



REIMAGINING SOCIAL CHANGE



Insights to improve women's workforce participation

March, 2024

Strengthening government efforts can enhance women's workforce participation rate¹

Improving women's workforce participation has tremendous benefits

Increasing women's workforce participation can:

- Boost India's GDP by upto 27%²
- Contribute to the achievement of SDG 5.5³
- Improve social outcomes such as girls' school enrollment⁴

There are opportunities for the government to drive this enhancement

- Indian government continues to prioritize women through various policies and schemes (e.g., gender budgeting⁵, Paalna - National Crèche Scheme⁶)
- GLOW has documented insights to strengthen these efforts and further boost women's workforce participation
- GLOW's insights are based on interviews with ~6,600 women⁷, engagement with 15+ companies⁸, and consultation with 15+ sector experts⁹

1. Women's labour force participation rate was 37% in 2023 per PLFS (2022-23); 2. [The Economic Times](#), Gender parity can boost India's GDP by 27%: WEF co-chairs, (2018); 3. Sustainable Development Goal 5.5: "Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic, and public life"; 4. <https://www.imf.org/external/pubs/ft/sdn/2013/sdn1310.pdf> [International Monetary Fund, 2013]; 5. [Hindustan Times \(2023\)](#); 6. [MoWCD](#); 7. [GLOW's interviews with >6,600 women and their families from households with low income across 16 cities in 14 states in India](#); 8. Includes logistics and flexi-staffing companies; 9. Includes 8 industry professionals, 4 legal experts and 7 gender equality and social inclusion experts

5 guiding principles can be applied to address barriers to women's workforce participation















Barriers to women's workforce participation

- There are biases on women's role in society/ at work
- It is costlier to employ women as compared to men
- Women may face safety risk in/ around workplace
- Some pro-women policies unintentionally affect women's competitiveness in the job market
- Companies are not aware of the business benefits of a gender diverse workforce

Guiding principles to boost women's workforce participation

- Disallow company practices that discriminate against women
- Reduce cost/ access gap for women workers
- Improve access to existing benefits for women
- Shift mindsets on women's role
- Track and incentivize gender diversity among employers













In this document, we have explored 17 insights based on the 5 guiding principles (1/3)

Principle	Insight	Effort ¹	Cost ²
 <p>Disallow company practices that discriminate against women</p>	<p>1 Gender neutral job ads: Disallow employers from restricting job advertisements to men only, or using terms that imply so</p>		
	<p>2 Gender neutral crèche breaks: Mandate employers to extend crèche visit break to men as well</p>		
 <p>Reduce cost/ access gap for women workers</p>	<p>3 Paid paternity leave: Introduce 13 weeks of paid paternity leave for men through ESIC</p>		
	<p>4 Gender neutral night shift rules: Make certain state-imposed conditions for night shift employment gender-neutral</p>		
	<p>5 Relaxed night shift rules: Relax certain state-imposed conditions for employing women at night</p>		
	<p>6 Night shift start time extension: Delay the start time for night shift conditions in certain locations to 10 PM, from the current state-imposed 7 PM or 8 PM</p>		

 Very high
  High
  Medium
  Low

ESIC: Employees' State Insurance Corporation 1. Refers to GLOW's estimation of effort required to design, roll out, and monitor the proposed insight. A low effort insight may have a short roll out duration (e.g., <3 months) with minimum/ no monitoring effort required; a high effort insight may have a longer roll out duration (e.g., 6-12 months) and may require on-going monitoring/ compliance effort; 2. Refers to GLOW's estimation of public funds required to design, roll out, and monitor the proposed insight. A low cost roll out may not involve any direct implementation cost, while a high cost roll out may involve an outlay of INR 1,000 Cr.+ for design, implementation and compliance activities


















In this document, we have explored 17 insights based on the 5 guiding principles (2/3)

Principle	Insight	Effort ¹	Cost ²
 <p>Improve access to existing benefits for women</p>	<p>7 ESIC maternity benefit utilization: Improve utilization of maternity benefits under ESIC by increasing awareness and simplifying the claim process</p>		
	<p>8 Funding for maternity leave: Reimburse employer for maternity leave through public funds, upto INR 1,500 per week per woman</p>		
 <p>Shift mindsets on women's role</p>	<p>9 Spousal responsibility awareness campaign: Run public service campaigns to highlight caregiving and domestic work as shared responsibility of spouses</p>		
	<p>10 Women in the workforce campaign: Run public service campaigns to showcase women in the workforce</p>		
	<p>11 Gender inclusive school curriculum: Introduce guidelines on inclusion of gender equity lessons in school curricula, and gender audit of school text books</p>		

 Very high
  High
  Medium
  Low

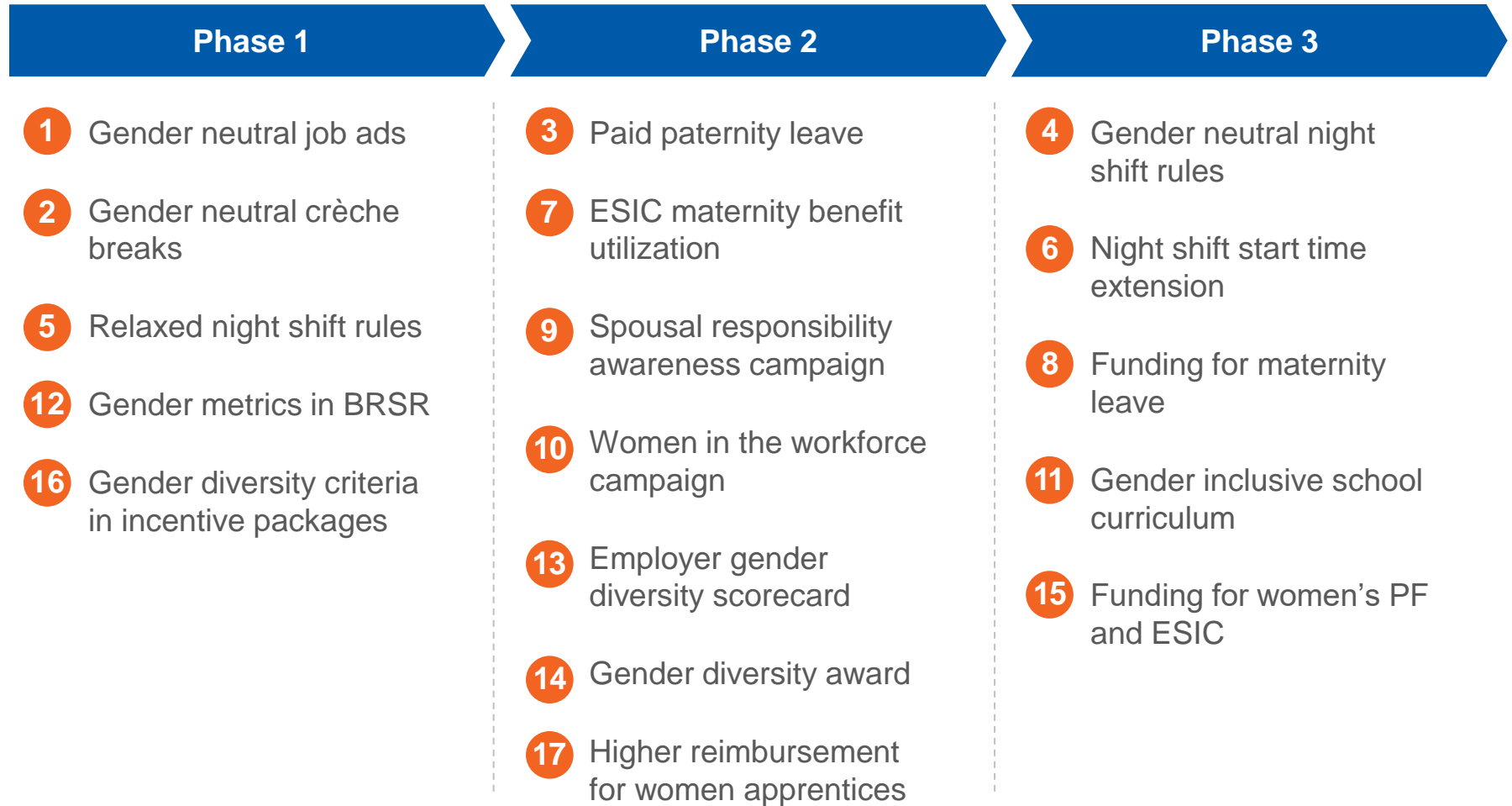
ESIC: Employees' State Insurance Corporation 1. Refers to GLOW's estimation of effort required to design, roll out, and monitor the proposed insight. A low effort insight may have a short roll out duration (e.g., <3 months) with minimum/ no monitoring effort required; a high effort insight may have a longer roll out duration (e.g., 6-12 months) and may require on-going monitoring/ compliance effort; 2. Refers to GLOW's estimation of public funds required to design, roll out, and monitor the proposed insight. A low cost roll out may not involve any direct implementation cost, while a high cost roll out may involve an outlay of INR 1,000 Cr.+ for design, implementation and compliance activities

In this document, we have explored 17 insights based on the 5 guiding principles (3/3)

Principle	Insight	Effort ¹	Cost ²
 <p>Track and incentivize gender diversity among employers</p>	12 Gender metrics in BRSR: Incorporate additional gender diversity metrics (e.g., gender breakup at different levels) within SEBI's BRSR format		
	13 Employer gender diversity scorecard: Categorize employers based on their gender diversity scores, and publish the list on MoLE's website		
	14 Gender diversity award: Institute an annual gender diversity award to recognize and reward employers		
	15 Funding for women's PF and ESIC: Fund 50% of employers' PF and ESIC contribution for women upto INR 500 per month, for 5 years		
	16 Gender diversity criteria in incentive packages: Include gender diversity criteria within existing state level incentive packages (e.g., Karnataka's ESDM special incentives scheme, Production-linked incentive scheme)		
	17 Higher reimbursement for women apprentices: Under NAPS, reimburse 30% stipend for women apprentices and 20% for men, instead of the current flat 25%		
		 Very high  High  Medium  Low	

BRSR: Business Responsibility and Sustainability Reporting; SEBI: Securities and Exchange Board of India; MoLE: Ministry of Labour and Employment; PF: Provident Fund; ESIC: Employees' State Insurance Corporation; ESDM: Electronics System Design & Manufacturing; NAPS: National Apprenticeship Promotion Scheme; 1. Refers to GLOW's estimation of effort required to design, roll out, and monitor the proposed insight. A low effort insight may have a short roll out duration (e.g., <3 months) with minimum/ no monitoring effort required; a high effort insight may have a longer roll out duration (e.g., 6-12 months) and may require on-going monitoring/ compliance effort; 2. Refers to GLOW's estimation of public funds required to design, roll out, and monitor the proposed insight. A low cost roll out may not involve any direct implementation cost, while a high cost roll out may involve an outlay of INR 1,000 Cr.+ for design, implementation and compliance activities

We categorized the 17 insights into 3 implementation phases starting with low-effort and low-cost insights



We also identified 7 public infrastructure improvements that could support women's workforce participation

- 1 Increase **street lighting and security cameras** in public areas, especially in commercial belts in the outskirts (e.g., industrial parks, SEZs, logistics parks)
- 2 Improve and expand **public transportation options**, especially in commercial belts in the outskirts (e.g., industrial parks, SEZs, logistics parks)
- 3 Enhance **provisions to prevent harassment on public transportation** (e.g., introduce women-only compartments/ buses during specific hours, install security cameras in public transportation)
- 4 Increase police patrols, including presence of women officers, especially after 7:00 PM
- 5 Implement technology solutions such as **panic buttons or mobile apps for reporting safety-related incidents** in real-time
- 6 Improve access to **affordable and good-quality hostels for working women, and crèches and elderly care facilities** for their families
- 7 Improve access to **well-maintained public washrooms** for women

Insights shared in this document entail some risks, including (but not limited to)...

