CASE STORY ON GENDER DIMENSION OF AID FOR TRADE

Pro-poor Horticultural Export Value Chains in Egypt
DRAFT CASE STORY

GENDER MAINSTREAMING IN AID-FOR-TRADE (AfT)

“PRO-POOR HORTICULTURAL EXPORT VALUE CHAINS IN EGYPT”

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EXECUTIVE SUMMARY:

The Government of Egypt (GoE) has been committed to the mainstreaming of the gender dimension across a wide range of initiatives and activities, and has benefitted in particular by the patronage of this subject by the commitment of Egypt’s First Lady in that regard. This draft Case Story document was developed and submitted jointly by the United Nations Development Fund for Women (UNIFEM) and by the Government of Egypt’s Ministry of Trade and Industry, in response to the preparatory work by the International Trade Center (ITC), the World Trade Organization (WTO) and the Government of Rwanda, in light of the Joint Communication from the OECD and WTO Secretariats in July, 2010.\(^2\)

The issues addressed by this document reflect a concerted approach and decision to ‘gender mainstreaming’ within national projects classified as AfT. The objectives pursued by the example in this approach revolve around the upgrade of the skills, autonomous capabilities and incomes of women working within horticultural export value (value-adding supply) chains in geographically under-developed regions, in a manner which enhances the downstream value of exports by meeting more rigorous food safety standards and better segmentation of products. The approach taken aims to build a gender-sensitive trade capacity in agri–business. All participating organizations will also be eligible to seek a Gender Equity Seal (GES), a certification which signifies that an organization has met a multi-faceted training and audit process (described below).

The design and implementation of the specific AfT example herein was inclusive of a gender mainstreaming approach, in addition to women’s specific interventions from inception and remains so throughout implementation. Problems encountered so far with this approach have been manageable, but reflect the challenge of seamlessly integrating the gender dimension without changing the core focus of a more comprehensive AfT intervention.

Key Success Factors are assessed by proxy through the number of women who receive special training, within existing supply chains and measurably demonstrate an increase in incomes attributable to a premium for their new expertise, as well as the number of GES certifications that can be issued.

As the program is in the first third of its lifecycle, it is premature to fully declare results or lessons learned, although it is clear that mainstreaming from inception is far superior to an ‘add-on’ or ad hoc approach and that the GES presents a vehicle for further gender mainstreaming in AfT.

\(^2\) Document WT/COMTD/AFT/W/22, 26 July, 2010
1. **ISSUES ADDRESSED:**

   “Women, being deeply affected by poverty, also hold great potential to end it.”
   
   This quote perhaps best reflects the thrust of this Case Story and the issues addressed herein.

   In Egypt, and in other countries, women are the major engine of growth along the agribusiness value chain and the key to tangible income improvements. In horticultural value chain programming, despite the potential benefits of addressing gender inequities, analysis of gender issues is overlooked or added as an afterthought.

   This, despite the role that gender plays across the value chains in terms of shaping productive activities and the distribution of benefits, learning and ultimately opportunities for scaling, upgrading and innovation. From production to processing, gendered patterns of behavior condition the jobs and tasks of men and women, and ultimately—the linkages to productivity.

   A gender-based approach to carrying out horticultural value chain analysis provides an understanding of men’s and women’s access to productive resources and opportunities to add value, both as individuals and as group enterprises. Gender-based division of activities and, how the interaction between gender and power relations, regulations and trade impact the distribution of value along the value chain are all part of this analysis.

   A focus on gender however, does not preclude working directly with men as agents to realize economic opportunities and social change in a value chain. Rather, it allows for successful targeting, scale and maximum efficacy in the interventions undertaken by addressing both gender and power balances—ensuring that the benefits of value chain programs are equitably distributed.

   In contrast, when gender roles are not considered, productivity may suffer. A lack of resources and inability to manage risk results in women being slower to adopt new technologies and practices. That, in turn, slows down economic development – something Egypt is keen to avoid.

   Egypt’s recent economic growth has been quite positive, with per capita incomes doubling between 2004 and 2010, but the distribution of the development dividend has not been as geographically uniform as desired and addressing this challenge is an economic policy priority.

