GUIDANCE NOTE
Gender Equality, Diversity (GED) & Integrity
APRIL 2023
GUIDANCE NOTE

Gender Equality, Diversity (GED) & Integrity

APRIL 2023
# Table of Contents

Gender Equality and Diversity in the context of Anti-Corruption and Integrity Promotion Efforts in Customs  

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Gender &amp; integrity: myths &amp; pre-conceived ideas</td>
<td>6</td>
</tr>
<tr>
<td>2. Integrating a gender perspective in Customs’ fight against corruption, relying on the WCO Revised Arusha Declaration</td>
<td>6</td>
</tr>
<tr>
<td>3. Gender mainstreaming &amp; inclusion in management of integrity projects</td>
<td>10</td>
</tr>
<tr>
<td>4. Implementing gender equality and diversity in project stakeholder engagement</td>
<td>15</td>
</tr>
<tr>
<td>5. Using gender sensitive &amp; inclusive language in talking about Integrity</td>
<td>16</td>
</tr>
<tr>
<td>5.1. Language</td>
<td>16</td>
</tr>
<tr>
<td>5.2. Images and stereotypes</td>
<td>19</td>
</tr>
<tr>
<td>6. Looking to the future</td>
<td>19</td>
</tr>
</tbody>
</table>
Corruption and gender inequality are in many ways closely connected. Men and women are affected by corruption in different ways, and are subjects and objects of different corrupt practices and behaviors.

However women, along with other disadvantaged groups in society, are often proportionally more vulnerable to corruption, especially at the borders. The impact of corruption on women can be more severe and linked to physical harm (sexual harassment, gender-based violence).

Aside from the disproportionate impact of corruption on women, there is also evidence that suggests gender may play a specific role in addressing corruption. Understanding gender-based power relations and inequalities can improve the design of governance and anti-corruption interventions.
Women are less corrupt
There is no evidence showing that women in leadership positions are inherently less corrupt than men. Other factors such as the political and institutional context, culture and gender inequalities can explain the linkages between female representation and levels of corruption.

...Corruption is a function of opportunity and not of gender!

Women experience corruption differently than men
When engaging in corruption, women are also significantly less aggressive in the amount they extract than their male counterparts. Women appear to be more vulnerable to punishment and the risks involved in corruption due to explicit or implicit gender discrimination.

Women have less opportunities to be corrupt
Integrity may be more a function of opportunity rather than gender. As women lack access to resources, they may also be less targeted by demands for bribes and less likely to indulge in corrupt transactions.

Men and women are subject to the same type of corruption
Women are less involved in bribery by monetary exchange as a form of corruption. Women are more subject to be victims of sexual assault as a form of bribery.
Corruption has an impact on gender equality

Gender inequality breeds corruption and vice versa: corruption tends to exacerbate gender inequalities. Although women tend to condemn corrupt behaviour more than men, they report corruption less often than men, because they are more afraid of the consequences.

Addressing gender in anti-corruption policies makes sense from an economic and development perspective.
2. Integrating a gender perspective in relying on the WCO Revised Arusha Declaration

WCO Members already are taking action to include a gender perspective to key factors of the WCO Revised Arusha Declaration:

**Leadership & Commitment**
- Strong commitment to gender equality from senior management.
- Women and men are represented in key positions throughout the administration.
- Acknowledgement of the gender imbalance in decision-making positions.
- Establishment of mentoring and/or career development programmes for the underrepresented gender.
- Appointing women in non-stereotypical positions within the organization such as in enforcement.
- Offer leadership training for both men and women.
- Install a “town hall” culture to enable all employees to ask questions and engage with all ranks of leadership.

**Transparency**
- Equal access to information: policies and procedures are available online.
- Legally mandated bans on discrimination & safe and accessible complaints mechanism available.
- Ensuring female stakeholders have access to information on Customs policies and procedures (including through proactive collaboration with women business associations).
- Carry out training and workshops on Customs policies and procedures for all stakeholders, including targeted training for women cross border traders.
- User-friendly platforms such as special chats on popular social networks in which traders can ask questions and file complaints regarding corruption, misconduct or malpractice.

