

Consumer Protection in Displacement Settings:

*A learning brief in protecting
energy access for all*



GOGLA:

GOGLA is the global association for the off-grid solar energy industry. Our 200+ Members provide millions of low-income and climate-vulnerable people with affordable, high-quality products and services; rapidly increasing customers productivity, connectivity, and resilience.

To enable sustainable businesses and accelerate energy access, we provide market insights, standards and best practice, and advocate for catalytic policies, programmes and investment. With the right support, our pioneering industry can improve the lives of 1 billion people by 2030.

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IOM:

Established in 1951, IOM is the leading intergovernmental organization in the field of migration and works closely with governmental, intergovernmental and non-governmental partners.

With 175 member states, a further 8 states holding observer status and offices in over 100 countries, IOM is dedicated to promoting humane and orderly migration for the benefit of all. It does so by providing services and advice to governments and migrants. IOM works to help ensure the orderly and humane management of migration to promote international cooperation on migration issues, to assist in the search for practical solutions to migration problems and to provide humanitarian assistance to migrants in need, including refugees and internally displaced people. The IOM Constitution recognizes the link between migration and economic, social and cultural development, as well as to the right of freedom of movement.

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1. INTRODUCTION: DISPLACEMENT, ENERGY ACCESS AND CONSUMER PROTECTION

In 2022 there were more than 102 million people forcibly displaced across the globe as refugees, internally displaced persons, asylum seekers, returnees etc., with the majority - more than 86% - living in developing countries. Most often, they live in protracted situations, where their displacement is long-term¹. In such displacement settings, energy access is vital for survival and to help rebuild a basic quality of life - needed in households for cooking, heating and lighting, mobile phone charging, for productive uses such as water pumping and powering businesses, and to power community infrastructure such as health centres, schools, security lighting etc.

Unfortunately, displaced populations typically lack access to clean, modern forms of energy and use of basic fuels affects their health, livelihoods, safety and wellbeing. More than 94% of displaced people do not have access to electricity and 81% rely on firewood and charcoal for cooking¹. Women and girls are also negatively impacted due to the different roles they play in the provision of energy at household level – exacerbating gender inequalities and insecurity. Access to modern energy products can improve women’s security, reduce time spent on manual labour and the drudgery of fetching water and fuel wood².

The provision for affordable, reliable, sustainable and modern energy services in displacement settings has so far been varied and limited as energy interventions have not been prioritized, funded or integrated into humanitarian response planning in a systematic way^{3 4}. Nonetheless, the picture is changing in part thanks to the Global Platform for Action on Sustainable Energy in Displacement Settings (GPA) which aims to galvanize collective action to enable sustainable energy access for displaced persons and host communities, and associated initiatives from key humanitarian response organisation such as IOM. There is now greater recognition that energy underpins every other cluster within the humanitarian response framework⁵, and that displaced people cannot become self-reliant without access to it. The delivery of SDG7 cannot be met by 2030 without the inclusion of displaced populations⁶.

To accelerate access and ensure long-lasting solutions, several initiatives are looking to market-based solutions and partnerships with the private sector. The off-grid solar (OGS) industry has grown markedly over the past decade to provide affordable, clean electricity and close the gap on the 733 million people who lack access⁷, including those in displaced settings, with several companies engaged through partnerships with organisations such as UNHCR and IOM. While

1 GPA (2022) *The State of the Humanitarian Energy Sector: Challenges, Progress and Issues in 2022*.

2 IOM *Energy Needs Assessment Report -2020*

3 Thomas, P., Rosenberg-Jansen, S., & Jenks, A. (2021). Moving beyond informal action: sustainable energy and the humanitarian response system. *Journal of International Humanitarian Action*

4 Huber, S., Mach, E. Policies for increased sustainable energy access in displacement settings. *Nat Energy* 4, 1000–1002 (2019).

5 See: www.humanitarianenergy.org/thematic-working-areas/edm-training/

6 See: *Energy for the most vulnerable remains a distant hope*, Owen Grafham, 2022.

7 *Lighting Global/ESMAP, GOGLA, Efficiency For Access, Open Capital Advisors (2022), Off-Grid Solar Market Trends Report 2022:*

evidence shows the huge benefits to consumers of off-grid solar products such as pico-lanterns, solar-home systems and solar water pumps, the industry also recognises the risks of serving low-income, vulnerable populations and acted on the need for consumer protection standards.

