysts jointly examine the Journey-Stage KPI Cards (Tool M). They identify outliers, assess trends against M&E indicators, discuss deviations from agreed targets, and agree on specific corrective actions such as sending supervisory letters, initiating onsite reviews, or requesting remedial plans from providers.

These sessions institutionalize evidence-based supervision within a formal monitoring framework, making oversight systematic rather than reactive. Outcomes from each review feed directly into the following period’s inspection plan, updates to the GSCP Dashboard, and revisions of annual M&E targets.

Annual GSCP Dashboard (Public reporting)

Once a year, the taskforce compiles an Annual GSCP Dashboard, which provides a concise, visual summary of progress by sex, provider type, and customer-journey stage. The dashboard highlights M&E indicators such as complaint-resolution times, fraud incidence, and financial health metrics, and pairs them with explanatory case studies showing how supervisory actions, such as introducing redress service-level standards or updating disclosure requirements, improved outcomes for consumers. Public dissemination of this dashboard serves three goals: monitoring progress, ensuring accountability by showing how regulators act on data, and building trust by demonstrating transparency and measurable improvements over time.

Thematic “After-Action” Reviews

Following major enforcement campaigns or systemic interventions, supervisors conduct After-Action Reviews as part of the M&E cycle. These structured assessments document what worked, what failed, and why — drawing lessons for future implementation. Findings are compiled into short technical notes and shared across the AFI network to support peer learning, benchmarking, and adaptive management. The insights also inform updates to indicators, templates, and supervisory priorities.

Rules-to-Practice Loop

The final layer of feedback ensures that evidence leads not only to accountability but also to regulatory evolution. Insights from complaints, inspections, and consumer surveys are systematically reviewed every 18 months as part of the GSCP M&E plan. These findings feed into updates of model clauses (Pillar I), product checklists (Pillar II), and supervisory protocols (Pillar IV), ensuring that rules remain relevant to new risks, technologies, and behavioral patterns. This “rules-to-practice” loop closes the M&E cycle, preventing stagnation and embedding learning into the DNA of consumer protection governance.

TOOL O **MONITORING AND EVALUATION (M&E) CYCLE MAP**

The M&E Cycle Map visually summarizes this process as a one page flow diagram:

Providers / Supervisory Data Warehouse / KPI Cards / Supervisory Actions / Public Dashboard / Policy Updates / New Provider Obligations / Providers

Each arrow represents a feedback channel where learning occurs, transforming GSCP into a living system that continually refines itself based on evidence.
A Template is available in Annex 17.

TOOL P **PUBLIC REPORTING FRAME**

The Public Reporting Frame structures the annual GSCP report in five core sections:

- Key Trends: headline progress and persistent gaps.
- Indicators by Journey Stage and Sex: entry, use, redress, exit.
- Actions Taken: supervisory measures, policy updates, enforcement campaigns.
- Observed Changes: measurable improvements in access, redress, or financial health.
- Next Priorities: planned reforms and data enhancements for the coming year.

Reports are written in clear, factual, and inclusive language, avoiding technical jargon, and are accompanied by accessible graphics that help consumers and stakeholders interpret progress. By showing both achievements and challenges, the public report builds credibility and encourages joint responsibility between regulators, providers, and consumers. Beyond expert audiences, key findings and data visualizations should also be adapted for use in public communication campaigns and financial education programs, so that women consumers can access, understand, and trust this information. Disseminating simplified insights through these channels strengthens transparency and reinforces confidence in formal financial systems, turning monitoring data into a practical tool for empowerment.

When information flows continuously from providers to regulators, from regulators to the public, and back again, GSCP becomes more than a compliance framework, evolving into a learning and accountability ecosystem that strengthens consumer confidence, improves institutional responsiveness, and advances women’s financial health over time.

A Template is available in Annex 18.

12 CONCLUSIONS AND CALL TO ACTION

12.1 The case for urgency

Financial inclusion of women today extends far beyond account ownership, it encompasses the capacity of consumers to use financial services safely, confidently, and to their own benefit. Yet, without robust protection, inclusion can inadvertently reproduce or even deepen inequality. Expanding access without addressing risks has already shown its limits as women may hold accounts but hesitate to use them, lack recourse when things go wrong, or disengage from formal systems after negative experiences.

This is where Gender-Sensitive Consumer Protection becomes indispensable. It is not an optional add-on but a core dimension of financial inclusion and financial health. By embedding GSCP principles into regulation, supervision, and provider practices, financial systems move from merely counting accounts to ensuring fair treatment, non-discrimination practices, transparency, and genuine trust in the marketplace for women.

Applying the customer-journey gender lens across entry, use, redress, and exit ensures that protections are not isolated rules but a coherent safety net. This perspective reveals where vulnerabilities accumulate, how risks differ by gender, and where the experience of consumers diverges from formal rights. Integrating GSCP throughout this journey strengthens financial health, defined as the ability to meet obligations, absorb shocks, and pursue personal and household goals of women.

The case for urgency is also economic. Evidence from the literature and the experience of AFI members shows that well-designed consumer protection increases confidence in digital channels, reduces fraud and complaint volumes, and stabilizes credit and savings behavior. For women, in particular, it builds pathways from basic access to meaningful participation in the financial sector, translating inclusion into empowerment. Without such protection, financial inclusion cannot be sustainable, equitable, or resilient.

12.2 What members can do next

AFI members already possess the foundations to act. The tools and approaches outlined in this report, based on the literature, survey insights, and workshop discussions, offer a practical roadmap for transforming commitments into implementation. The next steps fall into three interconnected domains: adoption, measurement, and collaboration.

1 Adopt the Four-Pillar GSCP Package

Members are encouraged to integrate the four GSCP pillars, Frameworks and Mandates, Market Conduct and Product Design, Data and Redress, and Supervision and Enforcement, into their existing national strategies. This does not require creating parallel structures; rather, it involves embedding gender responsiveness within ongoing reforms to financial inclusion, market conduct, and digital finance. Members can start by issuing clear mandates in consumer protection laws, aligning disclosure and product design rules with women's realities, standardizing sex-disaggregated data reporting, and incorporating gender indicators into risk-based supervision. Each of these steps moves the financial system closer to fairness and resilience.

