Advancing Gender Diversity through Effective Anti-Harassment Mechanisms

CASE STUDY

HBL
Banking and Financial Services, Pakistan
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These five case studies were produced by the International Finance Corporation’s (IFC) Gender Secretariat in partnership with The Pakistan Business Council (PBC). They were developed under the overall guidance of Henriette Kolb, Global Manager, IFC Gender Secretariat, and Fuad Hashimi, Executive Director, PBC’s Centre of Excellence in Responsible Business (CERB). The core working group of this initiative comprised Rudaba Zehra Nasir, Sammar Essmat, and Yasmine Galal from IFC and Nazish Shekha and Sara Laig from CERB. Moreover, the case studies are part of IFC’s MAS Women’s Employment Program and would not have been possible without the guidance and support of many IFC colleagues, including Zunee Muhtashim, Farzin Mirmotahari, and Sanola Daley.

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Appreciations are also extended to the design and printing team at Groff Creative, including Jay and Lauren Groff, who, along with Fatima Fasih from PBC and Bhattiprolu B. Murti from IFC, were critical in producing this report.
Pakistan’s economy is presently growing at just under 6 percent annually. The country’s GDP could grow by 30 percent if women and men participated equally in the workforce. Women’s education levels in Pakistan have increased over time. Yet, only a quarter of women are working compared to over 80 percent of men. The gap is staggering and closing it represents a huge economic opportunity for Pakistan.

In addition to Pakistan’s economy, closing gender gaps is also good for Pakistan’s businesses. The competitiveness and growth of Pakistan’s firms could be significantly enhanced if firms could bring into their company diverse skills and talents, which are urgently needed to be more productive and innovative. Despite competition over attracting and retaining skilled employees, few companies have widened their search for talent and skills by tapping into Pakistan’s vastly underutilized female talent pool.

A 2017 study by The Pakistan Business Council’s (PBC) Centre of Excellence in Responsible Business (CERB) found that women represent less than 20 percent of the workforce of 90 percent of the surveyed PBC member firms. Although this is higher than the national average of less than 10 percent women in the formal, private sector workforce, in most cases, women continue to be underrepresented in formal employment and earn less than men for equivalent work. Pakistan’s private sector has a critical role to play in ensuring that women have access to more and better jobs.

A growing number of forward-looking Pakistani companies are now starting to see the business case for gender diversity, even in sectors considered non-traditional for women. To expand this awareness and turn it into action, IFC partnered with PBC to bring to Pakistan IFC’s global research and advisory expertise on the business case and good practices for advancing women’s employment.

These case studies are part of a series of initiatives that IFC and PBC have jointly led over the past year to mobilize more companies in Pakistan to increase gender diversity in their workforce. The aim of the case studies is to provide guidance to Pakistani firms on successful approaches for recruiting, retaining, and promoting more women and achieving better business outcomes.

The case studies feature five PBC member companies that are promoting greater inclusion of women in their workforce in five thematic areas: Artistic Milliners Limited for the Women in Business Leadership theme, HBL for the Anti-Sexual Harassment theme, Interloop Limited for the Women in Non-Traditional Roles theme, National Foods Limited for the Family-Friendly Policies theme, and Packages Limited for the Equal Opportunity Recruitment Practices theme. HBL and Packages are IFC investment clients and Artistic Milliners and Interloop are IFC advisory clients.

Our aim is that these case studies will reach many businesses in Pakistan and help them better understand the business case for women’s employment, get insights into the approaches that work, and learn from each other’s experiences while replicating solutions.

On behalf of IFC, I would like to thank the companies that participated in this project and generously shared their data and good practices, and PBC for their commitment to this important agenda. IFC is committed to working with the private sector in Pakistan to create equal employment opportunities, decent working conditions, and lucrative career paths for women, and we will continue to do more.

Nadeem A. Siddiqui
Senior Country Manager for Pakistan
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FOREWORD BY THE PAKISTAN BUSINESS COUNCIL

The Pakistan Business Council (PBC) is a business advocacy forum composed of the largest businesses including multinationals that have significant investment in and a long-term commitment to Pakistan. Members’ turnover represents 11% of Pakistan’s GDP and they contribute 25% of the taxes and exports. Our key advocacy thrust is on easing barriers for Pakistani businesses in the wake of progressive regional and global free trade, as well as improving national investment flows to match target GDP growth rates.