In 2018, the industry came together to develop the **GOGLA Consumer Protection Code** (CP Code)⁸, which defines the de facto minimum standards any consumer should expect from an off-grid solar provider. The six Principles of the CP Code include transparency, responsible sales and pricing, good consumer service, good product quality, data privacy, and fair and respectful treatment. Companies are encouraged to make a Commitment to the CP Code to demonstrate that they strive to meet the minimum standards for its treatment of customers and take action to monitor and improve their performance across day-to-day operations. The CP Code was developed to be model and product agnostic for off-grid solar market, although until now a specific 'displacement setting' lens has not been applied.

Consumer protection is important across the whole off-grid solar industry but it is vitally so in displaced settings. It is likely that end-users who have been forcibly displaced have additional vulnerabilities that distributors and their humanitarian partners need to be aware of and take mitigating actions to ensure that basic standards are maintained.

For example, displaced people may not speak the same language as their host community which heightens the risk of poor understanding of terms and conditions, usage, maintenance and customer service and requires extra effort in communicating key-facts and information to the consumer; marketing agents and those making installations in people homes may need additional training related to safeguarding; and due to geographical factors, displaced settings may have poor(er) GSM/mobile networks that can affect customers using pay-as-you-go (PAYGo) products.

Over recent years, the humanitarian sector has aligned with existing product quality standards for the off-grid solar sector and now mostly requires VeraSol quality certification for any OGS procurement or partnership. The same should be true of operational standards, and a requiring a commitment to the Consumer Protection Code for any company operating in displaced settings is a good place to start. This lessons brief takes insights and learning from IOM Mozambique's Enter Energy project and consumer protection study, and aims to strengthen consumer protection and highlight actions for the key actors working to enhance energy access in displacement settings.

1.1 Consumer protection and the Enter Energy project in Mozambique

IOM's **Enter Energy: Sustainable Energy for Displaced Communities** project sought to strengthen the self-reliance of resettled internally displaced persons (IDPs) and host community members affected by Cyclone Idai, through improved access to energy solutions. Through improved access to sustainable, clean, energy for both IDPs and host community households, the project aims to improve quality of life, strengthen livelihoods through productive uses of energy and improve the financial capacity and literacy of IDP households to pave the way towards improved bankability.

⁸ See: [GOGLA Consumer Protection Code: Safeguarding industry impact](#)

IOM has employed a market-based approach to working with both the IDPs in resettlement sites and the private sector to accelerate adoption of the clean energy technologies. The project works with OGS companies that distribute solar home systems (SHS) and productive use appliances through various models, including PAYGo⁹. PAYGo increases the affordability of OGS products for low-income consumers, though the model introduces an element of financial risk as customers enter into a long-term agreement with the company covering a period of repayment (normally ~1-2years).

With IDPs at the centre of IOM's Enter Energy project, it was important to ensure their interests are fully met in pursuit of stability and socio-economic development. The CP Principles provided IOM with a framework to assess how well the rights of the IDPs are being respected, to identify risks associated with poor consumer protection, and to strengthen the way humanitarian agencies and OGS companies mitigate such risks. IOM also sought to contribute to the implementation and uptake of consumer protection standards in other displacement settings by filling the gap in insights and awareness amongst key stakeholders.

The project included an awareness raising campaign to educate IDP consumers about OGS and PAYGo models and inform them of their rights, and a consumer survey for which IOM leveraged GOGLA's Consumer Protection assessment framework for verifying how well companies perform against the CP Principles. IOM utilized the 60 Decibels Consumer Protection Lean Data question set, a survey tool developed to translate the GOGLA Consumer Protection Code & Principles into a survey to understand end-consumers' own experiences. IOM made adjustments to the survey tool, so this is not comparable to other 60 Decibels/GOGLA data but provides insights on the IOM respondent base. The survey was conducted in seven resettlement sites in Sofala and Manica provinces in Mozambique, and included customers of three OGS companies as well as local shops.

Off-grid solar ecosystem within the resettlement sites

IOM found that several types of solar products - ranging from pico-lanterns to high-capacity component-based systems – are available within the resettlement sites.