2 Commit to Minimum GSCP Indicators and M&E

Tracking progress requires a shared evidence base. Members can begin by adopting a core set of GSCP indicators such as disclosure comprehension rates, complaint resolution times, digital fraud incidence, and key measures of financial health. These indicators should be disaggregated by sex and, where possible, by age, geography, or product type. Standardized reporting templates and supervisory dashboards will enable comparability across institutions and over time. Integrating these metrics into national monitoring and evaluation (M&E) frameworks transforms consumer protection from a compliance checklist into a performance-driven system that measures outcomes, not just activities.

3 | Engage in AFI Peer Learning and Collaboration

The AFI network provides a unique platform for peer exchange, capacity building, and shared innovation. Members can participate in thematic working groups, contribute to the development of GSCP case studies, and pilot new approaches such as gender-sensitive redress systems or financial health monitoring. Collaboration across jurisdictions accelerates learning and ensures that solutions are adapted to real regulatory capacities and local contexts. Members can also contribute data and insights to AFI's knowledge repository, strengthening collective evidence and visibility of gender-responsive policy progress. Importantly, this collaboration should be aligned with each country's National Financial Inclusion and Financial Education Strategies (NFIS/NFES), ensuring that peer learning and joint initiatives reinforce existing national priorities and governance frameworks rather than operate in parallel to them.

12.3 Looking Ahead

The agenda ahead is ambitious but achievable. GSCP offers a unifying framework that connects financial inclusion, financial education, market conduct, digital innovation, and gender equality into a single policy conversation. Implementing this vision requires persistence, partnerships, and political will, but the benefits are lasting, including stronger institutions, safer markets, and more confident, capable consumers. Ultimately, financial inclusion will only be complete when every woman can engage with the financial system on equal terms, without fear, confusion, or disadvantage, and when regulators have the tools, data, and authority to make that equality real.

For this transformation to be credible, a gender-sensitive approach must precede any formal GSCP framework. Without an underlying commitment to understanding how norms, biases, and contextual factors shape women's financial experiences, even a technically sound framework risks being perceived as superficial or compliance-oriented. Embedding a genuine, institution-wide orientation toward gendered risks and user realities is therefore essential to ensure that GSCP tools and rules are applied with intent rather than as a box-ticking exercise.

This report, together with the accompanying templates and tools, provides the foundation for that transformation. The next step is collective action, moving from commitments to measurable change, from access to accountability, from considering social norms and biases to transforming them, and from financial access in numbers to financial inclusion in practice.

ANNEX A. TABLES

Table A5.1. Respondents by region including institutional types

Region	Countries	# of Institutions	Types of institutions represented
Sub-Saharan Africa	Tanzania, Rwanda (2), Madagascar (2), Uganda, Lesotho	7	6 Central Banks, 1 Microfinance Regulator, 1 Treasury/MoF unit
South Asia	Maldives (2), Pakistan (2)	4	4 Central Banks / Monetary Authorities
Latin America & Caribbean	Peru, Honduras, Haiti	3	1 Central Banks, 2 Financial-sector Supervisor
Middle East & North Africa	Egypt, Jordan	2	2 Central Banks
Europe & Central Asia	Armenia	1	1 Central Bank
East Asia & Pacific	Fiji, Solomon Islands	2	2 Central Banks
TOTAL	16 countries	19 institutions	—

Table A5.2. Measures adopted

Institution Type	# of Institutions	Expected pattern in measures adopted (from survey trends)
Central Banks / Monetary Authorities	15	Highest adoption of data collection, complaint handling, financial literacy programs.
Financial-sector Supervisors	2	More likely to adopt market-conduct oversight, transparency rules, redress obligations.
Microfinance Regulator	1	Focus on microfinance consumer protection, less focus on general GSCP tools.
Treasury / Ministry of Finance	1	Focus on financial education and coordination, less focus on adoption of tools.

Table A5.3. Number of institutions implementing each regulatory measure

Regulatory Measure	# of Institutions IMPLEMENTING
Financial education and awareness programs tailored to women	10
Transparency in advertising and marketing with a gender lens	6
Fair treatment policies incorporating a gender lens	5
Anti-fraud policies addressing scams affecting women	4
Consumer credit reporting & disclosure protections	4
Digital security and online financial privacy protections	4
Regulation of high-risk lending practices	3
Privacy & data-protection rules addressing gender-specific risks	3
Consumer redress mechanisms tailored to women's customer journey	2
None (no measures in place)	4

Table A5.4. Sex-disaggregated data collected

Data Type	# of Institutions Collecting
Complaints and claims	10
Resolutions related to women's financial consumer protection	6
Women's financial inclusion — Access	10
Women's financial inclusion — Use	12
Financial literacy levels	9
Financial literacy program outcomes / impact	8
None of the above	3

Table A5.5. Support requested from AFI

Support Area	# Institutions Selecting This Option
Providing capacity-building and training programs	10
Sharing global best practices and case studies	8
Developing standardized regulatory tools	6
Facilitating cross-border collaboration	3
Providing guidance and research incorporating gender across consumer protection areas	7

TOOL A

ANNEX B.TOOLS

ANNEX 1. REGULATORY MANDATE MATRIX

PURPOSE: To map the current legal and institutional framework for Gender-Sensitive Consumer Protection, identify gaps, and assign responsibility for follow-up actions. Each row represents a key consumer-protection domain or customer-journey stage; each column records the presence of mandates, data obligations, and supervisory mechanisms.