- 1 Additional implementation/ compliance costs** for employers (e.g., providing paternity leave)
- 2 Societal and cultural resistance** to changing traditional gender norms and expectations (e.g., delay in night shift start timing)
- 3 Unintended consequences** (e.g., risk of dual employment by male employees during paternity leave)
- 4 Low impact potential** (e.g., low/ no mindset shift from spousal responsibility campaign)
- 5 Difficulty tracking and measuring compliance/ progress accurately** (e.g., verifying gender diversity reported for claiming incentives under ESDM¹/ PLI²)
- 6 Potential inconsistencies with existing policies/ acts** (e.g., night shift conditions per S&E Act³ v/s new labour code, rules on crèche provision under Maternity Benefit v/s Contract Labour Regulation Act)

1. Electronics System Design & Manufacturing; 2. Production Linked Incentive scheme; 3. Shops and Establishments Act

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Acronyms

ABRY	Aatmanirbhar Bharat Rojgar Yojana
BRSR	Business Responsibility and Sustainability Reporting
CSR	Corporate Social Responsibility
DoEITBTST	Department of Electronics, Information Technology, Biotechnology, and Science & Technology
ERA	Equal Remuneration Act
ESDM	Electronics System Design and Manufacturing
ESIC	Employees' State Insurance Corporation
GLOW	Growing Livelihood Opportunities for Women
MoLE	Ministry of Labour and Employment
MoWCD	Ministry of Women and Child Development
MSDE	Ministry of Skill Development and Entrepreneurship
NAPS	National Apprenticeship Promotion Scheme
NCERT	National Council of Educational Research and Training
OSH Code	Occupational Safety, Health and Working Conditions Code
PF	Provident Fund
SEBI	Security and Exchange Board of India
SEZ	Special Economic Zone
S&E Act	Shops and Establishments Act

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1 Acronyms

2 Detailed insights

a. Disallow company practices that discriminate against women

b. Reduce cost/ access gap for women workers

c. Improve access to existing benefits for women

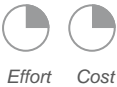
d. Shift mindsets on women's role

e. Track and incentivize gender diversity among employers

3 About FSG and GLOW

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1 Disallow employers from restricting job advertisements to men only, or using terms that imply so



Current policy	Proposed change
<p>The current Equal Remuneration Act (ERA), 1976¹ states “On and from the commencement of this Act, no employer shall, while making recruitment for the same work or work of a similar nature, [or in any condition of service subsequent to recruitment such as promotions, training or transfer,] make any discrimination against women except where the employment of women in such work is prohibited or restricted by or under any law for the time being in force”</p>	<p>Include the following in the Equal Remuneration Act, in addition to the current provisions: “No employer shall restrict a job advertisement to men candidates only or use terms in the advertisement that imply so, except where the employment of women in such work is prohibited or restricted by or under any law for the time being in force. Additionally, in all job advertisements posted on company website/ job portals/ newspapers, employer shall include a public service announcement specifying that ERA prohibits employers from restricting job advertisements to men only”</p>

Rationale for the proposed change

- Gender-based discrimination at hiring stage is currently prevalent in India
 - World Bank Group analyzed 8,30,929 job advertisements posted on an Indian blue collar jobs portal between 2007 and 2017 and found that employers often look for only male candidates – the study identified that 36% of the ads specified the gender of the potential candidate, of which, a majority preferred men over women²
 - *“Clients for frontline roles, especially FMCG and manufacturing, say they do not want women”* [Recruitment Head, Staffing Company]
- Gender-neutral job advertisements will result in increased women applicants
 - *“I didn’t even know these companies hire women for doing deliveries”* [2 women that GLOW interacted with]
 - A study of 1,57,890 Indian job advertisements reported that *“Given women applicant shares are higher in gender non-targeted ads, restricting employers from stating their gender preference can reduce gender segregation at the application stage”*³
- Some countries (e.g., Austria⁴) have mandated that job advertisements should be gender-neutral

Pros ⁵	Cons
<ul style="list-style-type: none"> • Increases women job applicants 	<ul style="list-style-type: none"> • None

1. https://samadhan.labour.gov.in/uploads/equal_remuneration_act_1976.pdf [Equal Remuneration Act, 1976]; 2. <http://surl.li/gevgh> [World Bank Group, 2018]; 3. <https://ceda.ashoka.edu.in/does-the-wording-in-a-job-ad-matter-for-the-gender-mix-of-job-applicants/> [Mahajan, 2021]; 4. <https://www.gleichbehandlungsanwaltschaft.gv.at/english/information-and-advice.html> [Equal Treatment Act]; 5. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’

2 Mandate employers to extend crèche visit break to men as well



Current policy	Proposed change
<p>The Maternity Benefit (Amendment) Act, 2017¹ states: “Every establishment having fifty or more employees shall have the facility of crèche within such distance as may be prescribed, either separately or along with common facilities: Provided that the employer shall allow four visits a day to the crèche by the woman, which shall also include the interval for rest allowed to her”</p>	<p>“Every establishment having fifty or more employees shall have the facility of crèche within such distance as may be prescribed, either separately or along with common facilities: Provided that the employer shall allow four visits a day to the crèche by the parent/ legal guardian, which shall also include the interval for rest allowed to the woman”</p>

Rationale for the proposed change
<ul style="list-style-type: none"> • The current policy has the following unintended consequences: <ul style="list-style-type: none"> – Makes hiring women employees more expensive; businesses might hence prefer to hire only men employees to minimize productivity loss due to crèche break requirement – Results in disproportionate childcare responsibilities on women – Reinforces the social norm that childcare is women’s responsibility

Pros ²	Cons
<ul style="list-style-type: none"> • Reduces disparity between the cost of employing men and women • Improves utilization of crèche facilities • Reduces the social expectation that childcare is women’s responsibility 	<ul style="list-style-type: none"> • Increases cost for employers

Ensure rules related to provision of crèche facilities are harmonized across the Maternity Benefit Act and the Contract Labour Regulation Act

1. <https://labour.gov.in/sites/default/files/maternitybenefitamendmentact2017.pdf> [Maternity Benefit Amendment Act, 2017]; 2. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under 'Pros'

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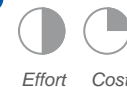
d. Shift mindsets on women's role

e. Track and incentivize gender diversity among employers

3 About FSG and GLOW

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3 Introduce 13 weeks of paid paternity leave for men through ESIC



Current policy	Proposed change
<p>Per the Employees' State Insurance (ESIC) Act, 1948, "maternity benefit is payable to women ESIC beneficiaries", and the amount payable is "100% of the average daily wages", for "upto 26 weeks (upto two surviving children and thereafter 12 weeks for third surviving child onwards), 6 weeks in case of miscarriage, 12 weeks for the commissioning mother, and 12 weeks for the adopting mother"¹</p>	<p>Include the following additional provision in ESIC Act: "paternity benefit is payable to men ESIC beneficiaries, and the amount payable is 100% of the average daily wages for upto 13 weeks (upto two surviving children and thereafter 6 weeks for third surviving child onwards), and 6 weeks for the adopting father. The leave should be availed within six months of the expected date of delivery, of which not more than three weeks shall precede the expected date of delivery"</p>

Rationale for the proposed change
<ul style="list-style-type: none"> The current policy has the following unintended consequences: <ul style="list-style-type: none"> Businesses prefer to hire men employees to avoid bearing the costs associated with providing 26 weeks of paid maternity leave, cost of creating crèches, and cost of a temporary employee who would need to be hired to fill the gap in the female employee's absence of nearly six months² <ul style="list-style-type: none"> "Over 25% of MSME entrepreneurs (out of 4,300 interviewed) prefer to hire men employees since providing extended maternity leave and childcare facilities negatively impact their business and profitability"³ "49% out of 8,500 start-ups and SMEs reported hiring fewer or no women due to the mandate of 6 months maternity leave"⁴ 3 GLOW partners cited maternity benefit costs as a deterrent for women hiring. The head of a staffing company said "Clients are unwilling to pay maternity benefits for outsourced staff" Absence of paternity leave reinforces the social norm that childcare is solely women's responsibility A World Bank Group study based on a sample of 53 developing countries reported an increase of ~6.8 percentage points in the proportion of women workers associated with the mandating of paternity leave⁵ 40+ countries have mandated at least 2 weeks of paternity leave (e.g., Spain, Kenya, Singapore)⁶

Pros ⁷	Cons
<ul style="list-style-type: none"> Reduces disparity between the cost of employing men and women Reduces the social expectation that childcare is women's responsibility Makes paternal benefits closer to maternal benefits, without reducing the benefits currently available to women 	<ul style="list-style-type: none"> Increases burden on ESIC corpus Only applies to beneficiaries of ESIC

1. <https://www.esic.gov.in/attachments/files/faq.pdf> [ESIC FAQ]; 2. <https://blogs.lse.ac.uk/southasia/2017/03/17/supporting-motherhood-or-discouraging-parenthood-a-curious-case-of-the-extended-maternity-leave-in-india/> [London School of Economics, 2017]; 3. https://www.undp.org/sites/g/files/zskgke326/files/migration/in/JustJobs_Disha_report.pdf [Joshi, 2017]; 4. <https://www.localcircles.com/a/press/page/international-womens-day-2020#.ZDDOAXZBw2x> [Local Circles, 2020]; 5. <https://tinyurl.com/WBpaternityleave> [World Bank Group, 2016]; 6. [Paternity Leave by Country 2024 \(worldpopulationreview.com\)](https://www.worldpopulationreview.com); 7. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under 'Pros'

Relaxing night shift conditions may entail certain risks that need to be mitigated

Stakeholders consulted by GLOW highlighted 3 key risks w.r.t. relaxing night shift conditions

- Relaxation of night shift employment conditions may result in an increased safety risk for women employees
- Consistency in regulations across locations/ states may come at the expense of safety as local conditions/ contexts vary widely
- Relaxation of night shift employment conditions may increase the legal and reputation risks for employers

There is a need to assess risks and implement mitigation measures before relaxing the conditions

- Conduct wider consultation with gender, industry, and legal experts to identify and assess potential risks
- Consider relaxing conditions only in certain locations (e.g., locations with low safety-risk, and strong public infrastructure)
- Where relevant, implement additional safeguards to mitigate risks (e.g., increase police patrols post 7 PM)
- Where relevant, improve safe public transportation availability (especially post 7 PM) in collaboration with public transport/ municipal authorities, before extending night shift start time
- ...

Relaxing night shift conditions, with necessary mitigation measures in place, could help boost women's employment (See insights in subsequent slides)

4 Make four night shift conditions for Haryana gender-neutral



Current policy per Punjab Shops and Establishment Act (Haryana Labour Department Notification, February, 2023) ¹	Proposed changes
<ul style="list-style-type: none"> • “The employer shall provide proper lighting not only inside the shop/ establishment, but also surrounding of the shop/ establishment and to all places where the female employees may move out of necessity in the course of such shift” • “Sufficient number of work sheds shall be provided for the female employees to arrive in advance and also leave after the working hours” • “There shall be not less than twelve consecutive hours of rest or gap between the last shifts and the night shift wherever a women employee is changed from day shift to night shift and so also from night shift to day shift” • “The employer shall provide transportation facility to the women employees from their residence and back (for the night shifts)” 	<ul style="list-style-type: none"> • “The employer shall provide proper lighting not only inside the shop/ establishment, but also surrounding of the shop/ establishment and to all places where the employees may move out of necessity in the course of such shift” • “Sufficient number of work sheds shall be provided for the employees to arrive in advance and also leave after the working hours” • “There shall be not less than twelve consecutive hours of rest or gap between the last shifts and the night shift wherever an employee is changed from day shift to night shift and so also from night shift to day shift” • “The employer shall provide transportation facility to the employees from their residence and back (for the night shifts)”

Rationale for the proposed change
<ul style="list-style-type: none"> • The current policy has unintentionally led to women becoming uncompetitive in the labour market: <ul style="list-style-type: none"> – Businesses prefer to hire men employees for night shifts to avoid the additional costs of complying to the state-imposed conditions, and to avoid non-compliance issues – Businesses prefer to hire men employees for day shifts that end late, to avoid compliance requirements

Pros ²	Cons
<ul style="list-style-type: none"> • Reduces disparity between hiring costs for men and women • Reduces safety-related risks for all employees 	<ul style="list-style-type: none"> • Increases cost for employers