- **Pico PV systems** were found to mostly have been distributed by humanitarian agencies during emergency response to provide light and phone-charging to IDP households. They have a capacity of approximately 5W.
- **Solar Home Systems (SHS)** available vary from component-based off-the-shelf products to plug-and-play kits offered by OGS companies. **Component-based** products included the PV panel, battery, charge controller and lights purchased individually from local electronic shops. They are mostly sold in cash with little or no technical advice, warranty or after-sales services, and are not quality-verified. Sellers of these products are local businessmen/women and do not receive support from energy market development programmes. SHS distributed by OGS companies however are usually **plug-and-play kits** with integrated battery and charge controller sized with a PV solar module and accessories (lights, radio, phone chargers

⁹ PAYGo models are a form of asset financing which increase affordability by allowing customers to pay an initial down-payment for an OGS product and make subsequent weekly/monthly payments until the price of the system has been repaid. It's the fastest growing model of distribution in the OGS industry.

etc.). SHS kits found in the resettlement sites ranged from 10W (including 2x lights and a phone charger) to 50W (including lights, phone charger and TV). Sold on cash or PAYGo, these products are quality verified¹⁰ with at least two years' warranty and after-sales services for the same duration provided by the OGS company. OGS companies in the region do benefit from the support of energy market development programmes that offer technical assistance and financing in the form of catalytic grants and result based financing.

Of the SHS found within the resettlement sites, 91% were bought within the sites and the remainder from outside. This is an indication of the presence of sales agents from OGS companies within the sites, bringing the products and services closer to the displaced communities.

Figure 1. The context of displacement in Mozambique

The context of displacement in Mozambique

In the last three years, Mozambique has experienced multiple waves of conflict and natural disasters, which have affected the lives of millions of Mozambicans and exacerbated existing challenges of insecurity, climate change and public-health risks.

The country is experiencing ever more weather-related events, including both droughts and heavy rains. The Global Facility for Disaster Reduction and Recovery (GFDRR)¹¹ ranks Mozambique the third most vulnerable country in Africa for such events. These events can be triggers for migration but can also intensify the already complex process of settlement and integration.

In 2019, two consecutive category-4 tropical cyclones hit Mozambique within a six-week period in March and April, causing extensive destruction and damage to Sofala, Manica, Tete, Zambezia, Cabo Delgado and Nampula provinces in the central and northern parts of the country. These events affected more than 1.8 million people. Based on an assessment conducted in April 2020, most people in resettlement sites (89%) still live in emergency and temporary shelters. The remaining 11 per cent have upgraded to transitional shelters (9%) and permanent houses (2%)¹². Many resettlement sites still struggle to access basic goods and services. In addition, floods and drought in Mozambique have affected the ability of settled IDP families to cultivate subsistence crops, placing them at risk of food insecurity.

Similarly, in the northern region of Mozambique, past grievances and ongoing violence have led to high levels of stress, tension and strained social coping mechanisms. The security environment in Cabo Delgado started to worsen in 2017 but escalated in 2019 and further deteriorated in 2020, when attacks and violence against civilians increased.

According to IOM, 963,631 IDPs are currently internally displaced in Mozambique (DTM, January 2023) of which 129,327 are living in 85 resettlement sites in central region and 834,304 living in 92 IDP sites and with host communities in Northern Mozambique¹³.

10 See VeraSol.org

11 See: [Disaster Risk Profile: Mozambique | GFDRR](#)

12 See: [Shelter Recovery Assessment in the Central Region of Mozambique April 2020_0.pdf \(iom.int\)](#)

13 IOM DTM Report: [MOZAMBIQUE CRISIS, IDPs by District Mobility Assessment Round 18 \(April 2023\)](#), TS Freddy (March 2023), MSLA Round 22 (Mar. 2022)

2. INSIGHTS AND LEARNING FROM MOZAMBIQUE

The following section is arranged by each of the six CP Principles, highlighting the key findings from IOMs study in Mozambique, specific risks that were identified and good practices for companies and humanitarian actors where relevant.