Consumer Protection Element / Journey Stage	Legal or Regulatory Instruments	Gender-Sensitive Clause Present? (Y/N)	Operational Standard Defined? (Y/N)	Sex-Disaggregated Data Required? (Y/N)	Supervisory Test or Indicator Exists? (Y/N)	Lead / Co-Lead Institution(s)	Gap Description / Required Action	Priority Level (High / Medium / Low)	Timeline for Action (Q/Y)
Entry - Disclosures & Onboarding									
Use - Pricing Transparency & Agent Conduct									
Use - Data Protection & Digital Safety									
Redress - Complaint Handling & Alternative Dispute Resolution									
Exit - Account Closure & Switching									
Cross-cutting - Financial Literacy / Education									
Cross-cutting - Institutional Mandates & Coordination									

INSTRUCTIONS FOR USE:

Fill column 2 with all relevant instruments (laws, circulars, strategies).

1. Tick “Y/N” columns based on current provisions.
2. Describe the gap or next step (e.g., “no explicit gender clause in redress procedures” or “sex-disaggregated data not included in reporting template”).
3. Assign lead institutions responsible for amendment or development.
4. Set priority and timeline for follow-up (e.g., “High - Q2 2026”).

OUTPUT: The completed matrix becomes a snapshot of readiness, it is, a tool to track reforms across the four GSCP pillars.

ANNEX 2. GENDER-SENSITIVE PRODUCT CHECKLIST

PURPOSE: To assess whether financial products meet minimum usability, fairness, and accessibility standards for women and other potentially vulnerable users, at each stage of the customer journey.

USE: To be completed during new-product authorization, annual product reviews, or thematic inspections.

NOTE: This template is harmonized with Annexes 3 and 7; overlapping elements on disclosures, agent conduct, and gender-sensitive service have been aligned to avoid duplication and reduce reporting burden.

Customer-Journey Stage	Criterion / Test Item	Measurement or Evidence Required	Pass / Fail / N.A.	Supervisory Comments / Actions Required
Entry **Onboarding & Disclosure**	Product information presented in plain language and pre-tested with target users (≥ 80 % comprehension).	Copy of user-testing report; readability score; survey results.		
	Key Facts Statement provided before contract signing, in local language and accessible format (print / digital / audio).	Sample disclosure; confirmation of format distribution.		
	Disclosures available in simplified formats (visual, audio, or plain-language micro-scripts) and deliverable via USSD/SMS for users with low literacy or limited smartphone access.	Samples of simplified disclosure materials, delivery logs or system screenshots demonstrating that such formats are available and operational for low-literacy or low-connectivity users.		
	Identification requirements proportionate and non-discriminatory (alternative IDs accepted where legally possible).	Internal onboarding policy; list of accepted IDs.		
Use **Servicing, Pricing & Digital Conduct**	All mandatory fees, charges, and interest rates disclosed clearly before transaction.	Fee schedule; sample interface screenshots.		
	System allows user to verify transaction history easily (print / SMS / app).	User manual; interface demonstration.		
	Digital platform tested for privacy and usability on low-spec or shared devices.	Technical test report; accessibility review.		
	Mechanisms exist to prevent or respond to digital fraud and data misuse.	Fraud-monitoring protocol; consumer-notification plan.		
Redress **Complaints & Dispute Resolution**	At least two low-cost complaint channels available (e.g., hotline + branch).	Channel list; operating hours; accessibility audit.		
	Complaint acknowledgment within one business day; resolution within 30 days.	SLA log; complaint statistics.		
	Clients informed of right to escalate to independent ADR mechanism.	Disclosure script; sample customer communications.		
	Complaint data collected and reported by sex and channel.	Complaint register; SDD extract.		

Exit Closure, Switching & Debt Resolution	Account or product closure procedures clearly stated in contract and public website.	Contract sample; web link.
	No hidden or punitive fees for closure, switching, or early repayment.	Tariff sheet; customer notices.
	Clients can request balance certificate and data deletion confirmation.	Policy excerpt; sample client confirmation.
CROSS-CUTTING Consumer Empowerment & Monitoring	Provider tracks women's usage patterns (uptake, dormancy, complaints).	SDD reports; analytics dashboards.
	Provider participates in periodic GSCP capacity-building or reporting exercises.	Certificates; workshop attendance.
	Iterative behavioral testing conducted (repeated comprehension, A/B formats, nudges).	Test logs; simplified disclosure variants; user-feedback data.

Stage	# of Criteria Met	# of Criteria Assessed	Compliance Rate (%)	Overall Assessment (Satisfactory / Needs Improvement / Unsatisfactory)
Entry				
Use				
Redress				
Exit				
CROSS-CUTTING				
TOTAL				

INTERPRETATION GUIDE:

≥ 85 % = Product approved; minor follow-up only.

70–84 % = Conditional approval; corrective plan required.

< 70 % = Not compliant; resubmission after revision.

HOW IT WORKS IN PRACTICE:

Supervisors or authorization committees use this checklist to document compliance and transparency before approving a new financial product or during audits. The measurement column ensures decisions are evidence-based, while the Pass/Fail system makes the process transparent and replicable. Over time, aggregate results feed into sector-wide learning about which product types or providers systematically underperform on gender-sensitive criteria.

ANNEX 3. AGENT CONDUCT & SCRIPT STANDARDS

PURPOSE: To ensure that front-line agents and customer-service staff deliver transparent, respectful, and consistent service—especially to first-time or vulnerable consumers.

USE: To train, certify, and monitor agents through periodic audits or mystery-shopping exercises.

NOTE: This template is harmonized with Annexes 3 and 7; overlapping elements on disclosures, agent conduct, and gender-sensitive service have been aligned to avoid duplication and reduce reporting burden.