PBC works closely with the relevant government departments, ministries, regulators and institutions, as well as other stakeholders including professional bodies, to develop consensus on major issues which impact the conduct of business in and from Pakistan. It has submitted key position papers and recommendations to the government on legislation and other government policies affecting businesses. PBC also serves on various taskforces and committees of the Government of Pakistan as well as those of the State Bank of Pakistan, the Securities & Exchange Commission of Pakistan, and other regulators with the objective to provide policy assistance on new initiatives and reforms.

The Centre of Excellence in Responsible Business (CERB) is the first of PBC’s outreach initiatives to build capacity and capability of businesses in Pakistan. CERB’s vision is to assist Pakistani businesses to pursue long term sustainability and value creation, and its mission is to contribute towards inclusive social development. As part of its strategic objectives, CERB engages with businesses and industry leaders to provide a clear direction towards conducting responsible business in Pakistan. It leverages private sector growth as a means for development and poverty reduction taking guidance from the United Nations Sustainable Development Goals framework.

CERB’s aim is to identify and impart good practices from within the PBC member companies and work towards changing the mind-set of the many businesses that are not members of PBC but contribute equally to Pakistan’s economy.

In the context of gender equality, PBC is privileged to have partnered with the International Finance Corporation over the past year and, as part of our collaborative efforts to enhance women’s employment in Pakistan, we have together worked on five case studies where opportunities among domestically-owned companies to do so have been highlighted. On behalf of PBC, I would like to thank our member companies for allowing our respective teams to carry out in-depth analyses of their good practices in this area and sharing with us their data that may be published.

Ehsan Malik
CEO
The Pakistan Business Council
Case Study: Advancing Gender Diversity through Effective Anti-Harassment Mechanisms

WOMEN, WORK, AND SAFETY IN PAKISTAN

In Pakistan, although women’s education levels have increased considerably over time, only a quarter of women are working, compared to around 82 percent of men. A significant barrier to female labor force participation is the lack of safety, particularly women’s and their families’ perceptions about workplace safety. Unsafe workplaces, and related negative perceptions of safety, can be the result of disrespectful behavior, bullying, and harassment, including sexual harassment, which can make the workplace unpleasant, humiliating, intimidating, and inconducive to collaboration. This can have a negative impact on staff morale and it may contribute to low staff productivity and high employee turnover, ultimately hampering a company’s organizational and business performance. It can also affect a company’s broader reputation as an employer. Negative perceptions of workplace safety can deter women from applying to or staying employed in a company if there is a high risk of being exposed to harassment.

Pakistan’s Legal Precedent

Anti-sexual harassment has been addressed by Pakistan’s Protection against Harassment of Women in the Workplace Act 2010. The Act requires all organizations, public and private, to adopt an internal code of conduct aimed at establishing a safe working environment, free of abuse for all working women. The code defines sexual harassment and identifies how individuals are supposed to respond to complaints.

Methodology:
Information presented in this case study is based on HR data gathered and analyzed between October to November 2018 with HBL’s HR team as well as a focus group discussion with 5 employees and 3 one-on-one interviews with various female and male employees. This research was conducted by IFC Gender Secretariat in collaboration with PBC.


to behave in an organization. In addition, all organizations are required to set up a three-member inquiry committee to deal with cases of harassment within a 30-day timeframe. One committee member has to be a female employee. There is also a legal requirement that the code of conduct and the names of committee members must be displayed in a prominent place and in a language which all employees can understand. While the law is very comprehensive and presents a robust methodology of how to report and handle workplace sexual harassment, effective implementation requires mechanisms to propel the policy into action.

**Why is the Banking and Finance Sector Focusing on Women?**

Globally, research shows that a steadily increasing shortage of talent and skills has become an important discussion point in the banking and finance sector. The 2018 CEO Survey by PwC finds that 70 percent of CEOs in financial services around the world identify the limited availability of skills as a threat to growth. A study by Mercer suggests that the shortfall can only be met by tapping into the pool of female talent and that the continued growth of firms in both the developing and developed countries depends on getting and keeping more women in the workforce.

A growing number of companies in the banking and financial sector around the world now realize that there is a compelling business case for a gender-inclusive workforce. These companies are increasingly prioritizing diversity and inclusion in their recruitment and retention strategies to meet skill shortages at all levels of the organization, from entry-level to the board.