**Human Resource Management**
- Equal opportunities with regards to career development & training.
- Written HRM policies that clearly outline recruitment, promotion and salary regulations.
- Recruitment and promotion based on merit.
- Equal rules on penalization.
- Highlight the underrepresented gender or group participation in job applications, interviews and recruitment advertisement for new positions.
- Importance to measure the effectiveness of GED measures in employment & career development.
- Commitment to recruit a diverse workforce using a data-driven approach.
- Develop strategic partnerships with universities that will help the administration to recruit a diverse workforce.
Customs’ fight against corruption, Declaration

Morale & Organizational Culture
- Regular training on Integrity & Ethics for ALL staff.
- Integrity awareness programmes in place.
- Regular employee satisfaction surveys.
- Champions working to support women and minority groups such as persons with disabilities in the administrations.
- Integrity Focal Point persons to champion integrity messages.
- Elimination of systemic barriers related to gender through flexible hours, telework agreements, special working arrangements, organization of working time.

Relationship with the Private Sector
- Agreements with the government agencies and private sector associations aiming to promote a more equal share of women and men at the executive level of corporate governance across the country.
- Consultations with stakeholders including women cross border traders.
- Access to safe complaints mechanisms.
- Ensuring female stakeholders have access to information on Customs policies and procedures through collaboration with women business associations.
- Carry out training and workshops on Customs policies and procedures for all stakeholders, especially women traders.

Code of Conduct
- Code of Conduct mentions ban on discrimination and gender equality related issues such as ban against gender based violence and sexual harassment.
- Gender Equality Action Plan in place.
- Work procedures relating to gender based violence.
- Explicit reference to gender equality, diversity and harassment issues.
- Code of Conduct & Code of Ethics complemented by a Whistleblower policy.
- Assurance of non-prejudicial consequences if a complaint is filed, i.e. denial of promotion, psychological harassment, transfer to another location, etc.
- Integrity is among the Customs administration’s key values.
- Social media policy which reinforces expectations of employee behavior on social media.
Gender mainstreaming is the process of assessing the implications for women and men of any planned action, including anti-corruption and integrity promotion activities. This assessment should be done in all areas and at all levels (e.g. in the design, implementation, monitoring, and evaluation) – to ensure that women and men can benefit equally, and that inequality is not perpetuated in the action itself.

Since each Customs administration is different, it is up to each administration to determine the most appropriate way to implement gender equality and diversity into their own integrity projects, whilst using a progressive approach, depending upon the organization, resources, and other factors, such as national policy framework and cultural context.

The ultimate goal of gender mainstreaming is to achieve gender equality (though diversity aspects can also be incorporated into this process to achieve inclusion).

Gender mainstreaming in integrity projects can be implemented at all four stages of the project life cycle approach, which is also used for other reform and modernization initiatives.

WCO Members are encouraged to refer to the WCO Gender Equality Organizational Assessment Tool (GEOAT) for the Diagnostic step.
### Questions to be asked throughout the whole project life cycle

| **Assess division of labor (roles)** | Who is involved in the integrity project, both internally and externally? Who are the beneficiaries? What groups are we targeting? Are we using sex disaggregated data? |
| **Assess access, control and benefits** | Are there any specific constraints for certain groups to reach the integrity project’s benefits? Who will mostly benefit? Are we involving everyone in the consultation process (i.e. participatory reform process)? |
| **Differentiate needs, priorities and strengths** | Through stakeholder mapping, analyze the different needs and priorities of different groups related to the integrity project. |
| **Understand gender relations – factors that contribute to the status quo** | What are some of factors that contribute to perpetuate gender inequalities? Do these factors exist within the integrity project? |
| **Assess barriers and constraints** | How can we make the integrity project’s benefits more accessible for everyone? How will we monitor and evaluate this to make sure it happens? |
WHY DOES GENDER ANALYSIS MATTER FOR INTEGRITY IN CUSTOMS?

- **Internally:** there might be members of staff within Customs experiencing these issues as part of their everyday lives. Lack of power and control over resources and outcomes may have far-reaching results on an employee’s morale and incentive to maintain integrity.

- **Externally:** outside Customs, these are the issues society deals with every day. They affect perspectives, reactions, access to opportunities, information that can impact the integrity of their interactions with Customs.

There are several risks associated with not taking GED into consideration when managing integrity projects:

- **Reduced effectiveness of services** – not considering the diverse needs of distinct groups of the population can lead to poor outreach, reduced quality of services, increased levels of harassment and corruption, reduced economic growth and lower levels of compliance.