Domain	Standard / Expected Behavior	Objective Evidence Required	Compliance Check (Yes / No / N.A.)	Comments / Corrective Action
Professionalism & Respect	Greets clients politely, uses inclusive and non-patronizing language.	Observation / audio review.		
	Ensures privacy during discussion of financial matters.	Branch layout or digital setup verified.		
	Does not impose moral judgments.	Mystery-shopping notes / client feedback.		
Transparency of Information	Clearly discloses all fees, interest rates, and penalties before product acceptance.	Recorded explanation or checklist signed by client.		
	Uses approved Key Facts Statement; avoids verbal-only explanations for critical terms.	Copy of statement; signature log.		
	Reminds clients of right to receive written or digital confirmation of terms.	Client survey / sample documentation.		
Comprehension & Confirmation	Verifies client understanding using a brief comprehension question (e.g., “Can you tell me when the first payment is due?”).	Agent checklist / customer responses.		
	Offers to repeat or simplify explanations when confusion is evident.	Observation / training log.		
Complaint Handling & Redress	Explains clearly how and where to file a complaint.	Script adherence / call recording.		
	Provides or points to printed / digital complaint information.	Field inspection / branch materials.		
	Escalates unresolved issues following internal procedure within 48 hours.	Internal logs.		
Digital Conduct & Data Privacy	Never uses or stores a client’s PIN, password, or personal device.	Spot check / incident log.		
	Explains how client data are protected and how to report misuse or fraud.	Training quiz / customer survey.		
Gender Sensitivity	Recognizes and accommodates time, mobility, and literacy constraints.	Observation / scheduling records.		
	Ensures that women clients are treated with equal priority and respect; no gender-based assumptions.	Mystery-shopping results / feedback forms.		

Standardized Interaction Script (Illustrative)

Stage	Agent Line / Script Example	Purpose / Compliance Test
Greeting	"Good morning, my name is ___. I'm here to help you understand our services. Please take your time—if anything is unclear, I'll explain it again."	Establishes respect and psychological safety.
Disclosure	"Before you decide, let me show you this one-page summary of costs and conditions. These are the total fees, interest rate, and payment schedule. Do you have any questions?"	Ensures full disclosure and comprehension.
Confirmation	"To be sure everything is clear, could you please tell me in your own words when your first payment would be due?"	Verifies understanding.
Complaint Information	"If you ever have a problem or question, you can contact our help line at ___ or visit this office. You also have the right to escalate a complaint to the financial ombudsman if it's not resolved."	Embeds redress awareness.
Closure	"Would you like a printed or digital copy of your agreement and the complaint information sheet?"	Confirms informed consent and provides documentation.

Implementation Notes

INTEGRATION WITH PILLARS:

Pillar II (Market Conduct & Product Design): defines what agents must disclose and how.

Pillar IV (Supervision & Enforcement): uses this template for periodic mystery-shopping reviews.

Training use: The checklist doubles as a training rubric—new agents must demonstrate compliance in simulations before field deployment.

Data use: Compliance results feed into the supervisory dashboard (percentage of agents meeting all transparency and gender-sensitivity criteria).

ANNEX 4. SEX-DISAGGREGATED DATA (SDD) REPORTING TEMPLATE

PURPOSE: To ensure all financial service providers report consistent, comparable sex-disaggregated data across the four stages of the customer journey. The template allows regulators to detect bottlenecks and monitor differences in inclusion quality, use, and protection between women and men.

Provider Submission Form (to be submitted to the Market Conduct Authority)

CORE REPORTING SET – MINIMUM REQUIRED INDICATORS

To ensure comparability across members at different stages of data-system maturity, all providers must report at minimum the following four indicators disaggregated by sex:

1. Onboarding completion (Entry stage: new accounts opened, F/M).
2. Active account indicator (Use stage: active account rate, F/M).
3. Fraud incidence and reversals (Use stage: fraud cases and reimbursement rates, F/M).
4. Complaint resolution within SLA (Redress stage: % resolved ≤ 30 days, F/M).

These indicators constitute the baseline dataset required for supervisory dashboards and national GSCP scorecards, ensuring that all jurisdictions—regardless of system sophistication—can monitor core gender gaps in inclusion quality and consumer protection.

FULL REPORTING TEMPLATE: The following table presents the complete set of indicators that providers are encouraged to report as systems mature. The Core Reporting Set forms a subset of this full template.

Journey Stage	Indicator	Definition	Unit / Period	Female	Male	Other / Not Declared	Total	Change (Q-to-Q %)	Source / Validation	DATA QUALITY NOTES (Missing Data / Consistency Checks)
Entry	Number of new accounts opened	Total unique clients who completed onboarding this quarter	# / Q							
	Declined applications	Applications rejected due to incomplete ID / documentation	# / Q							
Use	Active account rate	% of accounts with ≥ 1 transaction per month	% / Q							
	Digital-payment usage	Clients who sent/received digital payments	# / Q							
	Fraud incidence	Reported cases of fraud or unauthorized use	# / Q							
	Fraud reversal rate	% of fraud cases reimbursed within SLA	% / Q							

Redress	Complaints received	All logged complaints, any channel	# / Q
	Complaints resolved within SLA (≤ 30 days)	% resolved within mandated timeframe	% / Q
	Satisfaction after resolution	% of complainants rating “satisfied” or higher	% / Q
Exit	Account closures	Accounts voluntarily closed by clients	# / Q
	Switching requests completed	Clients transferring to another provider	# / Q
	Debt-restructuring approvals	Clients receiving rescheduling / settlement	# / Q
MANDATORY QUALITY CHECKS	Missing Data Protocol	All blank fields must include a justification code (e.g., 0 = not collected; 1 = system limitation; 2 = provider error; 3 = not applicable).	
	Periodic Data-Quality Audit	Providers must submit a one-paragraph note describing internal data-quality checks performed.	
	Cross-System Consistency Check	Indicators must be reconciled with at least one other internal system (e.g., CBS, mobile-money platform, complaint system).	

VALIDATION: Automatic checks for totals, missing data, and consistency, complemented by periodic cross-system audits to ensure alignment with core reporting definitions.

USE: Feeds supervisory dashboards and national GSCP scorecards.

This makes gender-based inequalities visible in real time. When data reveal that women have lower onboarding completion or higher unresolved-complaint ratios, regulators can target inspections or technical assistance where the gaps actually occur.

ANNEX 5. REDRESS ACCESSIBILITY STANDARD

PURPOSE: To set measurable, service-level standards for complaint handling and dispute resolution, ensuring that redress systems are usable and fair for all consumers—especially women and low-income users.