One way in which banks and financial institutions are advancing gender diversity is by making workplaces, including branches and interactions with customers, safe for women. In this sector, operations are organized at several levels from centralized head offices to bank branches over a large geographical spread. Successful banks and financial institutions ensure that their anti-harassment policies and supporting mechanism are tailored to their context and even address harassment which might be faced by and from clients and third-party contractors. Innovative solutions consider outreach to a geographically and sometimes culturally diverse workforce and ensure that the complaints procedure is accessible and accountable at all levels of the organization and in all settings.

**HBL: COMPANY OVERVIEW**

HBL was established in 1941 and moved its operations to Pakistan in 1947, becoming the first commercial bank in the country. Over the years, HBL has grown and maintained its position as the largest private sector bank in Pakistan, employing 17,083 employees throughout its network, with a global presence in 16 countries and more than USD 18 billion in deposits. HBL recognizes that to maintain its position as a market leader, it will need to continue prioritizing gender diversity and nurturing
perceptions of safety across its over 1,750 branches, even in the country’s remotest areas.

HBL’S BUSINESS CONTEXT FOR CREATING SAFE WORKPLACES

In Pakistan, only 3 percent of women have a bank account. This is an untapped market opportunity and large customer base for the banking sector.⁸ To reach this underserved female customer segment, HBL has developed HBL Nisa, a banking product which specifically targets women. When HBL set out to promote HBL Nisa to female customers, it faced a major challenge. HBL’s female staff were in a better position to engage with and understand the needs of female customers yet there were far less female staff than there were male staff at HBL.

HBL realized that reaching under-banked female customers was a compelling business opportunity. But doing so required HBL to set goals and increase workforce gender diversity.⁹ Pillars of HBL’s gender diversity strategy include:

- **Increasing the share of women in HBL’s workforce.** HBL set a goal to increase the share of women in the workforce from 15 percent in 2017 to 20 percent by 2020.

- **Introducing company polices that reduce entry barriers for women and create a safe and respectful work environment.** Amongst several HR policies that were introduced, an anti-harassment policy was identified by the bank as a priority.

- **Reducing gender bias through dedicated training and awareness raising.** HBL also realized that it needed to sensitize employees and help them address potential conscious or unconscious gender biases that they may hold so that they can better connect with female customers as well as existing and incoming female employees.

- **Introducing the Women@HBL platform for women to interact cross-functionally and with their HR Relationship Managers.** It also highlights inspiring women at HBL and provides them a platform to make their stories heard.

- **Creating the Diversity Council with a dedicated focus on HBL’s gender diversity strategy.** The council has representation from top management who aim to integrate gender diversity into the business strategy and goals and communicate those throughout the bank.

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⁸ IFC. 2017. Gender Intelligence for Banks—Moving the Needle on Gender Equality. Available at https://www.ifc.org/wps/wcm/connect/31b2d0e6-5908-4449-b2d6-9dcd66416bba/HBL+Gender+Intelligence+Report_final.pdf?MOD=AJPERES.

⁹ Ibid.
HBL’S EFFORTS TO CREATE A SAFE WORKPLACE

In Pakistan, the Protection Against Harassment of Women in the Workplace Act 2010 provides companies with strong guidance on the basic requirements of an anti-harassment company policy. International good practices, as outlined in IFC’s 2016 SheWorks report, point to effective mechanisms that need to be put in place by companies to operationalize the policy. HBL’s Anti-Harassment Policy covers staff at all levels of the organization, including in bank branches as well as individual and external service providers affiliated with the bank. The key elements of HBL’s policy and implementation mechanisms are aligned with international good practice.

1. **Strongly worded policy statement:** HBL’s Anti-Harassment Policy, which was introduced in 2010, covers and defines both harassment and sexual harassment. It also provides the parameters which need to be considered for triggering disciplinary action. The policy has been integrated with the Employee Code of Ethics and Business Conduct and the staff rules. To ensure transparency and easy access, the policy is available on the company’s intranet for all internal stakeholders. An abridged version of the policy is available on the bank's website for external stakeholders.

2. **Well-established complaints procedure:** Employees have various avenues of reporting harassment, both as victims or witnesses. ‘Speak Up’ is an email address managed by the bank’s Human Resource Department. Any complaints received are passed on for further action to the Disciplinary Action department or the Anti Harassment Inquiry Committee depending on the type of complaint. The Inquiry Committee and the team involved in handling harassment cases have been trained in relevant procedures. In addition, the bank’s HR helpline, which is generally used to report on day to day HR issues, can be used for receiving guidance on addressing harassment-related issues or to submit complaints. Another channel is the HR Relationship Manager, with whom staff can discuss an incident or complaint. Finally, as per the bank’s Whistle Blowing Policy, employees have the option to report incidents anonymously to the bank’s Compliance Department, which are then routed to HR.