   In this Case Story (CS), the key issues addressed focus on describing the first concerted effort to implement Gender Mainstreaming in AfT in Egypt since the policy

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4 UNIFEM Statement for ‘World Poverty Day’ in 2007

was launched in a pilot phase. In that context, the planning process during the program design stages as well as the ‘mainstreaming’ of the gender dimension into the main program in a cross-cutting manner are a key focus of issues addressed in this CS, as well as the establishment of an accountability framework through the GES Auditing Framework.

Other issues include the objectives at the macro level (such as greater attention to the gender dimension in general), public policy strategies such as exploring how to boost gender-equity goals through public procurement incentives, and the more specific objectives for the horticultural project described herein (poverty alleviation, enhanced incomes and greater technical specialization) which is used as a vehicle to showcase the Egyptian case.

2. **Objectives Pursued:**

   At the national level, the GoE, in coordination with UNIFEM and funded by the World Bank launched a pilot process in 2007 to raise the profile of gender equity under what is known as the GES (Gender Equity Seal) program. One key aspect of the GoE’s work with UNIFEM on the GES, in particular with the Ministry of Investment, Ministry of Manpower and the National Council For Women, is to start the exploratory policy process on a trajectory that could lead to potentially providing incentives (such as preferences) to suppliers holding a valid GES certificate when bidding for government procurement contracts.

   It should be clear that this is not yet in place, but the policy thinking has evolved to a point where GES is being piloted in general terms, on a voluntary basis, so as to build experiences that could pave the way for GES being first a way to give preferences to such suppliers and perhaps eventually making it a formal requirement. A brief overview of GES in Egypt and its Audit Methodology is provided in the Annex to this document, but a summary of GES follows herein.

   The objective of GES is to develop, promote, and encourage gender equity in public and private-sector firms. More specifically, the aim is to institutionalize gender equity policies and facilitate equal opportunities for men and women in access to jobs, working conditions, as well as professional development, training, and participation in decision-making processes.

   The GES was defined with a management systems focus and seeks to enable
ongoing improvement and self-assessment, as well as the identification and lessening of gaps that may exist between men and women through the application of measures that favor equal opportunities.

Through a certification process based on technical support, training, social marketing, and establishing a Monitoring and Evaluation (M&E) system, the model also seeks to distinguish with a GES certification those organizations or institutions that support women’s rights and ensure gender equity through compliance and implementation of the model.

This model was designed to be applied to all types of organizations, regardless of their size, geographic location, or social and cultural conditions. Its purpose is to enrich and improve the working conditions of men and women through the visualization and elimination of discriminatory practices.

In order to be certified and granted with the GES, technical assistance will support each firm from the initiative to address gender equity issues identified during their self-assessment phase. This process includes training to address identified weaknesses, a pre-auditing test and then full auditing by an independent Certification Team.

The recommendation for receiving the seal (see the column on the right on the prior page) will proceed when compliance with the model’s requirements, in terms of its development and implementation, have been met.

Participation in the project by public and private firms will be strictly voluntary upon this invitation. The ‘seal’ is granted for 2 years; after the 2 years another auditing visit is conducted by the GES Team, to make sure that the firm and/or organization is improving and maintaining the minimum required equity policies ... in favorable cases, the seal is validity of the seal is renewed.

The added value that is gained by the adoption of the GES includes such varied benefits as: (i) the optimization of human resources to increase the organization’s efficiency and competitiveness, (ii) The promotion of good personal relationships in workplaces where men and women with different skills, perspectives, and working styles can contribute to reaching the organization’s goals and meeting their personal needs, (iii) the generation of greater commitment and loyalty by employees (both men and women) and finally (iv) allowing the public the means to differentiate participating firms/organisations’ products and services as being associated with a commitment to gender equity in the workplace through the use of the Gender Equity Seal.
Egypt’s Ministry of Investment, through the General Authority for Investment and Free Zones (GAFI) were the certifiers to the companies in the first phase that ended in March 2010, where 10 national companies from Egypt were certified. A National Gender Equity Committee (composed of the Ministry of Investment, the Ministry of Manpower, the GAFI and the National Council For Women and a Certifying Unit) had been established in the to provide support and issue the certification to the companies. The Ministry of Manpower has started a process to certify 45 companies in a manufacturing zone in Egypt with the GES.

At the CS program level with regards to the horticultural project example used herein, the specific objectives for gender mainstreaming are to (1) empower women within export supply chains, (2) to do that by making sure they add value to the supply chains in new and measurable ways which are also sustainable, and (3) to ensure that these interventions would result in a measurable improvements to the standards-of-living and role within their families and rural environments.