2.1 Transparency

Under the principle of transparency, OGS companies should (as minimum) share clear and sufficient information on the solar products, service, payment terms and personal data privacy to enable the consumer to make an informed decision about their purchase. The OGS companies are expected to share relevant information in a timely manner before, during and after the sale using language that the consumer understands. Even companies who meet this standard well in normal operations may face additional challenges if serving displaced communities who speak different languages from the host community and have low awareness of OGS products, payment models and services. Adapting operations to meet the needs of the displaced community may therefore involve translating written materials, ensuring high use of visual communications, and recruiting and training field and call-centre staff from the displaced community who can more easily communicate key terms and information to the target consumer-base.

In the assessed resettlement sites, the presence of OGS companies is notable since they account for 92% of all the SHS sold in the sites and sell through sales agents who are recruited locally, trained, deployed and paid by commission. Hence, the agents act as a link between the OGS companies and the customers, with knowledge of the spoken languages and cultural norms within the consumer-base.

“The manual is in 3 languages, but I do not speak any of them and the visual instructions do not help to understand anything in the manual.” IDP survey response.

Sixty-two percent of IDPs surveyed stated that the language and communication material were clear and understandable. While a majority, this shows that there is room for improvement to ensure that every customer is comfortable with the language used and fully understands the contract terms, the user manual and maintenance guidance for their OGS product. However, the use of local agents appears to be filling the gap as the survey found that 96% of respondents felt that they were well informed about the types of SHS on sale and their payment options and 93% felt well informed about the contract terms and conditions, including the duration of a PAYGo contract.

Despite a high number of IDPs reporting that they understood the contract, about half said they were not adequately informed by the sales agents about the possibility of future changes to the

payment plan or the consequences of non-payment (e.g., the possibility of the SHS being locked and leading to eventual repossession). A scripted 'welcome call' from a centralized call-centre (who speaks the right language) can be a useful way of following up with new customers and ensure that all the key facts are clearly communicated and the PAYGo terms are well understood.

Good practice for transparency with OGS consumers¹⁴

1. Recruit from the displaced population to mitigate language and cultural barriers. A robust training scheme for new-hires in displaced populations is also key as it's likely they will be the favoured and primary point of contact for customers within a settlement, irrespective of access to call-centres.
2. Translate communication materials into the main language spoken, wherever possible – including sales and marketing information, contracts and user manuals.
3. Use simple, clear communication that is strengthened by verbal scripts (for agents and staff), visuals and a Key Facts Statement which summarises the main contract terms¹⁵.

2.2 Responsible sales and pricing

As the off-grid industry has matured, the prevailing consensus is that to reach the poorest households (including those in displacement settings) with affordable energy solutions and achieve universal access, end-user subsidies will have an essential role to play in the 'toolkit' of financing options¹⁶. Irrespective of the mechanisms used to enable affordability, companies should take "adequate care to ensure consumers can afford to pay for the product and/or service without being overburdened" and that "consumers' characteristics are taken into account in the price, payment structure and fees of the product and/or service."

The target consumers in the Mozambican resettlement sites are IDPs recovering from the impact of cyclone Idai, and consequently the majority have very low income. As is common in displaced communities, the majority of households in the Mozambican sites have been dependent on humanitarian organizations for assistance. Support is nonetheless shrinking and IDPs have to look for alternative sources of income with the majority venturing into farming in their places of origin but maintaining their home in the resettlement sites. In this regard, the customers are vulnerable. To uphold the responsible sales and pricing principle and to avoid consumers becoming financially overburdened therefore, OGS companies need to consider what long term support is being provided to displaced consumers and the impact of future changes to such support, when assessing their ability to pay over time.

The survey found that 14% of respondents considered the monthly payment a heavy burden 44% somewhat a burden and 42% do not consider the monthly payment a heavy burden on

14 See GOGLAs Transparency Briefing Note: www.gogla.org/wp-content/uploads/2023/05/gogla_briefing-note-ccp-data-privacy_def.pdf

15 Template KFS for PAYGo Companies: www.gogla.org/wp-content/uploads/2023/05/gogla_briefing-note-ccp-data-privacy_def.pdf

16 [GOGLA 2021, Discussion Paper: How End-User Subsidies Can Help Achieve Universal Energy Access](#)

their monthly budget. The 60 Decibels Energy Benchmark¹⁷ for consumers reporting repayments a 'heavy burden' is 4% - so this finding shows that more work is needed to ensure vulnerable displaced consumers first, have access to affordably priced SHS, but second, that companies are diligent in their assessment of ability to pay.

