Jens Kromann Kristensen,
Head of the PEFA Secretariat

Via e-mail: jkristensen@pefa.org

13 March 2019

Dear Jens,

**PFW (Public Finance by Women) response to the PEFA Gender Module Consultation**

We are pleased to submit a response to the PEFA gender module consultation.

PFW is a new organisation focused on creating the first global network for women working in the field of public finance to improve career chances and opportunities for women. Our vision is to develop a dynamic network for women with the inclusion and engagement of the wider public financial management community that will support an exchange of ideas and good practices, provide mentoring and peer support and promote gender equality through thought leadership and research. To find out more about PFW we have attached our recently published strategy.

We believe that whilst supporting women to fulfil their potential is vital, engendering public finance is of equal importance. In our experience no public policy is gender neutral yet, which calls for the need for policy to be scrutinized through a gender lens. In many countries there is still a lot of work to do to convince stakeholders that existing policies are not gender neutral. Women have a positive role to play in being involved in the public policy decision-making process to ensure that policies meet the needs of women and men equally. Delivering global commitments towards gender equality, such as SDG 5, requires positively including a gender perspective across the full policy framework and budget of a country and therefore we welcome the PEFA initiative.

In our view a collaborative effort is needed between all organisations involved in government, both in the public and private sectors, to ensure that the right solutions are developed to address the tangible and intangible barriers that exist, whether these relate to the political system, perceptions or unconscious biases and whether they are based on cultural or social norms. With this in mind we believe that the PEFA gender module for assessing countries’ performance on improving gender responsiveness is a positive step forward and has the potential to make a material contribution to improving gender responsiveness of
countries’ public financial management systems. It complements other initiatives in this area, such as those of the IMF and OECD.

We agree with the overall approach to pilot the gender module in different country contexts and administrative structures so as to test out the robustness of the methodology. But whilst we also agree that the application of the gender module should be discretionary we would recommend that it be promoted widely as good practice to countries seeking to test it so that they obtain a comprehensive picture of the robustness of their public financial management processes.

In our view the 31 detailed questions adequately cover all stages of the budget cycle, policy formulation, execution, accounting and reporting, and audit and scrutiny processes. However, we would just like to draw your attention to two points below.

Question 6: Performance audits. We would make the wording more specific so that it better explains whether gender equality has been mainstreamed into the methodologies for conducting performance audits. This would be helpful in indicating that some consistency has been applied in assessing the impacts of gender equality across all relevant service and policy performance audits.

Question 21: Accounting and Reporting. Whilst agreeing that disaggregated financial data by gender should appear in the financial statements, we think the question could be expanded further to include non-financial data on performance. The latter form of reporting should be encouraged and promoted by PEFA. The types of information and indicators that could be looked for could include for example, percentage of recruitment, retention, promotion, training, and redundancy, equal pay review, percentage of women in management, trends in pay grade and other diversity indicators. In our view this would help improve the overall evaluation of gender responsiveness of countries.

We hope that the above is helpful and should you require further clarification do not hesitate to contact Barbara Grunewald or I (co-founders of PFW).

Yours sincerely,

Gillian Fawcett and Barbara Grunewald

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