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. <https://www.egazetteharyana.gov.in/Gazette/Extra-Ordinary/2023/39-2023-Ext/15666.pdf> [Haryana Government Labour Department Notification, 2023]; 2. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under 'Pros'

4 Make one night shift condition for Maharashtra gender-neutral



Current policy as per Maharashtra Shops and Establishment Act, 2017 ¹	Proposed changes
<p>“Transportation should be provided from the establishment to the doorstep of their women workers’ residence by the employer or his authorized representative or manager or supervisor”</p>	<p>“Transportation should be provided from the establishment to workers’ residence by the employer or his authorized representative or manager or supervisor”</p>

Rationale for the proposed change
<ul style="list-style-type: none"> • The current policy has unintentionally led to women becoming uncompetitive in the labour market: <ul style="list-style-type: none"> – Businesses prefer to hire men employees for night shifts to avoid the additional costs of complying to the state-imposed conditions, and to avoid non-compliance issues – Businesses prefer to hire men employees for day shifts that end late, to avoid compliance requirements

Pros ²	Cons
<ul style="list-style-type: none"> • Reduces disparity between hiring costs for men and women • Reduces safety-related risks for all employees 	<ul style="list-style-type: none"> • Increases cost for employers

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. Maharashtra Shops and Establishments (Regulation of Employment and Conditions of Service) Act, 2017, Notification dated 23rd March 2018; 2. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under 'Pros'

4 Make one night shift condition for Karnataka gender-neutral



Current policy as per the Karnataka Shops and Commercial Establishments Act, 2021 ¹	Proposed changes
<p>“The establishment shall provide transport facilities from the residence of the woman employee to the workplace and back free of cost and with adequate security”</p>	<p>“The establishment shall provide transport facilities from the residence of employees to the workplace and back, free of cost and with adequate security”</p>

Rationale for the proposed change
<ul style="list-style-type: none"> • The current policy has unintentionally led to women becoming uncompetitive in the labour market: <ul style="list-style-type: none"> – Businesses prefer to hire men employees for night shifts to avoid the additional costs of complying with the state-imposed conditions, and to avoid non-compliance issues – Businesses prefer to hire men employees for day shifts that end late, to avoid compliance requirements

Pros ²	Cons
<ul style="list-style-type: none"> • Reduces disparity between hiring costs for men and women • Reduces safety-related risks for all employees 	<ul style="list-style-type: none"> • Increases cost for employers

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. [https://dpal.karnataka.gov.in/storage/pdf-files/08%20of%201962%20\(E\).pdf](https://dpal.karnataka.gov.in/storage/pdf-files/08%20of%201962%20(E).pdf) [Karnataka Shops and Commercial Establishments Act, 2021]; 2. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under 'Pros'

4 Make one night shift condition for Uttar Pradesh gender-neutral



Current policy as per the Uttar Pradesh Occupational Safety, Health and Working Conditions Code Rules, 2021 ¹	Proposed changes
“The employer shall make necessary arrangements at the expense of the establishment for her transport from her residence to the establishment and back”	“The employer shall make necessary arrangements at the expense of the establishment for transport of all employees from their residence to the establishment and back”

Rationale for the proposed change
<ul style="list-style-type: none"> • The current policy has the following unintended consequences: <ul style="list-style-type: none"> – Businesses prefer to hire men employees for night shifts to avoid the additional costs of complying to the state-imposed conditions, and to avoid non-compliance issues – Businesses prefer to hire men employees for day shifts that end late, to avoid compliance requirements

Pros ²	Cons
<ul style="list-style-type: none"> • Reduces disparity between hiring costs for men and women • Reduces safety-related risks for all employees 	<ul style="list-style-type: none"> • Increases cost for employers

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. https://uplabour.gov.in/LC/MediaGallery/1365_03082022E.pdf [The Uttar Pradesh Occupational Safety, Health and Working Conditions Code Rules, 2021]; 2. Estimating the economic benefits (to employer/government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under 'Pros'

5 Allow women to work in the night shift in all industries in certain locations in West Bengal



Current policy as West Bengal Shops and Establishments Act, 1963 ^{1,5}	Proposed changes per Maharashtra Shops and Establishment Act, 2017 ²
“No woman shall be allowed or permitted to work in any shop or commercial establishment after 8oclock post merediem”	“A woman worker, with her consent, shall be allowed to work from 9:30 PM to 7:00 AM in any shop or establishment in certain locations ² , subject to following conditions being fulfilled by the employer or their authorized representative or manager or supervisor”

Proposed night shift conditions modelled on existing rules per Maharashtra Shops and Establishment Act, 2017³

- “There shall be not less than twelve consecutive hours of rest or gap between the last shifts and the night shift wherever an employee is changed from day shift to night shift and so also from night shift to day shift”
- “The number of women workers employed in the night shift shall not be less than three at any point of time”
- “Employers shall provide facilities of latrines and urinals, for all employees. Several employers may provide common facilities in case of space constraints. Locking facility should only be from only from inside”
- “The employer shall provide transportation facility to employees from their residence and back (for the night shifts) and in case of buses, the vehicles shall also be equipped with CCTV cameras. The employer shall have all the details and complete the police verification of the drivers, guards and all such workers engaged by themselves or through any agency or contractor for transport”
- “A sufficient number of women security guards shall be engaged in establishment employing not less than ten women workers, upon completion of mandatory police verification of security guards”

Rationale for the proposed change

- The current policy restricts women from having equal employment opportunities (as compared to men workers)
- 10th/ 12th pass women are keen to work in jobs. Restriction on night shift employment limits job opportunities for these women in high growth industries, such as logistics, where a large proportion of workforce is employed in the night shift⁴
- More than 12 states in India allow commercial establishments to employ women at night if they comply with state-level conditions⁵

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. https://wbcl.gov.in/sites/default/files/upload/content_act_rule_pdf/The%20West%20Bengal%20Shops%20&%20Estt.%20Act.%201963.pdf [West Bengal Shops and Establishments Act, 1963];
 2. Identify suitable locations considering factors such as transport option availability, presence of people on the roads post ~8 PM. The list could cover urban areas, SEZs, industrial parks, etc.; 3. Maharashtra Shops and Establishments (Regulation of Employment and Conditions of Service) Act, 2017, Notification dated 23rd March 2018; 4. <https://www.fsg.org/wp-content/uploads/2022/11/Detailed-findings-from-our-urban-research.pdf> [Detailed Findings from GLOW’s Urban Research]; 5. <https://www.authorea.com/users/462272/articles/558891-state-of-discrimination-report> [State of Discrimination Report, Trayas, March 2022]

5 Relax two night shift conditions for Haryana as there are at least four large states that do not impose them



Current policy as per Punjab Shops and Establishment Act (Haryana Labour Department Notification, February, 2023) ¹ , and proposed changes	Does Karnataka have a similar condition? ²	Does Maharashtra have a similar condition? ³	Does Uttar Pradesh have a similar condition? ⁴	Does Tamil Nadu have a similar condition? ⁵
<p>Current policy: “Separate canteen facility shall be provided for the female employees”</p> <p>Proposed change: Drop this rule</p>	No	No	No	No
<p>Current policy: “During night shift not less than 1/3rd of strength of the supervisors or shift-in-charge or foreman or other supervisory staff shall be women”</p> <p>Proposed change: Change the rule to “During night shifts not less than three women employee shall be allowed or required to work in the premises”</p>	No	No. However, Maharashtra’s rule states “The number of women workers employed in the night shift shall not be less than three at any point of time”	No. However, Uttar Pradesh’s rule states “During night shifts not less than four women employee shall be allowed or required to work in the premises or a particular department”	No
Pros ⁶			Cons	
<ul style="list-style-type: none"> Reduces disparity between hiring costs for men and women Reduces complexity for employers w.r.t. compliance requirements for employing women at night Aligns with Haryana government’s attempts to relax night shift conditions (e.g., in 2023¹, the state dropped conditions on provision of women security at entry/ exit points, and the requirement of at least two women wardens per shift) 			<ul style="list-style-type: none"> N/A 	

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. <https://www.egazetteharyana.gov.in/Gazette/Extra-Ordinary/2023/39-2023-Ext/15666.pdf> [Haryana Government Labour Department Notification, 2023]; 2. [https://dpal.karnataka.gov.in/storage/pdf-files/08%20of%201962%20\(E\).pdf](https://dpal.karnataka.gov.in/storage/pdf-files/08%20of%201962%20(E).pdf) [Karnataka Shops and Commercial Establishments Act, 2021]; 3. Maharashtra Shops and Establishments (Regulation of Employment and Conditions of Service) Act, 2017, Notification dated 23rd March 2018; 4. https://uplabour.gov.in/LC/MediaGallery/1365_03082022E.pdf [Uttar Pradesh Occupational Safety, Health and Working Condition Code Rules, 2021]; 5. https://cms.tn.gov.in/sites/default/files/go/labemp_e_38_2022.pdf [Occupational Safety, Health And Working Conditions (Tamil Nadu) Rules, 2022]; 6. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’

5 Relax two night shift conditions for Karnataka as there are at least four large states that do not impose them



Current policy as per the Karnataka Shops and Commercial Establishments Act, 2021 ¹ , and proposed changes	Does Maharashtra have a similar condition? ²	Does Haryana have a similar condition? ³	Does Uttar Pradesh have a similar condition? ⁴	Does Tamil Nadu have a similar condition? ⁵
<p>Current policy: “The establishment shall bear the cost of crèche obtained by the women employees from voluntary or other organization”</p> <p>Proposed change: Drop this rule</p>	No	No	No	No
<p>Current policy: “The establishment shall have a control room/ travel desk for monitoring movement of vehicles”</p> <p>Proposed change: Drop this rule</p>	No	No	No	No

Pros ⁶	Cons
<ul style="list-style-type: none"> Reduces disparity between hiring costs for men and women Reduces complexity for employers w.r.t. compliance requirements for employing women at night 	<ul style="list-style-type: none"> N/A

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. [https://dpal.karnataka.gov.in/storage/pdf-files/08%20of%201962%20\(E\).pdf](https://dpal.karnataka.gov.in/storage/pdf-files/08%20of%201962%20(E).pdf) [Karnataka Shops and Commercial Establishments Act, 2021];
 2. Maharashtra Shops and Establishments (Regulation of Employment and Conditions of Service) Act, 2017, Notification dated 23rd March 2018;
 3. <https://www.egazetteharyana.gov.in/Gazette/Extra-Ordinary/2023/39-2023-Ext/15666.pdf> [Haryana Government Labour Department Notification, 2023];
 4. https://uplabour.gov.in/LC/MediaGallery/1365_03082022E.pdf [The Uttar Pradesh Occupational Safety, Health and Working Condition Code Rules, 2021];
 5. https://cms.tn.gov.in/sites/default/files/go/labemp_e_38_2022.pdf [Occupational Safety, Health And Working Conditions (Tamil Nadu) Rules, 2022]; 6. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’

5 Relax two night shift conditions for Uttar Pradesh as there are at least four large states that do not impose them



Current policy as per the Uttar Pradesh Occupational Safety, Health and Working Condition Code Rules, 2021 ¹ , and proposed changes	Does Karnataka have a similar condition? ²	Does Maharashtra have a similar condition? ³	Does Haryana have a similar condition? ⁴	Does Tamil Nadu have a similar condition? ⁵
<p>Current policy: “The employer shall provide for supper to all such female employees”</p> <p>Proposed change: Drop this rule</p>	No	No	No	No
<p>Current policy: “During night shifts not less than four women employee shall be allowed or required to work in the premises or a particular department”</p> <p>Proposed change: “During night shifts not less than three women employees shall be allowed or required to work in the premises or a particular department”</p>	No	No. However, Maharashtra’s rule states “The number of women workers employed in the night shift shall not be less than three at any point of time”	Yes – “During night shift not less than 1/3rd of strength of the supervisors or shift-in-charge or foreman or other supervisory staff shall be women”	No

Pros ⁶	Cons
<ul style="list-style-type: none"> • Reduces disparity between hiring costs for men and women • Reduces complexity for employers w.r.t. compliance requirements for employing women at night 	<ul style="list-style-type: none"> • N/A