Minimum Service-Level Requirements

Standard Area	Indicator / Requirement	Target / Benchmark	Verification Method	Status (Compliant / Partly / Not)	Comments / Actions
ACCESSIBILITY OF CHANNELS	At least two complaint channels available (e.g., branch + hotline / app / community kiosk).	≥ 2 channels functioning	Field audit / consumer survey		
	Channels accessible to low-literacy and low-connectivity users (e.g., voice, SMS).	≥ 1 alternative low-tech channel	Review of system design		
	A functioning USSD or SMS short-code must be available for lodging complaints in low-connectivity contexts.	Operational USSD/SMS channel available and functional 24/7.	System test + screenshot/ log of short-code activity.		
	A simplified complaint form (one-page or icon-based) must be available for low-literacy consumers.	Simplified form (one-page or icon-based) available across all entry channels.	Review of form sample + confirmation of distribution/use.		
	Providers using agent networks must demonstrate an assisted-complaint protocol for informal or semi-formal users.	Documented assisted-complaint process in all agent outlets.	Review of agent manual + field verification/interviews.		
TIMELINESS	Complaint acknowledgment	≤ 1 business day	Random sample check		
	Resolution timeframe	≤ 30 calendar days	Complaint-log audit		
TRANSPARENCY	Clients informed of complaint process at onboarding.	100 % of new customers	Documentation review		
	Clients informed of right to external ADR (ombudsman / mediator).	≥ 90 % of complainants aware	Post-case survey		

PRIVACY & DIGNITY	Procedures guarantee confidentiality for sensitive cases (e.g., harassment, coercion).	Policy clause present + training delivered	Policy review
FOLLOW-UP & REPORTING	Complaint data reported by sex and channel quarterly.	100 % of providers	SDD verification
	Redress performance published annually (aggregated).	Annual public report	Review of regulator website
DIGITAL & REMOTE INCLUSION	Complaint channels must function on mobile platforms and allow safe use on shared devices; agent-assisted submissions must follow privacy safeguards.	Mobile and shared-device accessibility demonstrated; agent protocols in place	Digital channel test / agent-process audit

This standard treats access to redress like any other regulated service—quantified, tracked, and enforced. Regulators can compare institutions objectively and publish an annual Redress Performance Dashboard, boosting accountability and public trust.

ANNEX 6. FINANCIAL AND DIGITAL LITERACY MICRO-MODULES

PURPOSE: To strengthen consumers' ability to understand, use, and benefit safely from financial services—focusing on critical moments along the customer journey. Each module is brief (10–15 minutes), adaptable to mobile, SMS, or community-workshop formats, and designed to be co-branded by regulators and providers.

Overview of Micro-Modules

Module	Customer-Journey Stage Targeted	Learning Objective	Core Messages / Activities	Delivery Channel(s)	Example Evaluation Metric
1. SAFE START	Entry	Understand key terms before signing up for a financial product.	• "Ask Before You Sign" checklist. • Short animation on reading a Key Facts Statement. • Exercise: identify hidden fees.	App, video, community workshop.	% of users who can identify correct fee after module.
2. SMART USE	Use	Manage day-to-day financial decisions responsibly and avoid over-indebtedness.	• "Small, planned decisions today prevent big financial problems tomorrow." • Budgeting mini-game: setting priorities between needs and wants. • Tips on planning for irregular income and building small savings buffers.	Community workshop, printed comic, radio vignette.	% of participants who report using a written or mental budget after 3 months.
3. YOUR RIGHTS	Redress	Know how and where to complain and escalate issues.	• Interactive map of complaint channels. • Role-play: explaining a problem to an agent. • Mini-quiz on timelines and ADR.	Hotline audio prompt, community radio.	% of users who can name ≥ 1 complaint channel.
4. CLEAN EXIT	Exit	Close or switch products safely and manage debt stress.	• Checklist for closing accounts / paying off loans. • Debt-restructuring examples. • Story: "María switches banks safely."	Leaflet, WhatsApp messages, women's cooperatives.	% of participants able to describe closure process correctly.

IMPLEMENTATION GUIDANCE:

Each module fits within 15 minutes and uses story-based learning to maintain engagement.

Content should be pre-tested with women in target segments (rural, low-literacy, MSME owners).

Providers can embed modules in onboarding apps or use them in CSR programs; regulators can require periodic participation reports.

Monitoring indicators (knowledge retention, behavior change) feed into Pillar III dashboards on empowerment.

INTUITION: By reinforcing comprehension and confidence exactly when consumers make or review financial decisions, these micro-modules turn knowledge into protection—reducing complaint volume, fraud exposure, and product misuse.

ANNEX 7. ON-SITE "GENDER TEST" MODULE

PURPOSE: To guide supervisors during on-site inspections and thematic reviews, ensuring that gender-sensitive consumer-protection requirements are verified consistently.

USE: Inspectors complete one sheet per institution or branch visit. Each question corresponds to a verifiable criterion linked to the four stages of the customer journey.

Note: This template is harmonized with Annexes 3 and 7; overlapping elements on disclosures, agent conduct, and gender-sensitive service have been aligned to avoid duplication and reduce reporting burden.

Customer-Journey Stage	Inspection Question / Test Item	Evidence Required (Document / Interview / Observation)	Compliant (Y/N)	Findings / Corrective Action
Entry **Onboarding & Disclosure**	Have disclosure materials been pre-tested with consumers (≥ 80 % comprehension demonstrated)?	Testing report, focus-group results, readability score.		
	Are disclosures available in the main local languages and accessible formats (print, digital, audio)?	Copies of materials, distribution list.		
	Do onboarding scripts explicitly explain complaint rights and channels?	Agent scripts / audio samples.		
Use **Servicing & Pricing**	Are all mandatory fees visible to clients before any transaction?	System screenshots, tariff posters.		
	Are transaction receipts or confirmations automatically issued (SMS, paper, or email)?	Random sample of receipts.		
Redress **Complaints Handling**	Are complaint logs coded by sex and channel?	Complaint register extract.		
	Are complaints acknowledged within one business day and resolved within 30 days?	Log timestamps.		
	Do clients receive written notice of the outcome and escalation options?	Sample correspondence.		
Exit **Closure & Switching**	Is the procedure for closing or switching accounts clearly communicated and free of hidden fees?	Contract sample, web capture.		
	Are debt-restructuring cases monitored for fairness and frequency by sex?	Portfolio analytics.		
CROSS-CUTTING	Does the provider regularly report SDD on use, complaints, and closures?	Quarterly submission evidence.		
	Has the provider designated a gender focal point for CP compliance?	Official appointment letter.		
	Are repeated deficiencies subject to predefined supervisory actions (e.g., corrective plans, sanctions, or enhanced monitoring)?	Supervisory policy / prior inspection records		