3. **Clearly defined consequences and remediation:** HBL has a zero-tolerance policy in relation to harassment and have identified avenues of strict disciplinary action in line with the HBL Staff Rules. Such disciplinary action comprises a broad range of options, including termination of the harasser.

“You want a safe and secure place where you are respected and your focus is on doing the best work you can do, you are able to do, and not on trying to protect yourself. The Anti-Harassment Policy gives you that peace of mind.”

Female Manager, HBL
Employees who witness harassment are encouraged to report the incident or case and are rewarded if the case is proven.

4. **Training and awareness raising**: Employees receive information about HBL’s Anti-Harassment Policy at their orientation at HBL. They are also required to complete the bank’s mandatory e-learning module on anti-harassment. The bank’s anti-harassment training is developed by HBL’s Learning and Development team. So far, over 13,000 employees have completed the e-learning.

In addition to introducing and strengthening its Anti-Harassment Policy, HBL also introduced a Gender Intelligence Training Program, for all employees. Developed jointly by HBL and IFC, the mandatory HBL Gender Intelligence Training Program was launched as a tool to eliminate gender imbalances by promoting gender awareness and encouraging behavioral change. Training sought to help employees understand the business case for increasing the percentage of women in the workplace and as customers, to communicate HBL women’s market value proposition, and to encourage front-line staff to cater to the women’s segment. Since January 2016, more than 5,000 employees have been trained.

**BUSINESS IMPACTS OF CREATING A SAFE WORKPLACE**

**Recruitment and Retention**

Through discussions with staff, HBL has learned that its Anti-Harassment Policy contributes to its overall gender diversity goal and targets by enhancing perceptions of safety and security. It gives female (and male) employees the peace of mind that they need to be productive and present at work.

As a result of this and a range of other efforts, HBL has been successfully recruiting more women into new roles within the bank. This has led to a steady increase in the share of women from 12.6 percent in 2015 to 15 percent in 2017.
Increase in Female Customer Base

A review of HBL’s Gender Intelligence Training Program conducted jointly by IFC and HBL revealed that the training has led to a measurable increase in awareness of gender diversity amongst trained staff. This has translated into improved perception of equal workplace performance capacity between women and men and enhanced women’s confidence to apply for the next grade position. Moreover, as a result of the gender ‘intelligence’ of trained branch managers and employees, the number of women-owned deposit accounts increased by 6.7 percent, while the volume of deposits from women-owned accounts increased by 10 percent.¹⁰

Reputation

HBL collaborated with the NGOs AASHA and Mehergarh for the implementation of and compliance with the country’s Protection Against Harassment of Women at Workplace Act 2010. HBL is also registered on AASHA’s website as an organization that is committed to improving the working environment. HBL has also been marked as a “Gender Friendly Organization” on the Sexual Harassment Watch forum.¹¹

WHAT’S NEXT FOR HBL?

HBL recognizes that ensuring the effectiveness of its Anti-Harassment Policy requires continuous and sustained effort as well as ongoing training, awareness-raising, monitoring, and evaluation to make the policy better. Moving forward, HBL has prioritized the following actions to further improve its anti-harassment mechanisms.

1. Train all branch managers and staff across over 1,750 branches on anti-harassment. HBL has set several targets for diversity and inclusion. In accordance with its targets, HBL has an active management strategy focused on training and awareness of the mechanisms

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in place to discourage harassment. While ensuring a bank-wide safe and secure environment will continue to be challenging due to its diverse locations, HBL has a strategy in place to ensure the same culture exists across all its offices and branches.

2. Shorten HBL’s e-learning module on anti-harassment to allow staff to complete this training in a fast-paced work environment.

3. Enable and support more employees to report harassment and other issues using technology (emails, intranet, and other options), especially employees who are not comfortable with technology. HBL aims to continue expanding its outreach through training and awareness.

4. Develop a Gender Diversity Policy that supports and enhances HBL’s Anti-Harassment Policy and allows the bank to sharpen its focus on increasing the share of women in the bank’s workforce.

“It effects your efficiency; if that kind of a situation happens in your department then it becomes very difficult to focus on your work and be productive. Managers have an important role to play in recognizing, preventing, and addressing harassment of all kinds.”

Male Manager, HBL
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