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. https://uplabour.gov.in/LC/MediaGallery/1365_03082022E.pdf [The Uttar Pradesh Occupational Safety, Health and Working Condition Code Rules, 2021]; 2. [https://dpal.karnataka.gov.in/storage/pdf-files/08%20of%201962%20\(E\).pdf](https://dpal.karnataka.gov.in/storage/pdf-files/08%20of%201962%20(E).pdf) [Karnataka Shops and Commercial Establishments Act, 2021]; 3. Maharashtra Shops and Establishments (Regulation of Employment and Conditions of Service) Act, 2017, Notification dated 23rd March 2018; 4. <https://www.egazetteharyana.gov.in/Gazette/Extra-Ordinary/2023/39-2023-Ext/15666.pdf> [Haryana Government Labour Department Notification, 2023]; 5. https://cms.tn.gov.in/sites/default/files/go/labemp_e_38_2022.pdf [Occupational Safety, Health And Working Conditions (Tamil Nadu) Rules, 2022]; 6. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’

6 Delay the start time for night shift conditions from 8 PM to 10 PM in certain locations in Haryana



Current policy	Proposed change
Haryana government’s recent Labour Department notification (2023) states: “Allow employing women employees during night shifts i.e. from 08:00 PM to 06:00 AM subject to provisions” ¹	Modify the rule to state “Allow employing women employees during night shifts i.e. from 10:00 PM to 06:00 AM in certain locations ² subject to provisions”

Rationale for the proposed change
<ul style="list-style-type: none"> • The current policy has the following unintended consequences: <ul style="list-style-type: none"> – Businesses prefer to hire men employees for night shifts to avoid the additional costs of complying to the state-imposed conditions, and to avoid non-compliance issues <ul style="list-style-type: none"> ○ “Providing pick up and drop services is costly for employers” [CXO, Last mile delivery company] ○ “Currently, retail chains take a no-objection letter from the women who work after 8 PM. Under the current laws, companies fear litigation from women and their families for night shifts” [HR Head, Retail company] – Restricts women’s employment in day jobs that extend beyond 8:00 PM <ul style="list-style-type: none"> ○ “60-70% of retail sales happen between 6:00 PM–9:00 PM. Women are currently allowed to work only till 8:00 PM” [HR Head, Retail company] • Two retail chains and one warehouse company that GLOW interacted with said they would be able to meaningfully increase the number of women if the night shift start timing moved to 9:00 or 10:00 PM

Pros ³	Cons
<ul style="list-style-type: none"> • Reduces disparity between hiring costs for men and women • Reduces complexity for employers w.r.t. requirements for employing women at night 	<ul style="list-style-type: none"> • N/A

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. <https://www.egazetteharyana.gov.in/Gazette/Extra-Ordinary/2023/39-2023-Ext/15666.pdf> [Haryana Government Labour Department Notification, 2023]; 2. Identify suitable locations considering factors such as transport option availability, presence of people on the roads post ~8 PM. The list could cover urban areas, SEZs, industrial parks, etc.; 3. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’

6 Delay the start time for night shift conditions from 8 PM to 10 PM in certain locations in Karnataka



Current policy	Proposed change
<p>The Karnataka Shops and Commercial Establishment Act, 2021¹ defines night as “a period of at least twelve consecutive hours which shall include the interval between 8:00 PM and 6:00 AM”, <i>and</i> states “A women employee who is so willing may be allowed to work in a shop or commercial establishment during night subject to following conditions”</p>	<p>Modify the Karnataka Shops and Commercial Establishment Act to state “A women employee who is so willing may be allowed to work in a shop or commercial establishment between 10:00 PM and 6:00 AM in certain locations² subject to following conditions”</p>

Rationale for the proposed change
<ul style="list-style-type: none"> The current policy has the following unintended consequences: <ul style="list-style-type: none"> Businesses prefer to hire men employees for night shifts to avoid the additional costs of complying to the state-imposed conditions, and to avoid non-compliance issues <ul style="list-style-type: none"> “Providing pick up and drop services is costly for employers” [CXO, Last mile delivery company] “Currently, retail chains take a no-objection letter from the women who work after 8 PM. Under the current laws, companies fear litigation from women and their families for night shifts” [HR Head, Retail company] Restricts women’s employment in day jobs that extend beyond 8:00 PM <ul style="list-style-type: none"> “60-70% of retail sales happen between 6:00 PM–9:00 PM. Women are currently allowed to work only till 8:00 PM” [HR Head, Retail company] Two retail chains and one warehouse company that GLOW interacted with said they would be able to meaningfully increase the number of women if the night shift start timing moved to 9:00 PM or 10:00 PM

Pros ³	Cons
<ul style="list-style-type: none"> Reduces disparity between hiring costs for men and women Reduces complexity for employers w.r.t. requirements for employing women at night 	<ul style="list-style-type: none"> N/A

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. [https://dpal.karnataka.gov.in/storage/pdf-files/08%20of%201962%20\(E\).pdf](https://dpal.karnataka.gov.in/storage/pdf-files/08%20of%201962%20(E).pdf) [The Karnataka Shops and Commercial Establishments Act, 2021]; 2. Identify suitable locations considering factors such as transport option availability, presence of people on the roads post ~8 PM. The list could cover urban areas, SEZs, industrial parks, etc.; 3. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under 'Pros'

6 Delay the start time for night shift conditions from 7 PM to 10 PM in certain locations in Uttar Pradesh



Current policy	Proposed change
The Uttar Pradesh Occupational Safety, Health and Working Condition Code Rules, 2021 ¹ states that “women employees may be employed before 06:00 AM and beyond 07:00 PM in any establishment subject to the following conditions”	Modify the Uttar Pradesh Occupational Safety, Health and Working Condition Code Rules to state that “women employees may be employed before 06:00 AM and beyond 10:00 PM in any establishment in certain locations ² subject to the following conditions”

Rationale for the proposed change
<ul style="list-style-type: none"> The current policy has the following unintended consequences: <ul style="list-style-type: none"> Businesses prefer to hire men employees for night shifts to avoid the additional costs of complying to the state-imposed conditions, and to avoid non-compliance issues <ul style="list-style-type: none"> “Providing pick up and drop services is costly for employers” [CXO, Last mile delivery company] “Currently, retail chains take a no-objection letter from the women who work after 8 PM. Under the current laws, companies fear litigation from women and their families for night shifts” [HR Head, Retail company] Restricts women’s employment in day jobs that extend beyond 8:00 PM <ul style="list-style-type: none"> “60-70% of retail sales happen between 6:00 PM–9:00 PM. Women are currently allowed to work only till 8:00 PM” [HR Head, Retail company] Two retail chains and one warehouse company that GLOW interacted with said they would be able to meaningfully increase the number of women if the night shift start timing moved to 9:00 or 10:00 PM

Pros ³	Cons
<ul style="list-style-type: none"> Reduces disparity between hiring costs for men and women Reduces complexity for employers w.r.t. requirements for employing women at night 	<ul style="list-style-type: none"> N/A

Ensure national and state level night shift conditions are harmonized across OSH code, Shops & Establishment Act, and Factories Act

1. https://uplabour.gov.in/LC/MediaGallery/1365_03082022E.pdf [The Uttar Pradesh Occupational Safety, Health and Working Condition Code Rules, 2021]; 2. Identify suitable locations considering factors such as transport option availability, presence of people on the roads post ~8 PM. The list could cover urban areas, SEZs, industrial parks, etc.; 3. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’

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b. Reduce cost/ access gap for women workers

c. Improve access to existing benefits for women

d. Shift mindsets on women's role

e. Track and incentivize gender diversity among employers

3 About FSG and GLOW

4 Acknowledgements

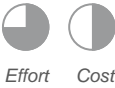
Insights to improve access to existing maternity benefits

	Un-employed women	Informally employed women		Formally employed women	
		Gig/ platform workers	Other informal sector workers	Employees/ workers earning < INR 21,000 per month	Employees/ workers earning > INR 21,000 per month
	Direct benefit transfer of INR 5,000 for first living child of the family ²				
Current maternity benefit ¹	N/A	Provision of maternity benefits under consideration as per Social Security Code 2020 ³ , and Rajasthan Platform Based Gig Workers (Registration and Welfare) Act, 2023 ⁴	N/A	Provision of 100% of the average daily wages for upto 26 weeks and additional confinement expense upto INR 5,000 by ESIC ⁵	Provision of 26 weeks of paid maternity leave by employer of which not more than eight weeks shall precede the expected date of delivery ⁶
Insight	N/A	N/A	N/A	Improve utilization of maternity benefits under ESIC by: <ul style="list-style-type: none"> Improving awareness Improving access Ensuring immediate disbursement of minimum INR 1,500 per week per woman 	Reimburse employer for maternity leave through public funds, upto INR 1,500 per week per employee

 Insights detailed out in subsequent slides

1. Disbursement of maternity benefit under current policies is subject to fulfilment of eligibility criteria for each policy; 2. <https://web.umang.gov.in/landing/department/pmmvy.html> [Pradhan Mantri Matru Vandana Yojana (PMMVY)]; 3. https://labour.gov.in/sites/default/files/ss_code_as_introduced_in_lok_sabha.pdf [The Code on Social Security, 2020]; 4. https://aioe.in/wp-content/uploads/2023/09/Gig_Workers_Bill_2023_1690274461.pdf [The Rajasthan Platform Based Gig Workers (Registration and Welfare) Bill, 2023, All India Organization of Employers]; 5. <https://www.esic.gov.in/attachments/files/faq.pdf> [ESIC FAQ]; 6. <https://labour.gov.in/sites/default/files/maternitybenefitamentmentact2017.pdf> [Maternity Benefit Amendment Act, 2017]

7 Improve utilization of maternity benefits under ESIC by increasing awareness and simplifying the claim process

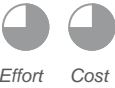


Current policy	Proposed implementation support
<ul style="list-style-type: none"> Per the Employees' State Insurance Act (ESIC), 1948, maternity benefit is payable to women ESIC beneficiaries, and the amount payable is "100% of the average daily wages", for "upto 26 weeks (upto two surviving children and thereafter 12 weeks for third surviving child onwards), 6 weeks in case of miscarriage, 12 weeks for the commissioning mother, and 12 weeks for the adopting mother"¹ To submit a claim request for cash benefit from ESIC, the woman employee must submit a claim request in the "Insured person/ beneficiary" window of the online ESIC portal. The request must include:² <ul style="list-style-type: none"> a "maternity certificate" created by a doctor from a pre-approved list of hospitals/ test centres, and employer's undertaking confirming employment and last drawn salary 	<ul style="list-style-type: none"> Increase awareness about maternity benefits offered by ESIC amongst women employees/ workers (e.g., run multimedia campaigns, mandate yearly information sessions by employers) Improve access to the ESIC portal by mandating employers to create, regularly update and communicate portal login credentials to employees (e.g., on monthly pay slips printed and provided to all employees) Improve access by enabling beneficiaries opting for offline method to continue documentation from different ESIC offices/ hospitals (e.g., integration across states for migrant workers) Simplify the maternity benefit claim process by dropping the requirement of 'employer undertaking confirming employment and last drawn salary' – this could instead be verified through ESIC contribution Increase the transparency of the claim approval and disbursement process by declaring the status of the claim request on the portal (e.g., request under review, request approved and awaiting disbursement, amount disbursed, reasons for rejection of request, etc.) Instate a time period within which each claim request must be resolved (e.g., within 4-8 weeks from date of filing of request) For approved claims, ensure immediate disbursement of minimum INR 1,500 for every week being paid for³

Rationale for the proposed change
<ul style="list-style-type: none"> Awareness of benefits offered by ESIC is poor; 11/ 12 women interviewed by GLOW did not know about maternity benefits available under ESIC and/ or the claim process The claim disbursement cycle is often delayed; per experts working with state-level ESIC departments, the disbursement of claim amount could take upto nine months from the date of filing the claim

1. <https://www.esic.gov.in/attachments/files/faq.pdf> [ESIC FAQ]; 2. https://www.datocms-assets.com/40521/1664191948-esi-user-manual_merged.pdf [ESIC Claim Request Submission for Cash Benefit - IP Portal, MoLE]; 3. Amount to cover 50% monthly wage of entry level workers (~INR 13,000 per month)