Scoring Summary

Stage	Items Met / Total	Compliance %	Rating (S / M / U)	Follow-Up Deadline
Entry				
Use				
Redress				
Exit				
TOTAL				

RATING KEY:
S - Satisfactory (≥ 85 %) M - Moderate (70-84 %) U - Unsatisfactory (< 70 %)

INTERPRETATION:
Scores feed into the supervisory dashboard and trigger thematic reviews when two or more institutions fall below 70 % on the same journey stage.

TOOL H2

ANNEX 7A. GSCP BASIC INSPECTION CHECKLIST

PURPOSE: To provide supervisors with a simplified, rapid-assessment tool to identify basic gender-sensitive consumer-protection gaps during field inspections. To be used in low-capacity environments or as an entry-level supervisory instrument before deploying the full On-Site Gender Test Module.

USE: Inspectors complete one sheet per institution or branch visit. Each question corresponds to a verifiable criterion linked to the four stages of the customer journey.

Journey Stage	Criterion / Test Item	Measurement or Evidence Required	Pass / Fail / N.A.	Key Findings / Corrective Action
Entry **Disclosure & Onboarding**	Key Facts Statement provided before contract signing and available in accessible formats.	Sample KFS in print/digital/audio form.		
	Disclosures pre-tested or adapted for low-literacy users.	User-testing summary or readability score.		
	ID requirements proportionate and non-discriminatory.	Onboarding policy or list of accepted IDs.		
Use **Servicing, Pricing & Digital Conduct**	Mandatory fees visibly disclosed before any transaction.	Fee schedule or screenshots.		
	Transaction history accessible through low-tech channels (SMS/USSD).	System screenshot or demo.		
	Basic digital-fraud prevention messages provided to users.	Sample SMS/USSD messages or posters.		
Redress **Complaints Handling**	At least one low-tech complaint channel available (USSD/SMS or hotline).	System test or channel list.		
	Complaint acknowledgment within required timeframe (e.g., 1 day).	Complaint-log timestamps.		
	Complaint records coded by sex.	Complaint register sample.		
Exit **Closure & Switching**	Procedures for closure/switching clearly communicated.	Contract excerpt or website capture.		
	No hidden or punitive fees identified at closure.	Tariff sheet or customer notices.		
CROSS-CUTTING	Provider submits basic SDD (Entry, Use, Redress, Exit).	SDD extract.		

TOOL H2

Scoring Summary

Stage	Items Met / Total	Compliance %	Rating (S / M / U)	Follow-Up Deadline
Entry				
Use				
Redress				
Exit				
TOTAL				

RATING KEY:
S - Satisfactory (≥ 85 %)   M - Moderate (70-84 %)   U - Unsatisfactory (< 70 %)

INTERPRETATION:
Scores feed into the supervisory dashboard and trigger thematic reviews when two or more institutions fall below 70 % on the same journey stage.

TOOL I

ANNEX 8. SUPERVISORY DASHBOARD SPECIFICATION

PURPOSE: To visualize real-time gender-sensitive market indicators drawn from provider reports and inspections.
USE: Maintained by the market-conduct authority; updated quarterly. It enables early detection of consumer-protection risks and supports evidence-based policy dialogue.

Dashboard Structure

Widget / Indicator Cluster	Key Indicators Displayed	Data Source(s)	Update Frequency	Alert Thresholds (R/A/G)	Linked Supervisory Action
Entry **Access & Onboarding**	• Account-opening completion rate (F/M) • Declined applications (F/M)	SDD template E; inspection reports	Quarterly	Red < 70 % female completion; Amber 70-84 %; Green ≥ 85 %	Provider notice → review of onboarding policy
Use **Servicing & Pricing**	• Active-account ratio (F/M) • Average fee burden (F/M) • Fraud incidence per 1 000 users (F/M)	SDD + fraud logs	Quarterly	Red = > 20 % gap between F/M rates	Thematic inspection on pricing / fraud
Redress **Complaints & Resolution**	• Complaint-resolution time (F/M) • % resolved ≤ 30 days (F/M) • Satisfaction score (F/M)	Redress standard F; provider reports	Quarterly	Red = > 10 pt gap or < 75 % resolution	Supervisory dialogue / enforcement
Exit **Closure & Debt Resolution**	• Account closures voluntary (F/M) • Switching requests completed (F/M) • Debt-restructuring approvals (F/M)	SDD + credit registry	Semi-annual	Red = female closure > male by > 5 pts	Review of exit procedures
CROSS-CUTTING - Financial Health	• Share of clients reporting ability to meet expenses (F/M) • Emergency-savings ratio (F/M) • Debt-stress indicator (F/M)	Demand-side survey / NFES	Annual	Red = decline > 5 pts YoY	Policy brief to NFIS committee
	• Retention rate (F/M) over 12 months • Sustained usage (transaction regularity; F/M) • Complaint-satisfaction outcome (F/M)	SDD template E + periodic user surveys	Annual	Red = persistent gender gaps >10 pts	Thematic review on product suitability / conduct practices
FOLLOW-UP & REPORTING	Repeated non-compliance with redress standards results in predefined supervisory actions.	Supervisory policy / prior inspection records	As requiered	Repeated red flags across two or more cycles	Trigger escalating enforcement actions (corrective plan > heightened supervision > sanctions)
	GSCP bulletins include simplified visuals and plain-language summaries to ensure accessibility for low-literacy users.	Public bulletin / communications team	Annual	Not aplicable	Requires coordination between supervision and communications units

INTUITION: The dashboard turns raw reporting into managerial intelligence. It enables supervisors to see where women's outcomes diverge from men's in real time—making protection measurable, comparable, and enforceable.