Assessing the ability to pay of IDPs is no doubt challenging, given that their income is likely to be low, irregular and unpredictable. From the survey only 28% of the respondents reported being helped to assess their ability to pay. Nonetheless, going through this process during a sale is important to help customers understand the impact of PAYGo repayments on their monthly household budget. Humanitarian agencies are encouraged to work with OGS companies to support the design of this process and ensure that the nature of displaced households' income and financial support from humanitarian agencies is understood and fully accounted for.

The flexibility offered by PAYGo schemes however was appreciated by respondents as they were able to make regular but small payments with the money that they do have available. See the quote below from one of the respondents:

"I like the system, it is very good, because even if you only pay for two days it accepts. It allows you to pay and use the device according to the amount you have." IDP survey response.

Good practices for responsible sales and pricing

- Increasingly, sales agents are incentivised not just for the sale but for the long-term repayment rates of their customers. It's important that agents are well trained on how to help consumers work out their ability to pay for a system and that the product selected is priced within an acceptable range for the consumer's income level. This not only ensures that consumers are not financially overburdened, but that agents are also more likely to benefit from long-term repayment. Consider what tools can be helpful for agents to undertake this assessment in the field, such as a calculator template.
- Additional training for sales and other consumer-facing staff who play a role in assessing ability to pay (e.g., call centre staff) and work in displacement settings, is advised. Training should highlight the unique financial vulnerabilities of displaced households and additional steps in the process, if needed, to ensure that consumers are not financially overburdened. Humanitarian agencies can help to design and implement this training.

2.3 Good consumer service

Good customer service is essential in ensuring long-term impact for consumers of off-grid energy products. With PAYGo business models, it also ensures that companies get paid, and builds trust with consumers. Under the good consumer service principle, OGS companies are expected to ensure the availability of after-sales service support including warranty and post-warranty service for a reasonable period of time, and have in place an effective and easily accessible consumer

¹⁷ [60 Decibels | Energy Benchmarks](#)

complaint mechanism with short turnaround time for problem resolution. Companies should also provide proper instructions on the use and care, safety risks related to the use and disposal of their SHS.

SHS products that are quality verified are required to come with a warranty of at least 12 months if <10w and 24 months if >10w. The warranty should also be at least as long as the repayment period for PAYGo systems. In the survey undertaken by IOM, 90% of respondents reported that they received a warranty for the SHS they purchased, 5% claimed not to receive and 5% did not know if the SHS have a warranty. All those that were reported as being sold without warranty were off-the-shelf, component based systems.

The reported warranty periods varied from a week to up to 3 years. Off-the-shelf products came with the shortest warranty periods varying from 1 week to 1 year, while OGS companies distributing quality-verified SHS kits provide the longest warranty period, of up to three years and all while the customer is still paying for their system. That off-the-shelf component-based solar product often did not come with a warranty or only a very short warranty, demonstrates the importance of ensuring first, that products available to vulnerable people are quality verified, but second, that the communities are also aware of their rights and what to look out for when selecting an energy product or supplier. IOM in Mozambique sought to mitigate this through a consumer awareness campaign, an initiative that other humanitarian agencies could also consider.

When consumers do experience an issue with their SHS, it's important that they can easily report it to the company and that the problem is solved quickly. Of the 107 IDP consumers surveyed 23 respondents had experienced challenges using their solar products. Of these, 9 (39%) reported that their issue was not yet resolved at the time of the survey - with four having waited for more than 30 days. The IDPs that had had their issues resolved had waited from one day up to thirty days. 39% of unresolved challenges is only slightly higher than the 60 Decibels Energy Benchmark for SHS (34%) – but a consumer waiting more than 30 days for an issue to be resolved is unsustainable, especially if the product is being used to support livelihoods and education. Providing efficient aftersales services in displacement settings may, however, bring additional challenges such as ensuring access to technical skills and spare parts in more remote areas. Humanitarian agencies and OGS companies can work together to adapt aftersales services to the local context, and evaluate the existing ecosystem of informal repair facilities that could be utilised.

Some respondents provided feedback on their dissatisfaction about price changes, poor communication, need for better information on their rights and responsibilities and the consequences of late/no payments, and time taken to address challenges. Others expressed satisfaction that the products were available via PAYGo and their interactions with sales agents.