8 Reimburse employer for maternity leave through public funds, upto INR 1,500 per week per woman



Current policy	Proposed change
The Maternity Benefit (Amendment) Act, 2017 ¹ requires employers to bear the complete cost of 26 weeks of paid maternity leave	Include the following additional provision within the Maternity Benefit (Amendment) Act: “Employers are eligible for reimbursement of wages paid to women workers/ employees during their maternity leave , subject to a maximum amount of INR 1,500 ² per week per woman”

Rationale for the proposed change

- Complete liability on the employer to fund maternity leave results in businesses preferring to hire men employees to avoid this cost
 - According to an ILO report, “*employer liability schemes work against the interest of women workers, as employers may be reluctant to hire, retain or promote pregnant workers or women with family responsibilities or may seek to find reasons to discharge pregnant employees in order to avoid paying the costs of wage replacement during maternity leave*”³
 - “*Over 25% of MSME entrepreneurs (out of 4,300 interviewed) prefer to hire men employees since providing extended maternity leave and childcare facilities negatively impact their business and profitability*”⁴
 - 3 GLOW partners cited maternity benefit costs as a deterrent for hiring women. The head of a staffing company said “*Clients are unwilling to pay maternity benefits for outsourced staff*”
 - Women’s likelihood of being unemployed increases by 4%, and their median wages decline by 2%, after expansion of maternity benefits⁵
- Reducing employer’s liability to fund maternity leave will enable higher women employment
 - Based on analysis of data from 111 developing and emerging countries, a World Bank Group study reported that “*The impact of maternity leave on women’s employment is larger or more positive when maternity leave is fully funded by the government compared to when it is partly or fully paid by the employer*”⁶
- India is one of the few countries where employers bear the complete cost of maternity leave
 - As per ILO’s report, 136 of 185 countries surveyed fund maternity leave either partially or fully through social security systems³

Pros ⁷	Cons
<ul style="list-style-type: none"> • Reduces disparity between hiring costs for men and women 	<ul style="list-style-type: none"> • Increases cost for the government

1. <https://labour.gov.in/sites/default/files/maternitybenefitamendmentact2017.pdf> [Maternity Benefit Amendment Act, 2017]; 2. Amount to cover 50% monthly wage of entry level workers (~INR 13,000 per month)
 3. https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/@publ/documents/publication/wcms_242615.pdf [ILO, 2014];
 4. https://www.undp.org/sites/g/files/zskgke326/files/migration/in/JustJobs_Disha_report.pdf [Joshi, 2017]; 5. Applies to women aged 15 to 49, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4159552
 [Maternity leave and labour market outcomes, RBI and BITS Pilani, Hyderabad, 2022]; 6. <https://openknowledge.worldbank.org/server/api/core/bitstreams/282afaff-0db8-5965-824d-8110e6e00ca9/content> [World Bank Group, 2022]; 7. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’

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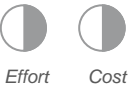
d. Shift mindsets on women's role

e. Track and incentivize gender diversity among employers

3 About FSG and GLOW

4 Acknowledgements

9 Run public service campaigns to highlight caregiving and domestic work as shared responsibility of spouses



Proposition

Under Mission Shakti^{1,2}, roll out a new multimedia public service campaign showcasing men partaking in domestic work (e.g., cooking, cleaning) and caregiving (e.g., taking care of children, taking care of elderly in the house). To design and implement the campaign, partner with private companies, civil society organizations, non-government organizations and professional associations working towards women empowerment. Allow private companies to contribute to the campaign using their CSR³ funds

Rationale for the proposed change

- Caregiving and domestic work are viewed as women’s responsibility; this in turn hinders their participation in workforce
 - 69% of key household decision makers interviewed by GLOW firmly believe that the main role of a woman is to take care of the home and children⁴
 - Per the National Statistical Office’s 2019 Time Use Survey, 81% women (including girls older than 6 years) in India spend time on unpaid domestic services for household members, as opposed to only 26% men⁵
 - “Women in India spend 9.8 times more time than men on unpaid work, as against the global average of 2.6 times”⁶
- India has run similar public service campaigns in the past to drive behavior change
 - “The impact created by Government’s flagship initiatives such as Swacch Bharat Mission, Jan Dhan Yojana and the Beti Bachao Beti Padhao provide testimony to the potential for behavioral change in India. Given our rich cultural and spiritual heritage, social norms play a very important role in shaping the behavior of each one of us. Behavioral economics provides the necessary tools and principles to not only understand how norms affect behavior but also to utilize these norms to effect behavioral change”⁷
- Other countries have run campaigns to encourage men to play a greater role in caregiving
 - Nordic co-operation ran a ‘#DadOnBoard!’ campaign in 2019 to inspire fathers to take a greater share of parental leave⁸

Pros ⁹	Cons
<ul style="list-style-type: none"> • Promotes gender equitable mindset • Aligns with existing goal of ‘Samarthya’ sub-scheme of Mission Shakti (economic empowerment of women)¹ 	<ul style="list-style-type: none"> • Risk of failure if the campaign is not implemented effectively/ appropriately <ul style="list-style-type: none"> – A study conducted in Bengaluru found that anti-smoking campaigns did not have the desired impact on the current tobacco users¹⁰

1. https://wcd.nic.in/sites/default/files/Mission%20Shakti%20Guidelines%20for%20Implementation%20during%2015th%20Finance%20Commission%20period%202021-22%20to%202025-26_1.pdf [Mission Shakti, 2022]; 2. Implemented by the Ministry of Women and Child Development; 3. <https://www.mca.gov.in/Ministry/pdf/CompaniesAct2013.pdf> [The Companies Act, 2013]; 4. <https://www.fsg.org/resource/creating-a-gender-equitable-workforce-in-india/> [FSG, 2022]; 5. <https://www.pib.gov.in/PressRelease/framePage.aspx?PRID=1660028> [Ministry of Statistics & Programme Implementation, NSSO Report: Time Use In India- 2019]; 6. <https://asiapacific.unwomen.org/en/stories/feature-story/2022/09/bridge-gender-gap-engage-the-workplaces-at-top-priority> [UN Women HQ, 2022]; 7. <https://www.indiabudget.gov.in/budget2019-20/economicsurvey/doc/echapter.pdf> [Economic Survey, 2018-19]; 8. <https://www.norden.org/en/news/dads-encourage-dads-new-nordic-campaign> [Nordic Co-operation]; 9. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’; 10. [https://www.jcdr.net/articles/PDF/12308/35140_CE\[Ra1\]_F\(S\)_PF1\(AJ_SL_RK\)_PN\(P\).pdf](https://www.jcdr.net/articles/PDF/12308/35140_CE[Ra1]_F(S)_PF1(AJ_SL_RK)_PN(P).pdf) [Sagar S Bhat et al, 2018]

10 Run public service campaigns to showcase women in the workforce



Proposition

Under Mission Shakti^{1,2}, expand the scope of the ongoing “Beti Bachao, Beti Padhao” campaign to **“Beti Bachao, Beti Padhao, Beti Swawlambi Banao”** by showcasing women in workforce, including in non-traditional roles (e.g., delivery agents, plumbers, field sales person) through a multimedia campaign. To design and implement the campaign, partner with private companies, civil society organizations, non-government organizations and professional associations working towards women empowerment. Allow private companies to contribute to the campaign using their CSR³ funds

Rationale for the proposed change

- 1 in 4 of the key household decision makers interviewed by GLOW believe that women should not work at all¹
- Even when women are trained, it is typically in gendered vocations
 - GLOW’s research revealed that *“While more than 30% of women have had some level of vocational training, 85% of trained women have received training in gendered topics”*⁴
- India has run similar public service campaigns in the past to drive behavior change
 - *“The impact created by Government’s flagship initiatives such as Swacch Bharat Mission, Jan Dhan Yojana and the Beti Bachao Beti Padhao provide testimony to the potential for behavioral change in India. Given our rich cultural and spiritual heritage, social norms play a very important role in shaping the behavior of each one of us. Behavioral economics provides the necessary tools and principles to not only understand how norms affect behavior but also to utilize these norms to effect behavioral change”*⁵
- Other countries have run campaigns to showcase women in the workforce
 - European Union recently initiated a “#EndGenderStereotypes” campaign – a key component of this campaign is “Unexpected?” which challenges gender stereotypes around career choices⁶

Pros⁷

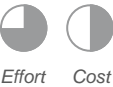
- Promotes gender equitable mindset
- Aligns with existing goal of ‘Sambal’ sub-scheme of Mission Shakti, that runs the “Beti Bachao, Beti Padhao” campaign¹

Cons

- Risk of failure if the campaign is not implemented effectively/ appropriately
 - A study conducted in Bengaluru found that anti-smoking campaigns did not have the desired impact on current tobacco users⁸

1. https://wcd.nic.in/sites/default/files/Beti%20Bachao-Beti%20Padhao_English.pdf [“Beti Bachao, Beti Padhao”, Mission Shakti]; 2. Implemented by the Ministry of Women and Child Development; 3. <https://www.mca.gov.in/Ministry/pdf/CompaniesAct2013.pdf> [The Companies Act, 2013]; 4. <https://www.fsg.org/resource/creating-a-gender-equitable-workforce-in-india/> [FSG, 2022]; 5. <https://www.indiabudget.gov.in/budget2019-20/economicsurvey/doc/echapter.pdf> [Economic Survey, 2018-19]; 6. https://end-gender-stereotypes.campaign.europa.eu/career-choices_en [#End Gender Stereotypes, European Union]; 7. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’; 8. [https://www.icdr.net/articles/PDF/12308/35140_CE\[Ra1\]_F\(SL\)_PF1\(AJ_SL_RK\)_PN\(P\).pdf](https://www.icdr.net/articles/PDF/12308/35140_CE[Ra1]_F(SL)_PF1(AJ_SL_RK)_PN(P).pdf) [Sagar S Bhat et al, 2018]

11 Introduce guidelines on inclusion of gender equity lessons in school curricula, and gender audit of school text books



Proposition

Include the following in the National Education Policy (NEP) to inculcate gender equity in school curricula:

- Guidelines on incorporating age-appropriate lessons on gender equity, and on eliminating gender stereotypes in textbooks for all grades and subjects (e.g., visuals showing women in workforce and men doing household chores in primary grades, case studies on women scientists in secondary grades)
 - Develop these guidelines based on UNESCO’s report on ‘Promoting Gender Equality through Textbooks’¹
- Institute a periodic gender audit (once every 3 years) of all school text books to identify and remove gender stereotypes
- Develop and publish guidelines for a comprehensive training program to equip teachers with the knowledge and skills to effectively integrate gender equity lessons into their pedagogy

Rationale for the proposed change

- Gender stereotyping is prevalent in Indian school textbooks
 - An analysis of class 2 to 5 NCERT text books revealed that gender-based division of labor is prevalent. “Men are shown involved in outdoor activities. They are portrayed as the head of the family, and often shown to be violent, fat or lazy. Women, on the other hand, are confined indoors, shown to be adept only at domestic chores”²
 - A report by MoWCD found that “Schools are not assisting in breaking gender role stereotypes but are actively perpetuating these”³
- Inculcating gender equity in school curricula will help shape mindsets from an early age
 - An intervention in Haryana that engaged adolescents in classroom discussions about gender equality found that the intervention resulted in more progressive gender attitudes⁴
- Some Indian states like Maharashtra⁵, Punjab⁶ and Odisha⁶ have already initiated action to minimize gender stereotyping in textbooks
 - “Keeping up with the changing social structure, Balbharati, Maharashtra’s state curriculum board, has changed many of its illustrations and texts to uphold gender equality and portray women in a more progressive light”

Pros ⁷	Cons
<ul style="list-style-type: none"> ● Promotes gender sensitivity and gender equitable mindset 	<ul style="list-style-type: none"> ● Increases effort for government