3. DESIGN AND IMPLEMENTATION:

In the autumn of 2008, the Government of Egypt (GoE) was invited to submit an application for a proposed programme in the “Development and the Private Sector” thematic window, as part of a competitive process under the United Nations (UN) Millennium Development Goals (MDG) Fund, supported by a generous grant from the Kingdom of Spain. It represented the first programme process where the GoE’s AfT gender mainstreaming goals were to be programmed, and from the outset, this was reflected in the process.

UNIFEM was invited by both the GoE and the UN Resident Coordinator (UNRC) to participate in the discussions from the onset, so that the proposal would evolve from the inception stages as inclusive of reflecting a gender dimension, but more specifically, in a seamless manner.

What emerged from this experience was that UNIFEM officers allowed a short-list of core AfT ideas to be developed for the programme concept separately, without making interventions in favor of or against any particular proposal. Once a short-list was established, UNIFEM began to work through the proposals to identify where a gender dimension could be distinctly identified in each case, then re-joined the other stakeholders to the
programme conceptualization phase to share their insights.

This process was repeated a few times until a core theme emerged, and very naturally embedded within the core theme was a gender dimension that was both distinct, and yet at the same time integral to the success of the whole core objective. In simple terms, the horticultural program aimed to help tackle poverty by focusing on linking the outputs of farmers in underprivileged and less-developed parts of Egypt with supply chains running through the more developed economic centers and onwards to export markets.

Using a Vulnerability Map which indexed regions of Egypt by the areas where poverty was at its most extreme, three geographical focus areas in rural areas were selected for the program at-large. Since the program’s conceptualization was collaborative, specific horticultural crops were selected directly because they depended heavily on the involvement of women to do key steps in the harvesting, handling, sorting and packing.

One reason why farmer’s outputs in these areas were not highly competitive is that the associations which manage the farms lacked technical know-how about how to better do the agro-industrial processes which add value, such as handling, sorting, packing, marketing and contracting. This was the intervention point where AfT could make a difference.

For the mainstreaming of the gender dimension, it was clear that if the women were taught how to carry out the handling, sorting and packing stages in a way that was compliant with international food safety and quality standards, such as GlobalGap and EurepGap, the supply chain would be a value chain, where product value (a premium in the marketplace) could be generated in these key stages.

If women were the primary actors in this part of the value chain, it would automatically have an impact on the demand for their services, especially in neighboring zones, as well as boost their relative importance to the whole system and, if carried out properly, to their incomes and standards-of-living.

As such, the design and implementation process revolves around this key element for gender mainstreaming. In keeping with the philosophy of GES, a non-discriminatory working environment would be developed not just because it is socially healthy, but because it is economically critical. This link of social and economic factors creates a sustainable approach to the implementation of GES long after the project’s interventions expire.
4. **Problems Encountered:**

From the application of the GES in Egypt since 2007, the following are expected challenges and risks that may arise; therefore, a risk-mitigation strategy is currently being explored:

- High rates of female illiteracy, especially in the earlier (upstream) stages of the value chain;
- Challenges to changing mindsets and ways of thinking;
- Cultural barriers;
- Institutionalization of the GES within the Organization.

5. **Factors for Success:**

Overall, it is clear that (1) the early involvement of specialized gender-focused organization at the conceptualization stage of AfT planning is critical, (2) the selection and design of a project concept must focus on the core AfT objective, but identify a ‘natural’ gender dimension which can be, in the best circumstances, ‘integral’ to the project’s success, (3) the formulation of an intervention logic must match the potential gender-equity enhancement skills accessible to the project with the actual needs of beneficiaries, especially with a view to the overall objectives and modalities for project operations. Other key success factors emerging from the GES pilot deployment in Egypt are the need for:

- Strong Political Will;
- Commitment from the Organization;
- Commitment from the Community;
- Identification of Male role-models to support ideological change.

6. **Results Achieved:**

In the first phase, ten companies were certified, with one of them in the Agri-business sector. This company actually received the highest points of the 10 certified companies in its audit. Another early result is the high interest of women in the target areas to learn the necessary technical skills required to make them able to add more value to their supply chains ... this ‘stakeholder’ interest is crucial to success: without it, the training process will not be as impacting.

