

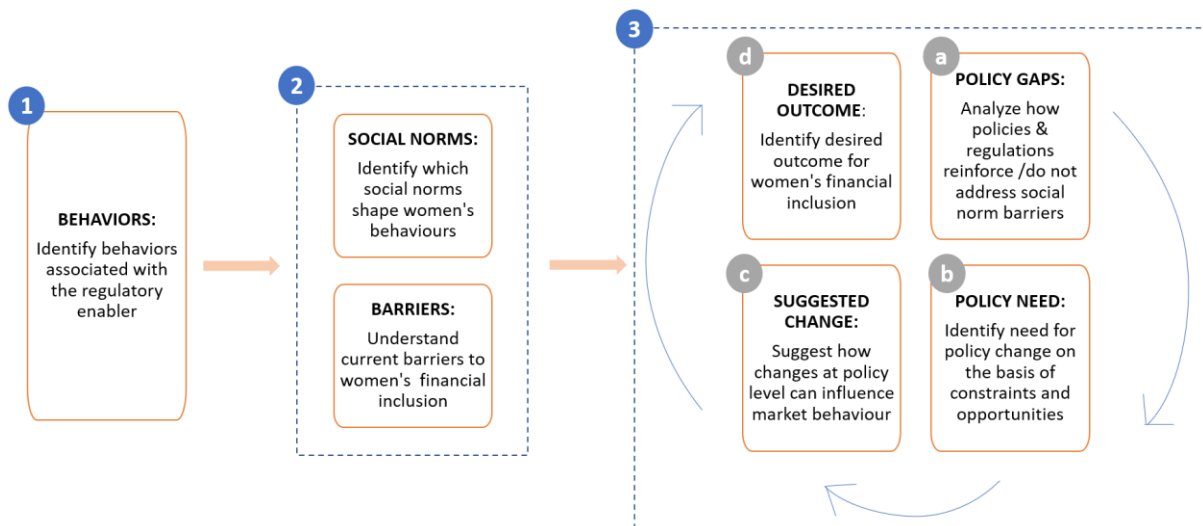
# Gendered Social Norms Affecting Digital Financial Inclusion in Ghana: A Quick Overview of the Most Promising Regulatory Responses

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This brief overview is designed to understand how gendered social norms in Ghana interplay with *perceived* gender-neutral financial sector policies and regulations that exert a discriminatory effect against women’s empowerment and their access to and use of financial services. It focuses on how social norms dampen the intended impacts of the policies, specifically the four key digital financial services (DFS) [regulatory enablers](#) (nonbank e-money issuance, use of agents, risk-based customer due diligence and consumer protection).

**CGAP proposes this analytical framework to understand the underlying reasons for women’s financial behavior and exclusion, considering gender norms:**



With this framework in mind, the authors identified the financial behaviors that women currently exhibit in the market and tracked associated social norms underlying such behaviors. The authors built an understanding of the gendered social norms that affect digital financial inclusion in Ghana, identifying the concrete social norm barriers that women face in the market.

Gendered social norms affecting digital financial inclusion in Ghana
1. Patriarchal kinship systems affecting power and gender relations, matrilineal in the South and patrilineal in the North
2. Limited roles in decision-making processes across the board, including in the control of income and financial resources
3. Imposition of household and childcare duties. Time poverty hinders women’s increased participation in the economy
4. Restrictions in access to education and financial and digital literacy
5. Discrimination against women of the LBGTI+ community, leading to the fear of being reported to the authorities by bank officials
6. Lack of financial independence over productive resources and assets

The authors then reviewed the past and current DFS regulatory framework in Ghana with a gender lens, considering the extent to which behaviors resulting from social norms are addressed through the incorporation of a gender lens in four DFS regulatory enablers (1. nonbank e-money issuance; 2. use of agents; 3. risk-based customer due diligence; and 4. consumer protection).

Based on this review, the authors proposed responses from the regulator to adapt certain policies and regulations to reduce the gender gap in uptake and use of digital financial services in Ghana.

**From recognizing barriers stemming from social norms to framing the most promising regulatory responses:**

Regulatory DFS Enabler	Women's financial behaviors	Relevant Social Norms)	Extent of incorporation of a gender lens	The most promising regulatory responses
<b>Nonbank E-Money Issuance</b>	Women struggle to open DFS accounts	1, 2, 3, 4	Medium	<ul style="list-style-type: none"> <li>• Pursue implementation of the six pillars of the DFS Policy to determine how to ensure a more gender-intentional policy, taking social norms fully into account</li> <li>• Collect new users' data and leverage existing data to understand market dynamics from a gender perspective</li> <li>• Monitor the impact that policies, guidelines and regulations can have on women</li> <li>• Encourage nonbank players in gathering information and sex-disaggregated data on customers' use of e-money services and support the development of gender-sensitive innovative low-cost products and services</li> </ul>
	Fewer women own mobile phones than men do	6		
	Women do not open DFS accounts due to time constraints	3		
	Women's poor digital and financial literacy levels limit their financial independence	2, 3, 4		
<b>Use of Agents</b>	Women in rural areas tend to interact less with agents than women in well-served areas	1, 2, 3	Medium	<ul style="list-style-type: none"> <li>• Address value proposition of female agents and promote their recruitment</li> <li>• Increase the effectiveness of agents by reviewing the interactions with customers</li> <li>• Adjust business experience to bring more women agents onboard and encourage trainings for women agents</li> <li>• Push forward the collection of reliable sex-disaggregated data</li> </ul>
	When selecting agents, women look primarily at proximity and personal relationship	4		
	Women do not aspire to become female agents	3		

<b>Risk-Based Customer Due Diligence</b>	Avoidance of travelling long distances to get an ID or biometric ID or other acceptable piece of identification required to open a banking account or buy a SIM card	3	Medium	<ul style="list-style-type: none"> <li>• Pursue the introduction of biometric ID cards</li> <li>• Improve the quality of services and qualification of agents in order to improve customer's service</li> <li>• Create a better understanding of the role that mobile technology can play in leveraging ID or birth registration ownership among low-income women</li> <li>• Explore other options than ID for lower tier accounts</li> <li>• Invest in increasing customers' safety against fraud</li> </ul>
	Hesitancy to engage in KYC processes	4, 5		
	Avoidance of integration in the Ghanaian identification ecosystem by low-income and illiterate women	4		
<b>Consumer Protection</b>	Socially disempowered women show low levels of confidence in dealing with technology-related products and services	1, 4	Low	<ul style="list-style-type: none"> <li>• Assess the gender-specific dimensions of financial consumer protection</li> <li>• Push for the creation of a gender-sensitive consumer protection framework for financial services</li> <li>• Oblige providers to take into account gender dimensions in the disclosure of fees</li> <li>• Reinforce data protection regimes</li> <li>• Adopt a consumer-centric approach in new consumer protection frameworks</li> </ul>
	Women are often not aware of e-money related risks	4		
	Women experience re-occurring cases of fraud	4		
	Women are less likely to understand their rights as a consumer and are less likely to advocate for their rights	1, 4		

### The path ahead: recommendations

In conclusion, the authors have four recommendations for policymakers and regulators:

1. Encourage the design and roll-out of user-friendly and affordable DFS that respond to women's evolving needs, considering how their financial behaviors are shaped by underlying social norms.
2. Introduce, or strengthen, measures to expand agent networks that facilitate outreach to women.
3. Establish a gender-sensitive consumer protection framework
4. Advance financial and digital literacy, with a gender lens.