1. https://unesdoc.unesco.org/ark:/48223/pf0000158897_eng [UNESCO, 2009]; 2. <https://www.thehindu.com/news/national/karnataka/ncert-textbooks-riddled-with-gender-stereotypes-study/article19157408.ec> [The Hindu, 2017]; 3. <https://wcd.nic.in/sites/default/files/Vol%20I.compressed.pdf> [MoWCD, 2015]; 4. https://www.nber.org/system/files/working_papers/w25331/w25331.pdf [NBER, 2018]; 5. https://www.business-standard.com/article/pti-stories/maharashtra-school-textbooks-do-away-with-gender-stereotypes-119061900577_1.html [Business Standard, 2019]; 6. <https://idronline.org/article/gender/what-it-takes-to-replicate-a-gender-equality-programme/> [IDR, 2023]; 7. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’

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1 Acronyms

2 Detailed insights

a. Disallow company practices that discriminate against women

b. Reduce cost/ access gap for women workers

c. Improve access to existing benefits for women

d. Shift mindsets on women's role

e. Track and incentivize gender diversity among employers


3 About FSG and GLOW

4 Acknowledgements

12 Incorporate additional gender diversity metrics within SEBI's BRSR format



Current policy	Proposed change
<p>SEBI recently introduced the Business Responsibility and Sustainability Reporting (BRSR) format¹ covering ~50 performance indicators. Top 150 listed entities are mandated to disclose BRSR metrics in their annual report from FY'23; this will be extended to top 1000 listed entities by FY'27²</p>	<p>Include the following additional indicators to BRSR:</p> <ul style="list-style-type: none">• Workforce gender diversity break-up at different levels• Provision of flexible work arrangements, period leave, and free pick up and drop facilities to employees and workers• Parental leave provision for different employees and workers• Gender break-up of remuneration/ salary/ wages for different categories of employees and workers• Diversity improvement plan and target

 Detailed out in subsequent slides

1. https://www.sebi.gov.in/sebi_data/commondocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure1_p.PDF [SEBI BRSR format]
2. https://www.sebi.gov.in/sebi_data/meetingfiles/apr-2023/1681703013916_1.pdf [SEBI, 2023]

12 Include additional indicators on workforce gender diversity break-up in BRSR format



Proposed change

In 'Section A: General Disclosures', under '19. Participation/ Inclusion/ Representation of women',¹ **include metrics on workforce gender break-up at different levels** for both permanent and other than permanent employees/ workers

	Total (A)	No. and percentage of women	
		No. (B)	% (B/ A)
Board of Directors (BOD)			
Key Management Personnel (Permanent)			
Key Management Personnel – KMP (Other than permanent)			
Employees and workers who are not BOD/ KMP (Permanent)			
Employees and workers who are not BOD/ KMP (Other than permanent)			

Rationale for the proposed change

- The additional metrics will:
 - Highlight gender diversity gaps at different levels of the workforce
 - Indicate if the employer is building a gender diverse talent pipeline who can take on leadership roles in the future

 Additional metrics to be included in BRSR

1. https://www.sebi.gov.in/sebi_data/commndocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure1_p.PDF [SEBI BRSR format]

12 Include indicators on flexible work arrangements, period leave, and free transportation facilities in BRSR format



Proposed change

Under essential indicators for 'Principle 3. Businesses should respect and promote the well-being of all employees, including those in their value chains',¹ **include the following indicators on flexible work arrangements, period leave, and provision of free transportation**

Flexi-time option²:

- Does the company provide flexi-time option to:
 - All permanent entry-level³ employees and workers? (Y/N)
 - All other than permanent entry-level³ employees and workers? (Y/N)

Period leave:

- Does the company provide at least 1 day of period leave per month to:
 - All permanent women employees and workers? (Y/N)
 - All other than permanent women employees and workers? (Y/N)

Free pick up and drop facilities:

- Does the company provide free pick up and drop facilities (regardless of shift timing) to:
 - All permanent entry-level³ men employees and workers? (Y/N)
 - All other than permanent entry-level³ men employees and workers? (Y/N)
 - All permanent entry-level³ women employees and workers? (Y/N)
 - All other than permanent entry-level³ women employees and workers? (Y/N)

Rationale for the proposed change

- The additional metrics will indicate if the employer provides flexible work arrangements, period leaves, and free transportation facilities which can aid employee well-being and safety

Additional metrics to be included in BRSR

1. https://www.sebi.gov.in/sebi_data/commndocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure1_p.PDF [SEBI BRSR format]

2. Flexi-time refers to option to do part time shift and/ or to vary the start/ end time of the shift; 3. Entry-level refers to all employees and workers with monthly gross wages upto INR 15,000 per month

12 Include indicators on parental leave provision in BRSR format




Proposed change

Under essential indicators for 'Principle 3. Businesses should respect and promote the well-being of all employees, including those in their value chains',¹ **include additional metrics on parental benefits provision**

Type of employees/ workers	Men		Women	
	# weeks of paternity leave employee/ worker is eligible for	# employees/ workers who were provided paternity leave in the previous financial year	# weeks of maternity leave employee/ worker is eligible for	# employees/ workers who were provided maternity leave in the previous financial year
Permanent employees				
Permanent workers				
Other than permanent employees				
Other than permanent workers				

Rationale for the proposed change

- The additional metrics will highlight any gaps in parental benefits provided to men and women employees, and between employees at different levels

 Additional metrics to be included in BRSR

1. https://www.sebi.gov.in/sebi_data/commondocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure1_p.PDF [SEBI BRSR format]

12 Include additional indicators on gender-break up of remuneration/ salary/ wages in BRSR format



Proposed change

In 'Principle 5. Businesses should respect and promote human rights', under '3. Details of remuneration/ salary/ wages',¹ **include metrics on gender break-up of remuneration/ salary/ wages for different levels and categories of employees and workers**

	Men		Women	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BOD)				
Key Management Personnel				
Employees other than BoD and KMP (Permanent)				
Workers (Permanent)				
Employees otherthan BoD and KMP (Other than permanent)				
Workers (Other than permanent)				

Rationale for the proposed change

- The additional metrics will highlight gender pay gap at different levels

Additional metrics to be included in BRSR

1. https://www.sebi.gov.in/sebi_data/commondocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure1_p.PDF [SEBI BRSR format]

12 Include indicators on gender diversity improvement plan in BRSR report



Proposed change

Under leadership indicators for 'Principle 5. Businesses should respect and promote human rights',¹ **include metrics on gender diversity improvement plan and target**

- What is the company's target for percentage of women in workforce three years from now (including permanent and other than permanent employees and workers)?
- What is the company's target for percentage reduction in gender pay gap three years from now (including permanent and other than permanent employees and workers)?
- Did at least 20% of the managers have targets linked to hiring women in the previous financial year? (Y/N)
- Did at least 20% of the managers have financial incentives linked to hiring women in the previous financial year? (Y/N)
- Did the company provide women hiring mandate to at least 20% of its 3rd party contractors in the previous financial year? (Y/N)
- Does the company have a cross-functional diversity team? (Y/N)
- Does the company have a mentorship policy for women employees/ workers? (Y/N)
- What percentage of permanent employees completed a prevention of sexual harassment training in the previous financial year?
- What percentage of permanent employees completed unconscious bias training in the previous financial year?
- Details of a business process being modified/ introduced as a result of addressing human rights grievances/complaints
- Details of the scope and coverage of any Human rights due-diligence conducted
- ...

Rationale for the proposed change

- The additional metrics will indicate if the employer is taking proactive action to improve gender diversity

 Additional metrics to be included in BRSR

1. https://www.sebi.gov.in/sebi_data/commondocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure1_p.PDF [SEBI BRSR format]

13 Categorize employers based on their gender diversity scores, and publish the list on MoLE's website



Proposed change

- Categorize and publish list of employers based on their gender-diversity scores by:
 - Inviting interested employers (with at least 200 employees) to submit gender diversity indicators in SEBI's BRSR format¹ once a year
 - In BRSR format, highlight the specific diversity related metrics that employers need to fill (e.g., workforce gender break-up, gender pay gap, parental benefit policies)
 - Creating a tool that converts the reported indicators to a company-level gender diversity score
 - Categorizing and publishing the list of employers on MoLE's website:
 - Platinum category (employers with score over 75%)
 - Gold category (employers with score between 50%-75%)
 - Silver category (employers with score between 25%-50%)
 - Bronze category (employers with score <25%)

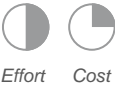
Rationale for the proposed change

- Employer's focus on improving gender diversity is low. 6 staffing companies that GLOW interacted with mentioned their clients do not ask for/ prefer women candidates
- Recognizing gender-diverse employers will boost their focus on gender diversity, and enable sharing of best practices
- Many other countries have instituted diversity related awards/ labels to encourage employers
 - *"Providing awards and labels to firms that have implemented comprehensive diversity strategies is fairly widespread across OECD countries. Most of these awards, e.g. in Australia, Spain, Portugal and Slovakia, concern policies that seek to promote gender equality based on selection criteria such as work-life balance, parental leave policies and flexible work arrangements"*²

Pros ³	Cons
<ul style="list-style-type: none"> • Increases prioritization of gender diversity by employers 	<ul style="list-style-type: none"> • Increases effort for the government

1. https://www.sebi.gov.in/sebi_data/commondocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure1_p.PDF [SEBI BRSR format]
 2. <https://www.oecd-ilibrary.org/sites/b976af4e-en/index.html?itemId=/content/component/b976af4e-en> [OECD, 2020]; 3. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under 'Pros'

14 Institute an annual gender diversity award to recognize and reward employers



Proposition

- Institute an annual gender diversity award for employers by:
 - Inviting interested employers to submit gender diversity indicators in SEBI’s BRSR format¹ once a year
 - In BRSR format, highlight the specific diversity related metrics that employers need to fill (e.g., workforce gender break-up, gender pay gap, parental benefit policies)
 - Creating a tool that converts the reported indicators to a company-level gender diversity score
 - Recognizing and awarding 20 gender diverse employers across four categories:
 - Top 5 gender-diverse micro units²
 - Top 5 gender-diverse small units²
 - Top 5 gender-diverse medium units²
 - Top 5 gender-diverse large corporates²

Rationale for the proposed change

- Employer’s focus on improving gender diversity is low. 6 staffing companies that GLOW interacted with mentioned their clients do not ask for/ prefer women candidates
- Recognizing and rewarding gender-diverse employers will boost their focus on gender diversity, and enable sharing of best practices
 - Indian government has instituted similar awards in the past (e.g., National CSR awards, National Startup awards, National energy conservation awards) to spread awareness and drive behaviour change amongst employers
- Many other countries have instituted diversity related awards
 - *“Providing awards and labels to firms that have implemented comprehensive diversity strategies is fairly widespread across OECD countries. Most of these awards, e.g. in Australia, Spain, Portugal and Slovakia, concern policies that seek to promote gender equality based on selection criteria such as work-life balance, parental leave policies and flexible work arrangements”³*

Pros ⁴	Cons
<ul style="list-style-type: none"> • Increases prioritization of gender diversity by employers 	<ul style="list-style-type: none"> • Increases effort for the government

1. https://www.sebi.gov.in/sebi_data/commondocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure1_p.PDF [SEBI BRSR format]; 2. <https://msme.gov.in/know-about-msme> [Classification to be as per MSME notification]; 3. <https://www.oecd-ilibrary.org/sites/b976af4e-en/index.html?itemId=/content/component/b976af4e-en> [OECD, 2020]; 4. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’

15 Fund 50% of employers' PF and ESIC contribution for women upto INR 500 per month for 5 years



Current policy	Proposed change
<ul style="list-style-type: none"> The current Employees' Provident Fund and Miscellaneous Provisions Act, 1952 requires eligible employers to contribute 12% of the employee's wages towards EPF and EPS¹ The current Employees' State Insurance (ESI) Act, 1948, requires eligible employers to contribute 3.25% of employees' wages towards the ESI fund² Under the Aatmanirbhar Bharat Rojgar Yojana (ABRY) 3.0 package, the government credited the employees' and employers' share of EPFO contribution (for all new employees hired from 30.06.2020 to 31.03.2022 and earning monthly wages less than INR 15,000) for upto 2 years¹ 	<p>Introduce an ABRY-like scheme as follows: "For the following 5 financial years, all employers are eligible for reimbursement of 50% of their total ESI, EPF and EPS contributions for all women employees hired on or after the date of notification of the scheme, subject to a maximum of INR 500 per employee per month"</p>