Baseline studies currently underway indicate that results can be quick to achieve, but the challenge remains to channel gains back to their sources, including the women.

The next stage of efforts by UNIFEM and the GoE is targeted this period to create Results-
Based Outcomes though linkages between the Gender Equity Seal Certification Process and AfT in this CS example, such as:

- The SA 8000 Certifications and Management Systems developed by the Social Accountability International (SAI) as a global standard for Decent Working Conditions;
- Sustainability and or Integrated Reporting (GRI - Global Reporting Initiative);
- Ethical trading Initiatives;
- Fair Trade;
- ISO 22000 (Food Safety Management Standard);
- GlobalGap; (Good Agricultural Practices) and EurepGAP.

7. **LESSONS LEARNED:**

   The implementation of the first phase of GES, as well as the horticultural value chains project is that:

   - Public-Private Partnerships PPPs will work best in some countries;
   - Strengthening the capacity, resources and know-how to ensure that the implementation of gender equality policies is sustainable cannot be excluded as an intervention approach, tailored to each country and situational needs;
   - Ensure that the procedures, processes, resources, incentives and the actions within administrative processes are taking women's needs into account without disrupting the fabric of the AfT core objectives;
   - Translating “women's issues” into a matter of “public interest”;
   - Developing monitoring, evaluation and other accountability frameworks for gender equality policies, procedures, processes.

8. **CONCLUSION:**

   In the final analysis, three key highlights underscore Egypt’s Gender Mainstreaming approach to AfT: (1) The best streamlining occurs when a seamless integration of the objectives can be organized ... so early engagement is needed and must be part of the design process, (2) Realistic interventions must be organized in a visible way so that outcomes can be detected by beneficiaries (proximity and utility of results to the individual actors) and finally (3) positive externalities to men should be highlighted and linked to the success of women in any mainstreamed AfT process.
The Gender Equity SEAL

(Annex A- Egypt Case Study)
Although Labor laws in general recognize the equal rights of men and women, in daily life gender discrimination persists. The over-representation of women in occupations of lower social and economic scale, their limited opportunities for training and full-time work, the unequal distribution of family responsibilities, and gender stereotypes hinder their participation in management structures or higher-level positions, as well as in certain male-dominated professions. These factors, among others, generate inequity in the human resources. Therefore, it was deemed necessary to include the gender perspective and a culture of equity in private and public organizations, based on the possibility of women and men having access, on equal terms, to the production and distribution of goods and services. This way, women will have greater opportunities for professional development for the work they perform.

The Government of Egypt has agreed to participate in the United Nations Fund for Women (UNIFEM) Result Based Initiative to promote women’s access to employment, training and career advancement in private firms through the Gender Equity Model Egypt: “One Business Community…. Equal Opportunity” initiative. Seeking to promote women’s access to employment, training and career advancement in private firms, the Gender Equity SEAL in Egypt is modeled after the Mexico Gender Equity Project (Generosidad – Generosity) that produced very encouraging results. GES activities have been tailored to Egyptian needs and realities. The SEAL is an integrated process for firms who choose to establish gender equity in the labor place comprising four main steps: 1) self-assessment, 2) training, 3) auditing, and 4) evaluation. The application of this model, makes it possible to visualize the inequalities of men and women within an organization that are not perceived as gender inequity in order to establish strategically linked equity measures through affirmative actions, whereby these inequalities are corrected and a satisfactory work environment and more motivated staff are encouraged.

THE RATIONALE

- **The full participation of women and their active role in private sector development** is crucial for overall economic growth and development.

- **Low female labour participation imposes costs on the economy.** Over the past decade, many Arab Governments have invested many resources in the social sectors, such as health, education, and skills enhancement; that have particularly benefited women and produced a generation of young, healthy, and well-educated women with great potential and capacity to participate equally in labor markets. On the basis of efficiency alone, it is essential to tap and capture these under-utilized resources.

- **There is a strong correlation between women’s incomes and family welfare.** Empirical evidence at the household level in a number of countries has shown a strong correlation between an increase in women’s income or control over resources and greater expenditure on family welfare and children. Hence, the active participation of women in the public and private sector could lead to higher living standards for women, their children, and the family as a whole.