“I would like to receive messages from the company about discounts, and in case of advance payment I would like to have discounts. I would like to be treated like any other customer who always pays the monthly fees.” IDP survey response.

The final part of the CP Principle for good consumer service is to ensure that measures to enable continued operability of the product in the event of failure of the company, are considered. In displacement settings, we should perhaps consider this principle not in respect of failure of the company, but in the case of a company needing to pull out of operating in that particular region (e.g., due to changing security context), or the longevity of the settlement.

Good practices for provision of good customer service

- Ensure that a free-to-call phone number is available at critical times of the day to provide consumers with assistance when they are most likely to need it (e.g., the hours of 5pm to 11pm when systems are most used). Where possible, recruit call centre staff who are able to speak the most common languages spoken by displaced Persons.
- Humanitarian agencies working with providers of off-grid solar can ensure that the partners they select provide adequate product warranty for consumers, and support companies to design and implement local servicing facilities.
- As with many OGS consumers, the PAYGo agreement may be the first contract signed by a customer who has been forcibly displaced. Responsible OGS companies pay particular attention to explaining the terms and obligations of both parties – but together with the support of humanitarian agencies, tailored consumer awareness campaigns can help sensitise new customers and inform them about their rights and expectations for customer service.

2.4 Good product quality

The humanitarian sector in the last few years has recognised the need for and adopted quality certification of off-grid solar products in both procurement and partnership models. The CP Principle for good product quality is mostly met if the product supplied is VeraSol certified. Under the Principle, OGS companies are expected to ensure the SHS products/services offered are of good quality, appropriate, safe to use and perform as expected. They should ensure longevity of products (including ease of operation and maintenance, repairability and durability).

As before mentioned, most products available in the resettlement areas and purchased by IDPs who took part in the survey were plug-and-play, quality verified systems supplied by OGS companies. Though there was a range of products with various capacities and serving different needs. Off-the-shelf component-based systems are higher risk as they are less likely to be quality certified and require technical knowledge for assembly.

Even high quality, easy to use off-grid solar products needs some maintenance to perform at their best over their lifespan. A user manual helps to inform consumers on how to maintain their SHS, such as cleaning the panel and good practice for discharging the battery. From the survey conducted, 82% of respondents received a manual - with 68% of those confirming that it included elements on how to install, operate, maintain and troubleshoot, as well as health and safety advice for the product.

Of those that received the manual, 50% confirmed that the manual made it easier to understand the device.

“The manual helped me a lot because it had a good explanation for the use of the system. For example: it explains that cannot connect with other devices that are not of the system itself, otherwise it can cause electrical shock and burst on fire”

Ensuring good quality products for displaced communities

- Providing market sensitisation and consumer education can help empower displaced persons to consider the quality of products available to them and make informed decisions themselves. While requiring quality certification from any OGS company engaged in procurement and market-based programmes ensures high quality products reach the settlement areas, educating consumers can also help to mitigate against poor quality products that may be available in local / informal markets.
- The management of e-waste is rising up the agenda of humanitarian agencies and OGS companies alike. Even the best quality products will eventually reach end-of-life, and so stakeholders are encouraged to consider the provision of repair and take-back to help reduce e-waste and reduce the likelihood that OGS products will contribute to the growing e-waste problem.

2.5 Fair and respectful treatment

Displaced people often have additional vulnerabilities that are exacerbated by their living conditions and insecurity. The CP Principle of fair and respectful treatment is therefore very important for companies working in displaced settings. All OGS consumers (current and potential) should be treated with respect and fairness regardless of gender, race, religion, social status or ethnicity. Companies should also ensure that adequate safeguards are in place against corruption and abusive treatment. In displacement settings, companies are encouraged to consider (with advice from partnering humanitarian agents) what additional training or safeguarding may need to be implemented for consumer-facing staff working in these regions.

The management, training and incentivisation of agents is known to be one of the most challenging yet critical areas of operation for ensuring high standards of consumer protection in off-grid solar. Agents have a difficult job, often working alone and responsible for collections as well as sales. Training and coaching on not only how to treat customers but also how to respond if met with conflict or abuse themselves, is critical; as is monitoring of agent and customer safety. In the IOM survey, three (<3%) of respondents reported negative treatment, including use of abusive language and arguing with an agent about repayment. While only a small number, issues such as this should be investigated by an OGS company when identified.