- **Reduced organizational performance** – by not fully resourcing staff’s skills and capacities, Customs may limit their own ability to attract or retain talents which may impact organizational performance. Stereotypes can also prevent us from reaching optimal performance.

- **Negative effects on national security** – by not acknowledging the risks faced by distinct groups, Customs may fail to meet the needs of the entire population.

...to prevent those risks: use gender analysis. It is a critical examination of how differences in gender roles, activities, needs, opportunities, and rights/entitlements affect men, women, girls and boys in certain situations or contexts. It allows the identification of strategies to address constraints to the access and control of resources; understanding of the types of disaggregated information available; and identification of gender gaps and measurement of their impact.
Gender blind (Show no distinction between gender. Policies & projects are gender-biased in favour of the existing gender relations and most often exclude women)...

Rethinking assumptions & practices ...via

Gender aware (Projects & policies demonstrate a recognition of the differences between men and women and the gender inequalities resulting from these differences).
Gender neutral policies

Gender neutral policies presume that the policy affects men and women equally. In reality, the policy effects are different for women versus men. Gender neutral policies provide the minimum expected from a gender-aware policy analysis. Such policies stem from an accurate assessment of the existing gender division of resources and responsibilities, and ensure that policy objectives are met as effectively as possible within a given context.

Gender neutral policies seek to target the appropriate development actors to realize certain pre-determined goals and objectives, but they leave the existing divisions of resources, responsibilities, and capabilities intact.

Gender specific policies

These are policies intended to target and benefit a specific gender, to achieve certain policy goals or to meet certain gender-specific needs more effectively, within the existing distribution of resources and responsibilities.

Gender-redistributive or transformative policies

- Code of Conduct mentions ban on discrimination and gender equality related issues such as ban against gender based violence and sexual harassment.
- Gender Equality Action Plan in place.
- Work procedures relating to gender based violence.
- Explicit reference to gender equality, diversity and harassment issues.
- Code of Conduct & Code of Ethics complemented by a Whistleblower policy.
- Integrity is among the Customs administration’s key values.
- Social media policy which reinforces expectations of employee behavior on social media.
4. Implementing gender equality and diversity in project stakeholder engagement

Customs are responsible for ensuring that everybody understands what they do, why and how. They must also make sure that they consider and adapt to everyone’s needs to the greatest extent possible.

- All stakeholders are involved and can effectively communicate the changes they want to see.
- Stakeholders are openly participating in the design process and work toward feasible solutions.
- Sense of ownership instilled: recommended reforms have a much greater chance of success, the risks of corruption, malpractice and fraud lessen.

Stakeholders identification & mapping, consultation and transparent communication are of great significance.
5. Using gender sensitive & inclusive language in talking about Integrity

It is important that Customs’ commitment to gender equality and inclusion is reflected in all integrity-related communication, information, and outreach provided by Customs administrations.

Language and communication should be considered throughout the entire process of gender mainstreaming and inclusion. What a Customs administration communicates and how it communicates will have huge impacts on the success of its integrity-related initiatives.

The following content is extracted from WCO e-learning module on Implementing Gender Equality and Inclusion in Customs.

5.1. LANGUAGE

Exclusion and discrimination demonstrate a lack of integrity. Promoting an inclusive language not only contributes to gender equality and diversity, but also to integrity, ethics, equity and fairness.
5. USING GENDER SENSITIVE & INCLUSIVE LANGUAGE IN TALKING ABOUT INTEGRITY

**Gender-sensitive language**
This is speaking and writing in a way that acknowledges and respects people’s gender identities and avoids perpetuating gender stereotypes. Given the key role of language in shaping cultural and social attitudes, using gender sensitive and inclusive language is a powerful way to promote gender equality and to eradicate gender and other biases.

**Inclusive language**
Inclusive language refers to a language that is welcoming and respectful of all individuals, regardless of their gender identity, race, ethnicity, or other personal characteristics. It is sensitive to differences and promotes equitable opportunities by preventing the use of words, phrases, or tones that demean, insult, or exclude people based on their belonging to a certain group or because of a particular attribute.

It should also be noted that language is fluid and that the meaning of words changes continuously. Therefore, it is more important to apply inclusive language principles rather than learning specific appropriate words or phrases, as these may change meaning over time.