ANNEX 9. COORDINATION CHARTER FOR GSCP TASKFORCE

PURPOSE: To formalize coordination, clarify roles, and establish data-sharing and decision-making arrangements among institutions involved in implementing Gender-Sensitive Consumer Protection.

Section	Description / Example Content
1. MANDATE & OBJECTIVES	State the overall purpose: e.g., “Coordinate the implementation and monitoring of the GSCP Framework, ensuring coherence among regulatory, supervisory, data, and gender-policy bodies.”
2. MEMBERSHIP	List core and observer institutions (market-conduct regulator, central bank, DFS unit, gender ministry, data-protection authority, consumer ombudsman, national statistics office, etc.).
3. ROLES & RESPONSIBILITIES	Define the primary contribution of each member (e.g., data management, policy drafting, consumer engagement, supervision).
4. DECISION-MAKING RULES	Specify quorum, voting, and consensus mechanisms.
5. DATA-SHARING PROTOCOL	Identify what data are shared, periodicity, security measures, and legal basis.
6. CONFIDENTIALITY & PRIVACY	State safeguards consistent with national data-protection laws.
7. MEETING SCHEDULE	Minimum quarterly; extraordinary sessions as required.
8. SECRETARIAT & REPORTING	Identify the secretariat institution and required outputs (minutes, quarterly summary, progress tracker).
9. DURATION & REVIEW	Charter valid for 3 years; reviewed annually.
SIGNATURES	Chairs and institutional focal points.

This charter turns informal cooperation into a formal governance instrument, reducing duplication and ensuring continuity despite personnel changes.

ANNEX 10. GSCP WORKPLAN & BUDGET MATRIX

PURPOSE: To translate GSCP activities into quarterly deliverables with clear ownership, milestones, and financing.

Quarter	Activity / Output	Lead Agency	Supporting Agencies	Budget (USD)	Funding Source (Core / TA)	Milestone / Deliverable	Status (G/A/R)
Q1 2025	Approve Coordination Charter						
Q2 2025	Pilot SDD Template with 3 providers						
Q3 2025	Launch Redress Standard pilot						
Q4 2025	Develop Dashboard MVP						

COLOR KEY: On track Minor delay Critical.

INTUITION: This table doubles as the project-management tracker presented to the Taskforce each quarter.

ANNEX 11. RACI MATRIX FOR JOURNEY-STAGE COORDINATION

PURPOSE: To clarify who does what for each GSCP action across institutions.

Journey Stage / Task	Market-Conduct Reg.	DFS Unit	Data Office	Consumer Ombuds	Gender Ministry	Data-Protection Auth.	Other (Providers Assoc.)
PRE-IMPLEMENTATION FEASIBILITY REVIEW (staffing, IT, supervisory capacity)							
Entry **SDD Template Design**							
Entry **Provider Training on Disclosure Testing**							
Use **Digital Safety Protocol**							
Redress **SLA Standards**							
Exit **Switching Transparency Guidelines**							

LEGEND: R = Responsible A = Accountable C = Consulted I = Informed
The RACI makes coordination explicit and auditable; no task proceeds without a designated owner.

ANNEX 12. SEQUENCING PLANNER (3-YEAR GANTT)

PURPOSE: To visualize phasing, track timing, and align budgets and responsibilities.

Action / Deliverable	Owner	Budget (USD)	TA Source	Q1 2025	Q2 2025	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Q1 2027	Q2 2027	Q3 2027	Q4 2027	Status / Notes
Approve GSCP Charter																
Pilot SDD Template																
Launch Dashboard MVP																
Integrate Gender Test in Inspections																

This Gantt chart lets the GSCP Taskforce visualize progression quarter by quarter; it doubles as a donor coordination instrument.

ANNEX 13. GSCP COMPETENCY FRAMEWORK

PURPOSE: To define the knowledge, skills, and behaviors required for regulators and providers to implement GSCP effectively and sustainably.

Domain	Learning Outcomes (Examples)	Proficiency Levels	Assessment Tasks / Evidence
1. Gender & Behavioral Risk	Understand how norms and biases shape market outcomes; identify gendered risks in product design.	F / P / A	Case analysis of complaint patterns; design a corrective memo.
2. Digital & Data Protection	Apply privacy-by-design principles; detect gender-differentiated fraud patterns.	F / P / A	Simulated fraud-incident investigation; review of data logs.
3. Inspection & Evidence	Conduct interviews and file reviews focusing on user outcomes rather than checklist compliance.	F / P / A	On-site observation; audit complaint files.
4. Analysis & Visualization	Transform SDD into insights; build supervisory dashboards; interpret trends.	F / P / A	Construct a fraud or complaint heatmap.
5. Communication & Enforcement	Prepare gender-sensitive inspection reports; communicate sanctions clearly; present findings.	F / P / A	Deliver a briefing note; peer review.

LEVELS: F = Foundational – basic understanding; P = Practitioner – applies skills under supervision; A = Advanced – leads or trains others.

LEARNING RESOURCES:

- Short e-modules linked to GSCP Micro-Modules (Annex 6) for public-facing learning.
- Internal workshops aligned to the Gender Test (Annex 7) for inspectors.
- Peer-learning exchanges across AFI members.

This framework makes capacity measurable. It turns gender sensitivity from an aspiration into a professional competency with evidence of mastery.

ANNEX 14. GSCP INDICATOR REFERENCE SHEET

PURPOSE: To standardize definitions, formulas, data sources, disaggregation, targets, and supervisory uses for all GSCP indicators.