- **The principle of equality and its application constitute one of the fundamental rights** that are internationally recognized. Equity in the workplace should, therefore, be recognized as a basic principle and as a right in all countries.
Objective and Scope of the Gender Equity SEAL (GES)

The objective of this SEAL is to develop, promote, and encourage gender equity in public sector and private firms. More specifically, the aim is to institutionalize gender equity policies and facilitate equal opportunities for men and women in access to jobs, working conditions, as well as professional development, training, and participation in decision-making processes. The SEAL was defined with a management systems focus and seeks to enable ongoing improvement and self-assessment, as well as the identification and lessening of gaps that may exist between men and women through the application of measures that favor equal opportunities.

*Overall Development Goal*: To promote gender equity in employment and earnings and enhance the productivity of women in the labour force

**Impact 1** At *individual level*: Improved employment, earnings and working conditions for women

**Impact 2** At *Workplace Level*: Improved productivity and labor environment for both men and women in the workplace.

**Expected Outcomes**

**Social Marketing: Outcome 1**

Greater recognition of the benefits of promoting of gender equality among participating firms and organisations, non-participating firms and organizations who have expressed interest in participating, and by the wider business community

**Training: Outcome 2**

Enhanced capacity of the participating firm/organization/workers and employees to promote gender equity in human resources management.

**Technical Support: Outcome 3**

Improved use and enforcement of gender policies by the firm/organization

**Certification: Outcome 4**

Sustained compliance, and adherence to the Gender Equity Model (GEM) by the participating firms/organizations

**Process of Certification and its Benefits**

**Certification Process**

Through a certification process, the model also seeks to distinguish with a Gender Equity Seal those organizations or institutions that support women’s rights and ensure gender equity through compliance and implementation of the model. This model was designed to be applied to all types of organizations, regardless of their size, geographic location, or social and cultural conditions. Its purpose is to enrich and improve the working conditions of men and women through the visualization and elimination of discriminatory practices.
In order to be certified and granted with the Gender Equity Seal, Technical Assistance will support each firm from the initiative to address gender equity issues identified during their self-assessment phase. This process includes training to address identified weaknesses, a pre-auditing test and auditing by an independent Certification Team. The recommendation for receiving the seal will proceed when compliance with the model’s requirements, in terms of its development and implementation, have been met. Participation in the project by public and private firms will be strictly voluntary upon this invitation. The Seal will be granted for 2 years, and after the 2 years another auditing visit to be conducted by the Seal Team, to make sure that the firm/organization is improving and maintaining the equity policies, then the seal is validity of the seal is renewed.

GES: Value-added to Participating Firms

The value added that is offered by the adoption of the Gender Equity SEAL includes:

(i) The optimization of human resources to increase the organization’s efficiency and competitiveness.

(ii) The promotion of good personal relationships in workplaces where men and women with different skills, perspectives, and working styles can contribute to reaching the organization’s goals and meeting their personal needs.

(iii) The generation of greater commitment and loyalty by workers.

(iv) Allowing the public the means to differentiate participating firms/organisations’ products and services as being associated with a commitment to gender equity in the workplace through the use of the gender equity seal.

Each participating firm in this initiative will receive by the end of the below mentioned procedures a Seal to differentiate them from the rest of their competitors. The SEAL could be printed on the products or their corporate identity material. The participants will be receiving top quality technical assistance as well as tailored training modules. The next section is listing in detail the services provided through the initiative for each of the participants:

1. **Support to the firms/organizations to analyze their practices regarding gender equity, identify possible bias and propose an action plan to establish the GEM through:**

   a. *Provision of technical services to firms:* These services, to be provided by an external consulting firm, will include Preparation of a self-assessment on the state of gender equity in the organization; Preparation of an Action Plan to enhance strengths and address weaknesses identified in the self-diagnosis. It will also develop performance and monitoring indicators; Monitoring progress in implementation of Action Plan.

   b. *Training in areas identified by the Action Plan:* On the basis of the self-assessment, a tailor-made training program will be offered to the organization. Firms/Organizations will be offered the following training modules: practical importance of gender equity for organizations; good practice tools to promote gender equity in organizations (overview); recruitment; training; career development; prevention of harassment and enforcing a safe work environment.

   c. *Pre-audit and certification of gender equity.* After training has been completed, firms/organisations will undertake another self-assessment (a pre-audit) to ascertain whether they are ready to undergo a certification audit. If a firm/organization deems itself ready, an audit will be conducted by a seal team to determine whether it has reached the established goals for gender equity.
2. Gender Equity Seal
The firms/organizations that succeed in establishing the GEM will receive the Gender Equity Seal as recognition that they have established a gender equity approach in managing human resources. They will follow up their action plan for a year and then proceed to a final certification process by an external independent firm.