It is equally important to consult with relevant individuals or groups, particularly those from any underrepresented populations, to ensure that communication is effective and respectful.

**Importance of language**
The words we use have the power to shape our perceptions, attitudes, and behaviors towards others. By using gender-sensitive and inclusive language, we promote equality, respect for all individuals, and contribute to creating a culture of inclusivity.

Gender sensitive and inclusive language can make it easier to avoid omission, challenge unconscious biases, and help to create a more respectful work environment.

Using these types of language also helps us to reflect on other things – such as how we include and refer to diverse and different members of society linguistically.

**Gender-discriminatory language**
Gender-discriminatory language includes words, phrases and other linguistic features that can be harmful, perpetuate negative stereotypes and demean or ignore a certain gender, leading to discrimination and bias.

**Gender-neutral language**
When discussing integrity, it is important to use gender-neutral language to be inclusive and respectful of all individuals regardless of their gender identity. Using gendered language such as “he” or “she” can create a sense of exclusion and reinforce gender stereotypes. An example of this would be ‘Customs Officer’, as here no gender is specified.

While this is intended to be used in a way that does not discriminate against any gender, the neutral terms often take the male perspective as a norm, and we miss the fact that policies can affect distinct groups, including women, in different ways.

In some languages (French, for instance), this is especially visible as the male norm is used in plural as the term encompasses both the females and males (for example, “douaniers”). In these cases, it is always better to explicitly write out both the female and the male versions to be inclusive (douaniers, douanières or alternatively douanier,èr.es).
Examples:

<table>
<thead>
<tr>
<th>Gender biased language</th>
<th>Gender neutral language</th>
<th>Gender discriminatory language</th>
<th>Gender sensitive language</th>
</tr>
</thead>
<tbody>
<tr>
<td>Each citizen has a responsibility to remind himself to pay his Customs duties in time.*</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Directors and their wives are invited to attend the event. **</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>We need to use the full manpower available for the investigation of smugglers. ***</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>The Chairperson is about to start the meeting.</td>
<td></td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Each trader will be given an opportunity to voice her/his concerns.</td>
<td></td>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>

* Prefer “Each citizen has a responsibility to remember to pay their Customs duties in time”.
** Prefer “Directors and their respective partners are invited to attend the event”.
*** Prefer “We need to use the full workforce available for the investigation of smugglers”.

Note: due to the specificities of each language, there will be different concepts of gender bias. In such cases, it is advised to consider and apply the gender neutral or sensitive equivalents that are most commonly used for each language.

Avoiding gender-biased language is an important part of advancing gender equality and inclusion. For example, using ‘workforce’ instead of ‘manpower’, ‘Chairperson’ instead of ‘Chairman’, and ‘honourable agreement’ instead of ‘gentleman’s agreement’ are all positive changes.

Not only gender should be taken into consideration, but also, other stereotypes should be avoided and other groups such as those with disabilities should also be considered. Therefore, using gender-sensitive and inclusive language is important.

Although small, these changes are highly effective in promoting inclusion.
5.2. IMAGES AND STEREOTYPES

Some of these images do reinforce stereotypes, such as the depiction of women wearing skirts or standing in the background. Others do not, as everyone is standing together as equals, while the group represents a diverse workforce.
With the help of the WCO Anti-Corruption and Integrity Promotion (A-CIP) Programme, which continues to look at gender equality and diversity in the context of anti-corruption efforts in Customs, alongside the WCO’s Gender Equality and Diversity Working Group, new insights and guidance for Members will continue to be gathered.

For example, the Customs Integrity Perception Survey (CIPS) results offer further analysis of the gender dimensions of the responses and perceptions on integrity. And as more Members strengthen their monitoring and implementation of integrity-related initiatives, the collective experiences of all stakeholders involved will shed light on this important issue.

The A-CIP Programme is also working with several partners on building a Next Generation Network (NGN) within Customs administrations. The views and perspectives of the groups being formed under the NGN are committed to discussing all aspects relating to inclusion and diversity.

By helping Partner Administrations move forward their respective agenda on gender equality & diversity, and ensuring actions under the Programme are inclusive and gender-responsive, the WCO A-CIP Programme recognizes these issues are critical to creating a positive, supportive, and inclusive organizational culture based on integrity.