Indicator ID	Indicator Name	Definition / Formula	Disaggregation	Frequency	Data Source	Data Owner	Baseline	Target (Y1 / Y2 / Y3)	Alert Thresholds	Supervisory Action if Breached
E-1	Disclosure comprehension rate	% of test users recalling ≥ 4 of 5 key terms after reading the Key Facts Statement	Sex / region / provider	Annual	Provider pre-test surveys	Market-Conduct Regulator	65 %	80 % / 85 % / 90 %	< 70 %	Suspend product launch + require remediation
U-2	Pricing transparency index	Composite score (0–100) from mystery shopping on fee display and comparability	Sex / provider	Quarterly	Inspection module (Template 7)	MC Regulator	58	≥ 75 / 80 / 85	< 65	Follow-up inspection + provider notice
R-3	Complaints resolved within SLA (≤ 30 days)	# resolved within 30 days / total received × 100	Sex / channel	Quarterly	Provider reports / Dashboard	Ombuds / MC Reg.	70 %	80 / 85 / 90 %	< 75 %	Remediation plan + publish league table
R-4	Complaint satisfaction score	Average rating (1-5) from exit surveys	Sex / channel	Quarterly	Post-closure survey	Provider / Ombuds	3.5	4.0 / 4.2 / 4.5	< 3.5	Training on client handling
X-5	Timely voluntary closure rate	% of closure requests completed ≤ 7 days	Sex / product	Semi-annual	Provider reports	MC Regulator	68 %	80 / 85 / 90 %	< 70 %	Enforcement notice
FH-1	Ability to meet routine expenses	% reporting “can meet most months”	Sex / region	Annual	Demand-side survey	Statistics Office / NFIS Secretariat	55 %	↑ +10 pp by Y3	↓ > 3 pp	Review inclusion policies

This master sheet ensures that all indicators are defined and interpreted consistently, transforming disparate data into a coherent evidence system.

ANNEX 15. JOURNEY-STAGE KPI CARDS

PURPOSE: To summarize 3-5 Key Performance Indicators (KPIs) per customer-journey stage, each with clear thresholds and "if-then" supervisory triggers.

Stage	Indicator	Current Value (F/M)	Target	Threshold (Amber/Red)	Supervisory Trigger ("If … then …")	Next Action
Entry	Disclosure comprehension rate		≥ 80%	< 70% (Red)	If < 70% for two quarters → require remediation and product hold	Review testing guidelines
Use	Fraud incidence (per 10 000 users)		≤ 10	> 12 (Red)	If gap > 5 points → launch thematic inspection	Investigate agent conduct
Redress	Complaints resolved ≤ 30 days		≥ 85%	< 70% (Red)	If below target → supervisory letter + public disclosure	Follow-up in next quarter
Exit	Timely voluntary closure rate		≥ 85%	< 70% (Red)	If below threshold → plan to review switching process	Policy revision

KPI Cards make supervision actionable. Each indicator links to a trigger and an immediate next step.

ANNEX 16. DATA DICTIONARY & METADATA

PURPOSE: To guarantee consistent data capture, storage, validation, and interoperability across providers and supervisory systems. The table below presents some examples of variables.

Variable Name	Label / Description	Type	Permissible Values / Coding	Source	Transformation / Formula	Validation Rule	Owner
sex	Sex of consumer						
complaint_date	Date complaint received						
resolution_time_days	Days to resolve complaint						
fraud_cases	Confirmed fraud cases						

METADATA STRUCTURE:

- Dataset name, version, and extraction date
- Contact point and confidentiality level
- Audit trail (modification log)
- Retention and archival schedule

A strong data dictionary underpins credibility and comparability—turning raw returns into trusted evidence.

ANNEX 17. M&E CYCLE MAP

Purpose: To visualize the continuous flow of data, supervision, and learning in the GSCP system.
(This can be a figure or table—below is a table version.)

Step	Actor(s)	Process / Tool	Output	Timing	Use / Next Step
1	Providers	Submit quarterly SDD & redress data (Annex 4 & 5)	Raw returns	Quarterly	Feeds supervisory warehouse
2	Supervisory Data Team	Validate data (using Annex 16 rules)	Quality report	Quarterly	Feedback to providers
3	Taskforce / MC Regulator	Review Journey-Stage KPI Cards (Annex 15)	Performance summary	Quarterly	Set corrective actions
4	Supervision Department	Apply Gender Test Module (Annex 7)	Inspection report	Quarterly / As needed	Feed dashboard updates
5	Data Office / IT Unit	Update Dashboard (Annex 8)	Online dashboards	Quarterly	Publish internal alerts
6	Taskforce / Public Comms Unit	Prepare Annual GSCP Dashboard Report	Public report	Annual	Accountability + stakeholder feedback
7	Policy & Legal Unit	Incorporate lessons into rulebooks	Updated guidance	Every 18 months	Close the learning loop

The M&E Cycle ensures that evidence from supervision, data, and redress continuously informs policy and practice—creating an adaptive system rather than a static one.

ANNEX 18. PUBLIC REPORTING FRAME

PURPOSE: To ensure transparent, consistent, and balanced communication of GSCP outcomes to the public and stakeholders.

Section	Content Guidance	Example Indicators / Graphics	Responsible Unit
1. Executive Summary	Headline results and progress since last report. Focus on what changed.	Overall % improvement in complaint resolution time (F/M).	Taskforce Secretariat
2. Trends by Journey Stage	Present key indicators for Entry, Use, Redress, Exit.	Bar charts of female/male ratios; line charts of fraud trends.	Market-Conduct Reg.
3. What Actions We Took	Summarize supervisory responses and policy reforms.	Bullet list of inspections, rule updates, new templates.	Supervision Dept.
4. What Changed	Describe improvements or remaining gaps relative to baseline.	Before/after table showing SLA compliance → 15 points.	Data Office
5. Next Priorities	Identify planned actions for next year.	Upcoming survey module; new gender training.	Taskforce / NFIS Committee
6. Annexes	Technical notes and definitions.	Indicator Reference Sheet (Template 14).	Statistics Office

Public reporting transforms data into accountability. Showing both progress and gaps builds credibility, invites feedback, and keeps GSCP politically visible.

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