Good practices for safeguarding consumers

- Train, measure and monitor. Fair and respectful treatment for 100% of consumers is the aim, and robust training for customer-facing staff, combined with a feedback mechanism (e.g., random customer surveys) and regular monitoring can help companies achieve it. In displacement settings, training should pay particular attention to unique vulnerabilities of potential consumers and humanitarian partners can support with the identification of any additional safeguarding needs.

2.6 Data privacy

In an increasingly digital world, data privacy and protection is an area of growing risk for all. OGS companies – particularly those distributing PAYGo products – collect a volume of consumer data that helps them to assess ability to pay and improve their service, but this should be done with consumer consent and with minimal exposure. Companies should apply the same data privacy standards that they employ in their regular operations. GOGLA published a briefing note, “Building Trust with OGS Consumers Through Better Data Practices¹⁸,” to help guide OGS companies and other key stakeholders on implementation of this Principle.

Ensuring data privacy for displaced people

- Ensuring that data of existing or potential customers is fully protected is important, and may require provision of suitable tools (e.g., smart phone or tablet device which can be locked and access secure data management software) for local staff.
- Beyond securing data that is stored by companies, data privacy is really about consent for what is considered legitimate use. The transparency principle is therefore relevant and the same advice applies in ensuring that consumers fully understand the implications of sharing their data with an OGS company.

¹⁸ See GOGLAs Briefing Note on Data Privacy: www.gogla.org/wp-content/uploads/2023/05/gogla_briefing-note-ccp-data-privacy_def.pdf

3. CONCLUSION : PROTECTING DISPLACED PEOPLE WHILE MEETING THEIR ENERGY NEEDS

In off-grid solar and PAYGo business models, consumer protection underpins business success – a customer simply will not repay if they are unhappy with the product or treated poorly by a company. This principle is no different in displacement settings and responsible OGS companies that partner with humanitarian agencies should apply the same Principles of Consumer Protection as in any other setting. Nonetheless, there are additional vulnerabilities and risks that underpin the application of the Principles in such settings, and humanitarian agencies can help companies understand and mitigate the risks.

The survey that IOM carried out in Mozambique highlighted some of the more difficult aspects of providing energy access solutions not just in displacement settings but in the wider market context too. For example, the transparency of customer contracts, and how to effectively convey key terms and conditions to customers who speak a multitude of languages, have low levels of literacy, and are unfamiliar with legal contracts is a challenge. Companies are meeting the challenge through a combination of written, visual and spoken communication. The survey also showed that providing fast and efficient aftersales services in remote and possibly volatile regions can present hurdles for OGS companies and consumers in displacement settings, while adapting and strengthening training for customer-facing roles could benefit from the support of humanitarian agencies.

GOGLA encourages all OGS companies to make a Commitment to the Consumer Protection Code and to regularly review how they are performing against the Principles using the 37 indicators included in the CP Self-Assessment Tool. While the CP Code is designed to be applicable in all energy access settings, the Indicators can be used by humanitarian agencies and OGS companies working in displacement settings as a framework to help identify where the risks to consumers may be heightened or unique, and additional mitigation measures put in place.

The initiative undertaken by IOM in Mozambique has highlighted the importance that humanitarian agencies start to adopt consumer protection standards in the same way they have adopted product quality standards, and identified the following key take-aways for replication in other displacement settings:

- The project identified a gap in knowledge and awareness of the Consumer protection Code and standards for OGS companies within the humanitarian sector. Humanitarian actors working on energy access therefore need to be sensitized on consumer protection risks, mitigation measures and standards.
- Adoption of the Consumer Protection Code should be a minimum requirement for partnerships supporting market-based energy access solutions.

- Consumer awareness campaigns on clean energy technologies in displacement settings should include education on the themes of consumer protection, to ensure that displaced communities understand their rights as consumers of clean energy products. This is particularly important where PAYGo models are also being introduced, which adds the additional element of financial risk.
- Where humanitarian actors partner with OGS companies to provide market-based solutions to energy access, sensitization of the OGS companies by humanitarian actors is advised to ensure that companies are aware of the humanitarian principles and the particular protection needs and situational context of the displaced community being served.