Rationale for the proposed change

- Reducing total cost of employing women will incentivize companies to hire more women
 - Per a World Bank Group study, offering fiscal and financial incentives to employers can promote gender equality³
- Similar incentive schemes have been piloted by other countries
 - Malaysia introduced tax incentives to encourage employers to train women who have re-entered the workforce after a career break³
 - Jordan piloted short-term wage subsidy vouchers for women graduates – this resulted in 40 percentage point increase in employment in the short-term, while long-term impact was unclear³
 - Canada rolled out a program to cover 25% of the first year salary for newly-hired women in non-traditional occupations⁴
- Indian government has also used the ABRY mechanism in the past to increase employment generation post COVID¹

Pros ⁵	Cons
<ul style="list-style-type: none"> Incentivizes employers to hire more women Enables govt. to leverage existing mechanism (ABRY 3.0) 	<ul style="list-style-type: none"> Increases costs for the government Impact potential of financial incentives is not well established¹

1. <https://labour.gov.in/brief-note-abry> [Brief note on ABRY, Ministry of Labour and Employment] [Wages include basic wages, dearness allowance, and retaining allowance]; 2. <https://www.esic.gov.in/contribution> [Employees' State Insurance Corporation website, 2023]; 3. <https://tinyurl.com/WBIncentives> [World Bank Group, 2019]; 4. <https://www.cbc.ca/news/canada/nova-scotia/stephen-mcneil-graduate-to-opportunity-1.4034576> [CBC, 2017]; 5. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under 'Pros'

16 Under Karnataka's ESDM special incentives scheme, offer higher benefits to employers with >30% women workforce



Current policy ¹	Proposed change
<p>The current ESDM special incentives scheme offers:</p> <ul style="list-style-type: none"> • INR 1.00 per unit power tariff reimbursement for 5 years from the month of commencement of commercial production to eligible employers • 100% exemption from electricity duty for 5 years from the month of commencement of commercial production to eligible employers 	<ul style="list-style-type: none"> • Power tariff reimbursement for 5 years from the month of commencement of commercial production to eligible employers as per the below rates: <ul style="list-style-type: none"> – INR 1.25 per unit power tariff for employers with at least 30% women in their workforce (considering both on-roll and outsourced) – INR 0.75 per unit power tariff for employers with less than 30% women in their workforce (considering on-roll and outsourced) • Exemption from electricity duty for 5 years from the month of commencement of commercial production to eligible employers as per the below rates: <ul style="list-style-type: none"> – 100% exemption from electricity duty for employers with at least 30% women in their workforce (considering both on-roll and outsourced) – 80% exemption from electricity duty for employers with less than 30% women in their workforce (considering both on-roll and outsourced)

Rationale for the proposed change
<ul style="list-style-type: none"> • Linking benefits packages to women employment will incentivize companies to hire more women <ul style="list-style-type: none"> – As noted by a World Bank Group study, offering fiscal and financial incentives to employers can promote gender equality² • Different types of financial incentive schemes have been piloted by other countries <ul style="list-style-type: none"> – Malaysia introduced tax incentives to encourage employers to train women who have re-entered the workforce after a career break² – Canada rolled out a program to cover 25% of the first year salary for newly-hired women in non-traditional occupations³

Pros ⁴	Cons
<ul style="list-style-type: none"> • Incentivizes hiring of women employees 	<ul style="list-style-type: none"> • Reduces benefits for employers with lower proportion of women employees

Add similar gender-related criteria to other state or national level incentive packages

1. <https://itbtst.karnataka.gov.in/storage/pdf-files/Special%20Incentives%20Scheme%20for%20ESDM%20OPG%20-%20Approval.pdf> [Karnataka DoEITBTST, 2021]; 2. <https://tinyurl.com/WBIncentives> [World Bank Group, 2019]; 3. <https://www.cbc.ca/news/canada/nova-scotia/stephen-mcneil-graduate-to-opportunity-1.4034576> [CBC, 2017]; 4. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under 'Pros'

17 Under NAPS, reimburse 30% of stipend for women apprentices and 20% for men



Current policy	Proposed change
<p>NAPS¹ currently offers “Sharing of 25% of prescribed stipend subject to a maximum of Rs. 1,500/- per month per apprentice with the employers”</p>	<p>Amend the provision under NAPS to offer “For companies with >20% women apprentices, allow sharing of 30% of prescribed stipend for women apprentices (subject to a maximum of Rs. 1,800 per apprentice per month) and 20% of prescribed stipend for men (subject to a maximum of Rs. 1,200 per apprentice per month)”</p>

Rationale for the proposed change
<ul style="list-style-type: none"> Uptake of women apprentices under NAPS is currently very low, as revealed by a study commissioned by MSDE <ul style="list-style-type: none"> “Amongst the 12 states under the study, women formed only 11% of the total apprentices in these states. Further to this, women apprentices in the 12 sample states accounted to a total of only 5% of all the apprentices in the manufacturing sector and 12% in the service sector”² “It has been observed that there is a general reluctance within the industry, especially the MSMEs, to take up women apprentices. In addition to the mindset that women cannot do certain types of jobs, they sometimes face genuine problems in terms of non-availability of funds for additional provisions to ensure safety and security of women”² Increasing the training cost coverage for women apprentices (instead of the current flat-rate for both men and women apprentices) will incentivize employers to hire more women apprentices Increase in women apprentices could have a cascading effect on increasing women’s participation in the workforce <ul style="list-style-type: none"> “To enter the labor force and bridge the gender pay gap and gendered job stratification, women will need to gain relevant technical, technological and management skills”³

Pros ⁴	Cons
<ul style="list-style-type: none"> Incentivizes hiring of women apprentices Reduces cost for government as percentage of women apprentices is currently low 	<ul style="list-style-type: none"> Increases cost for the industry to train men apprentices

1. <https://msde.gov.in/en/schemes-initiatives/apprenticeship-training/naps> [MSDE]; 2. https://dgt.gov.in/sites/default/files/Edited_EYIN2006-031_Gender_Study_1.pdf [EY, 2020]; 3. <http://164.52.210.154:8080/xmlui/bitstream/handle/123456789/1227/State-of-the-Jobs-Report-Final-Version.pdf?sequence=1&isAllowed=y> [State of Jobs in 2019, Grameen Foundation India]; 4. Estimating the economic benefits (to employer/ government) that can be attributed to the specific insight is difficult. Hence, these benefits are not included under ‘Pros’

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FSG aims to create sustainable impact by demonstrating the profitability of offering inclusive products, services, or practices

Mission

To improve **opportunities, agency, and choice for families with low-income** by working with companies to serve families as customers (and not with non-profits to serve them as beneficiaries)

Vision

To demonstrate **profitability of offering inclusive products, services, or practices** (e.g., housing, education, employment) that benefit families with low-income

Approach

- **Run multiyear programs to address barriers** that prevent companies from offering inclusive products, services or practices
- **Talk to thousands of families to understand their needs**, aspirations, and challenges
- **Talk to hundreds of CXOs and managers to understand their business**, ecosystem, regulatory and operational challenges
- **Co-create, pilot and rollout solutions with companies** to address barriers and profitably scale inclusive products, services, or practices
- **Publish and disseminate public goods** (e.g., primary research, best practices, business model) to get more companies to offer the product, service or practice
- **Address ecosystem barriers** (e.g., policy suggestions) to make the market more conducive

GLOW's Vision, Mission and Goals



Vision

- **Improve gender equity in India** by economically empowering women



Mission

- **Sustainably place 1m+ women** from households with low-income¹ in jobs **by shifting companies' mindset and practices**



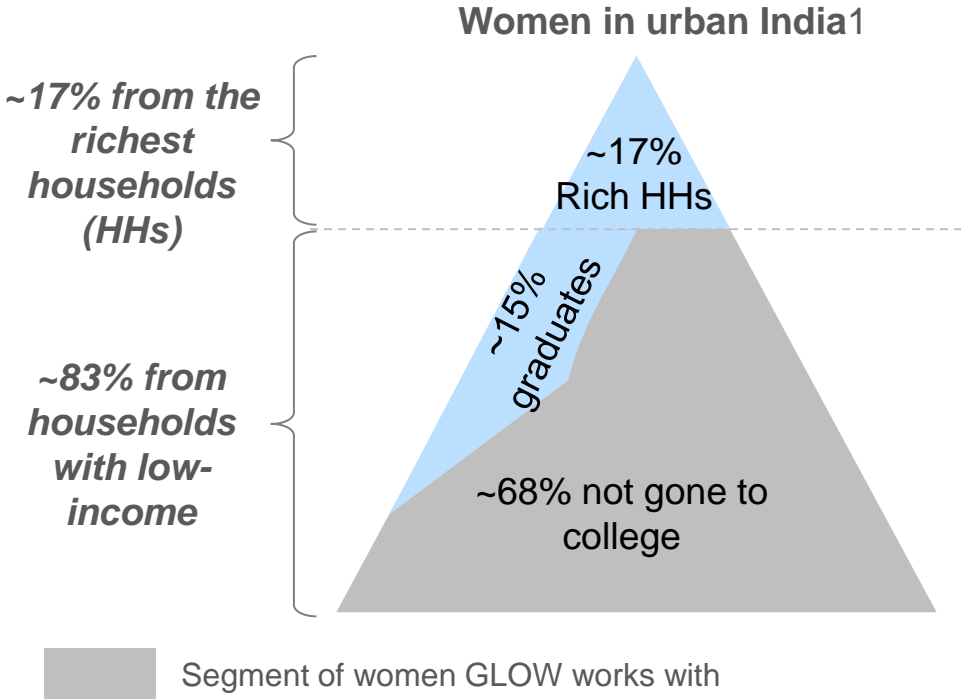
Goals

In 6 years:

- **Place 100,000 women in jobs** across 2-3 high-growth industries
- **Increase women's workforce participation by 6%** across partners²
- **Make it easier and less risky for these industries to increase women's workforce participation** by publishing best practices and demonstrating the business benefits of employing women

1 – Households belonging to socioeconomic classes A3 or below under the New Consumer Classification System (NCCS). These households have an average monthly household income of INR 18,000 (USD 240) and below | 2 – Companies that are collaborating with GLOW to increase women's recruitment, retention, and promotion

2 of 3 women in urban India come from low-income and low-education backgrounds



To meaningfully increase women's workforce participation, women from low-income and low-education backgrounds need to be employed

1. Households belonging to socioeconomic classes A3 or below under the New Consumer Classification System (NCCS). These households have an average monthly household income of INR 18,000 (USD 240) and below

Family and societies restrict women from taking up employment opportunities

Primary insight

Supporting insights

1 84% of women need to secure permission to work

- A** 84% of women need to secure permission prior to deciding to work
- B** For 1 in 3 women that are neither working nor seeking a job, lack of permission or precedence is the primary reason for not working

2 Family attitudes are progressive in theory, not in practice

- A** While >90% decision makers believe it is important for women in society to work and that it brings pride to the family...
- B** ...1 in 4 prefer if women in their households did not work at all
- C** 69% of key decision makers firmly believe that the main role of a woman is to take care of the home and children

3 Most families prefer entrepreneurship but, most women prefer jobs

- A** 3 in 4 decision makers in the family prefer that women work from home or start a business so they can also manage house work
- B** 2 of 3 aspiring-to-work women prefer jobs over entrepreneurship
- C** 93% women want fixed salaries over daily wages

4 11% of women are willing to use paid day care services

- A** Both women and key decision makers believe child care is primarily the mother's and families responsibility
- B** 51% of women are aware of paid day care services, 11% are willing to use services and only 1% have used the services
- C** Of the 15% women that cited lack of affordability as a reason for not using paid day-care services, ~50% are willing to use Anganwadi services¹

Note: Unless explicitly mentioned, 'women' in this document refers to women aged 15 and 59 years from households with low income (i.e. households having an average monthly household income of INR 18,000 or USD 240 and below) in urban India. Data source: FSG's interviews with 6,600 women and 550 key decision makers from urban households with low-income in 16 cities across 14 states in India. 1. Anganwadis are government-run child care and development centers set up under the Integrated Child Development Services Scheme of the Central Government of India. Provision of Anganwadi service is free.