3. Public recognition of gender equity efforts by the participating firms and organizations.
A marketing and communication strategy will be developed in cooperation with the PR or the marketing agency in the case of Private Sector, or developed in cooperation with the organization in the case of the public sector. The Social Marketing Strategy and the action plan objective is to promote gender equity seal after the certification.
AUDITING FRAMEWORK OF THE GENDER EQUITY SEAL

(Annex B – Egypt Case Study)
The Auditing Grading is a no failure system that is graded according to the following:

For each action/policy described in the evaluation document, please mark the number (1 to 4) that most appropriately describes the situation within the firm. The following explains the meaning of each number:

1- **No Progress**: The action/policy has not been implemented within the firm; there is no evidence or documentation the action/policy.

2- **Underdeveloped and/or Not Implemented**: The action/policy has not been implemented; however, there is evidence or documentation that the policy/action is being developed.

3- **Implemented but Requires Improvement**: The action/policy has been implemented and documented but requires improvements and corrections in order to meet the requirements specified in the Gender Equity Seal. There is sufficient evidence that the action/policy is near completion.

4- **Completed and Efficient**: The action/policy has been implemented and documented; the action/policy has been evaluated internally by the gender equity committee and the committee has documented improvements in the firm; there is significant evidence that shows the completion of the requirements specified in the Gender Equity Seal.

What are the Organizations and the Firms are audited on?

A- The Planning: *(Policy on Gender Equity, Actions that Favor Gender Equality, Objectives, Organizational Goals,)* which is assessing the level corporate support for gender equality

- Political Will and Support of Higher Management
- Gender Equity Committee/Gender Coordinator with Decision Making Power established
- Periodic Reports to Higher Management on Performance
- Monitoring of Progress on Gender Equality Indicators

B- **Equal Opportunities and Compensation**, **Recruitment and Promotion**, and **Compatibility between work and home life for men and women** and that to ensure that all Women and men are treated fairly at work-respect and support human rights and non discrimination

- Recruitment Policy Clear, Anti-discrimination policies established
- Equal Treatment and Gender Neutral Selection Process (From announcement to hiring) enforced
- Equal opportunities in all levels of management and representation of the firm ensured
- Part time, Flexible, and hourly working systems encouraged
- Equal Pay for Equal Work (Policy and Application)
- Cost benefit analysis for childcares service
✓ Protections against personnel losing their position, title, or level of employment upon leaving for excused/recognized maternal or paternal purposes
✓ Maternal Leave Ensured

C- Health and Work Environment and Sexual Harassment: Ensure the health, safety and well being of all women and men workers
✓ Familiarity with the laws and codes for hygiene and safety in the work place
✓ Availability of the medical services within and outside the firm for workers
✓ Spelling out the different work and health-related risks for men and women and ways to prevent such risks
✓ Sexual Harassment Policy or Code of Ethics announced
✓ Confidentially and privacy of an employee’s harassment case are protected

D- Training, Self Development and Promotion: Promote education, training and professional development for women
✓ Equal Opportunities in training and Promotion
✓ Perception of Equal Opportunities by the All Employees
✓ Training programs conducted during office hours
✓ Equal Access to information
✓ Criteria for personal development and advancement clear and transparent within the firm
✓ Availability of intention or proactive measures by the Managers to develop women leaders in the firm
✓ Existence of Gender Neutral Performance Evaluation System
✓ Equal Opportunities for Informal Mentoring

E- Evaluation of Gender Equity Process in the Firm: Measure and publically report on progress to achieve gender equality
✓ Defined and documented the procedures for monitoring and evaluating the gender equity policy
✓ Team within the firm assigned to evaluate the execution of the gender equality plan
✓ Evaluations Results disseminated throughout the firm
✓ Firm work to better meet the demands of the gender equity policy and recommendations from the evaluation
✓ Established gender equality indicators so that the gender equity policies can be evaluated with respect to the objectives and goals outlined by the firm
✓ Top Management Procedures to Review the Gender Equity Policy and provided analysis for areas of improvement