Despite this, women in urban India want to work in jobs and are confident in their abilities to do these jobs

Primary insight

5

1 in 2 women in urban India want to work in jobs

Supporting insights

- A** Women in urban India want to be in jobs; 1 in 2 women are either working in a job or seeking one
- B** 88% of women believe a mother could work outside the house
- C** Women with children >6 years and those that know other working women are among the most likely to be in a job
- D** 72% of women strongly believe that they should not prioritize children and household over thinking about working

6

Women want to work to be self reliant and are confident in their abilities

- A** 64% of women strongly agree that for a woman to be self-reliant it is important to work
- B** Supporting own and family expenses is the key reason for >90% women to start seeking jobs
- C** 87% of women are optimistic about their ability to pick up new skills

7

Some women are willing to work in non-traditional and male dominated workplaces (e.g., warehouses)

- A** Some segments of women are more amenable to be in a job (e.g., women with low education levels, strong working culture and child >6 years are most willing to work in warehouses)
- B** 70% believe they would be comfortable talking to strangers (including men)
- C** 1 in 2 women are comfortable working in an environment that is 90% male

Note: Unless explicitly mentioned, 'women' in this document refers to women aged 15 and 59 years from households with low income (i.e. households having an average monthly household income of INR 18,000 or USD 240 and below) in urban India. Data source: FSG's interviews with 6,600 women and 550 key decision makers from urban households with low-income in 16 cities across 14 states in India.

~1m women can be brought into the workforce by increasing women's participation in high-growth industries from 8% to 24%

Last-mile delivery



Hyperlocal delivery agent⁴



Last-mile delivery agent

Warehousing



Warehouse packer



Warehouse sorter⁵

Flexi-staffing



Retail sales associate⁶

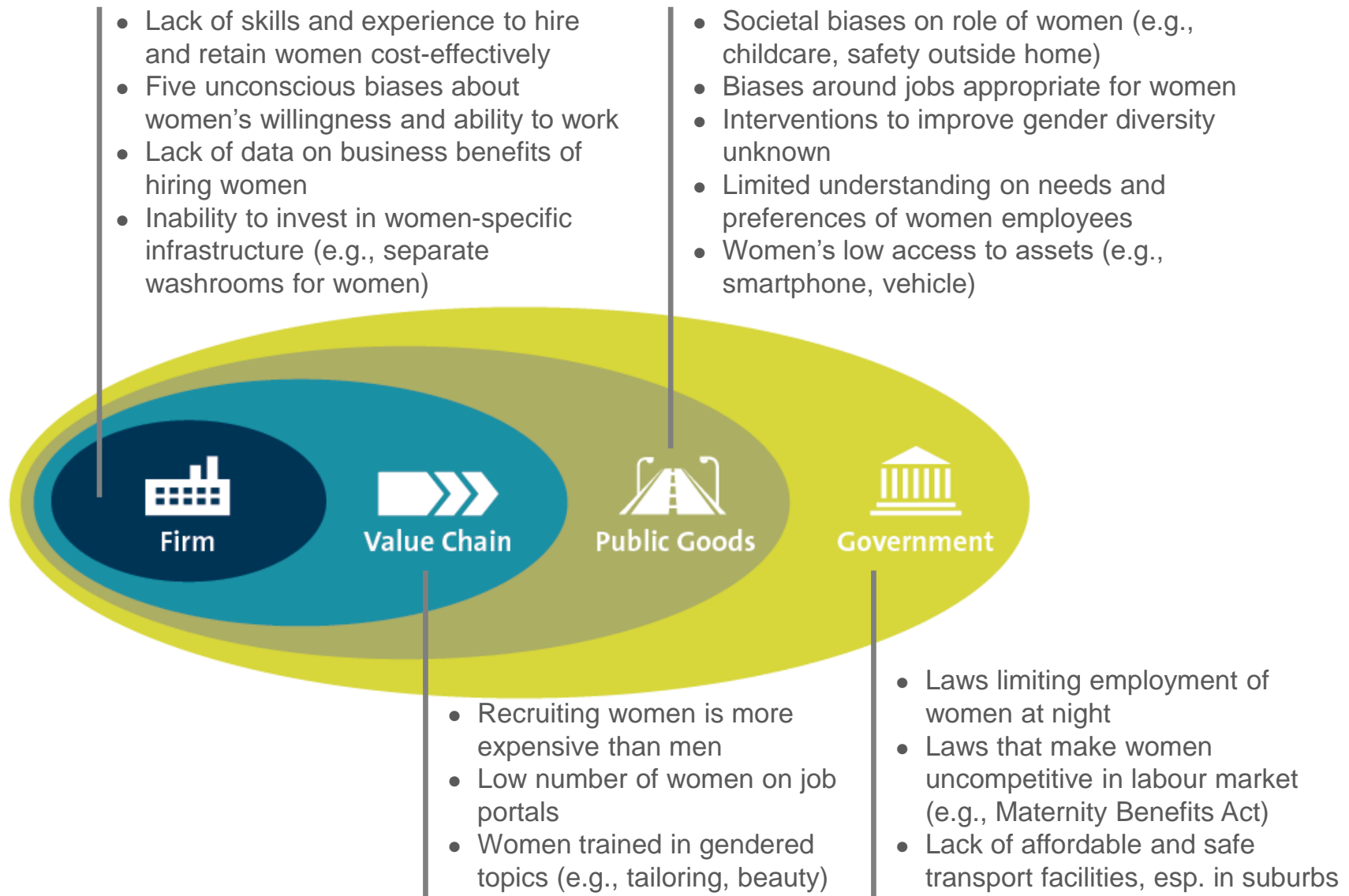


Tele calling agent⁷
and more...

- High-growth industries (e.g., Last-mile delivery, warehousing, and flexi-staffing) employed ~1.2 million workers in 2020, of which ~8% were women¹
- Many jobs (e.g., delivery agent, warehouse packer) in these industries need basic education (i.e., 10th grade completed) and on-the-job training²
- Increasing women's participation from 8% to 24% by 2030 can add 1m+ additional women in jobs³

1 – PLFS 2019-20, Indian Staffing Federation Report 2018 , 2020 and 2021 | 2 – Based on FSG's interviews with Logistics and Flexi-staffing companies | 3 – Assuming Logistics and Flexi-staffing industries could employ ~3.8 million workers by 2030 | 4-MONEY SHARMA / AFP via Getty Images | 5-Metamorworks/Shutterstock.com | 6- [IndianFaces/Shutterstock.com](#) | 7-moodboard/Brand X Pictures via Getty Images

Barriers preventing companies from increasing women's workforce participation



Most of these barriers cannot be addressed effectively by firms themselves

Firms will not address barriers because...

- **Insufficient risk-adjusted return** (e.g., lack of data on business benefits of hiring women, cost of research to understand women's needs and preferences when impact on gender diversity is unclear, cost of spending team's time when there is low confidence in returns)
- **Availability of lower cost alternatives** reduces willingness to try new strategies (e.g., cost of hiring women for delivery agent (DA) roles is 3x that for men)
- **Free rider problem** creates risks to investments in gender equity (e.g., risk of competitors poaching women from firms that invest in finding and recruiting women)
- **Competitive instinct** reduces willingness to co-operate to solve common issues (e.g., low willingness to cooperate to convince families that field roles are appropriate for women)

Firms cannot address barriers because...

- **Lack of capacity and capability** limit ability to adopt gender-equitable practices (GEPs) (e.g., designing GEPs, sequencing GEPs into a low-risk and low-cost roadmap, inability to invest in infrastructure)
- **Lack of networks** constrains ability to solve ecosystem issues (e.g., with impact investors, skilling organizations, clients willing to pay more for women)
- **Lack of neutrality** limits capability to influence stakeholders (e.g., government is less likely to change policy if firm petitions vs. if a neutral party like FSG explains the need to allow women in night shifts)
- **Biases** make it difficult to hire female talent (e.g., Societal biases on role of women or on jobs appropriate for women, five unconscious biases within firms about women's willingness and ability to work)

As an industry facilitator, GLOW is making it desirable, viable, and feasible for companies to improve gender diversity

GLOW's role

Details

1

Sign up companies

- Identify, convince and sign-up 18 companies as '*partners*'

2

Increase desirability

- Share data that women (a) want to take up jobs, (b) are comfortable working in an environment that is 90% male, (c) are willing to learn new skills in jobs

3

Increase viability

- Document and share business benefits of hiring women (e.g., higher accuracy, greater retention)

4

Increase feasibility

- Create public goods (e.g., roadmap to reduce effort, risk, and cost of implementing gender equitable practices)

5

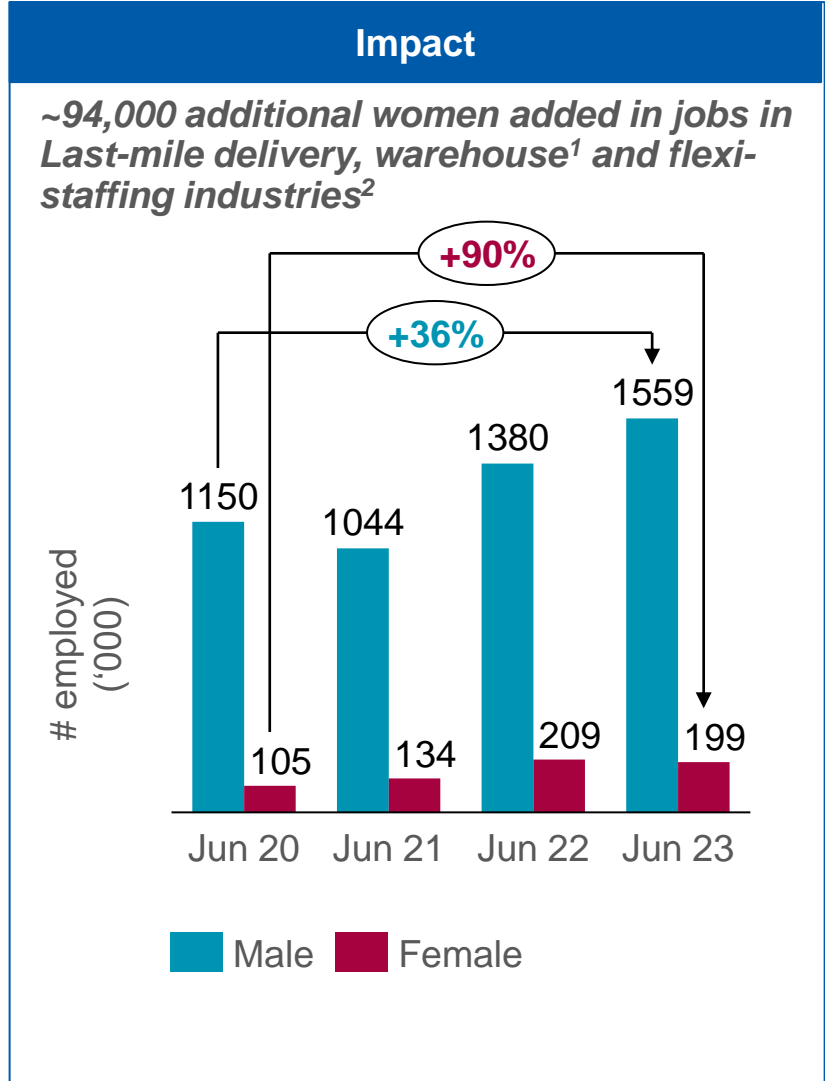
Create an enabling support system

- Develop policy suggestions to make it easier and cost-effective to employ women

Between 2020 and 2023, GLOW industries have nearly doubled the number of women in jobs from ~105K to ~200K

Partners signed up

At sign-up, partners employed ~500,000 people, and less than 1% were women



• 1- Logistics: PLFS report 2020,2021,2022 and 2023 | 2-Flexistaffing: Total workforce triangulated from ISF Annual Report- 2021, 2022 and 2023 | 3- Industries considered under Flexi-staffing: Retail, FMCG & FMCD, Logistics & E-Commerce, BFSI and Industrials

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