



# Meeting women's energy needs is good for business: Why good consumer protection needs a gender lens



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## **Disclaimer**

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**Introduction:  
No Consumer  
Protection without  
Gender Inclusion**

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# Introduction: No Consumer Protection without Gender Inclusion

Every consumer should be equally protected – regardless of gender, age, ethnicity, religion, disability or any other characteristic. Despite women making up half of the world’s population, they are – in many sectors – less well protected as consumers than their male counterparts. Because many commercial industries have male-dominated workforces, and lack a meaningful gender-lens, the design and testing of products we use in our daily lives are often informed by the needs and characteristics of men. The consequences for women can be an inconvenience – such as difficulty using a modern phone due to increasing handset sizes<sup>1</sup> – or a life-threatening risk – like being significantly more likely to be seriously injured in a car crash due to inadequate seatbelt design.<sup>2</sup> Furthermore, in an increasingly digitalised world, algorithmic and AI innovations have the potential to mitigate unconscious biases but only if the technology, data and processes used to create and inform these systems are free of bias themselves, rather than reflecting existing human prejudice.<sup>3,4</sup>

Since launching the [GOGLA Consumer Protection Code](#) in 2018, the off-grid solar (OGS) industry has made strides in improving standards of consumer protection (CP) for OGS consumers in countries across Africa and South Asia. [A growing number of adoptions to the CP Code](#) indicate that the

industry is taking responsibility for consumer rights, even in markets that lack appropriate regulation. The industry also has an increasing ambition to be gender-forward and inclusive. Companies have worked hard to improve product quality, aftersales services and education for customers about product use and payment terms – though there is recognition that there is still more to do if the industry will reach and sustain access for the more than 700 million people who still lack access to electricity.<sup>5</sup>

In 2023, as part of a broader aim to promote a gender-forward OGS industry, GOGLA launched a project to review the Consumer Protection Code with a gender lens to ensure that consumer protection is strengthened equally for all. SDG7 (universal energy access) can only be meaningfully met if SDG5 (gender equality) is also addressed: women often bear the brunt of energy poverty as they are disproportionately responsible for provision of fuels and energy-intensive household chores.<sup>6</sup>

Pay-as-you-go (PAYGo) models have significantly increased the affordability, reach and impact of OGS products, but the dominant business model also comes with financial, product and service risks for consumers – some of which may be heightened for women who are likely to have lower levels of



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- 1 Petter, O. (2018). [Apple criticised for designing phones ‘too big’ for women’s hands.](#)
- 2 Dimova, M. (2023). [Revolutionizing product design in financial services. Women’s World Banking Women-Centered Design Methodology](#)
- 3 Kelly, S. & Mirpourian, M. (2021). [Algorithmic Bias, Financial Inclusion, and Gender A primer on opening up new credit to women in emerging economies.](#)
- 4 Berkeley (2021). [How Artificial Intelligence Bias Affects Women and People of Color.](#)
- 5 Lighting Global/ESMAP, GOGLA, Efficiency For Access, Open Capital Advisors (2022). [Off-Grid Solar Market Trends Report 2022: State of the Sector. Washington, DC: World Bank.](#)
- 6 ENERGIA (2023). [Why Gender and Energy.](#)



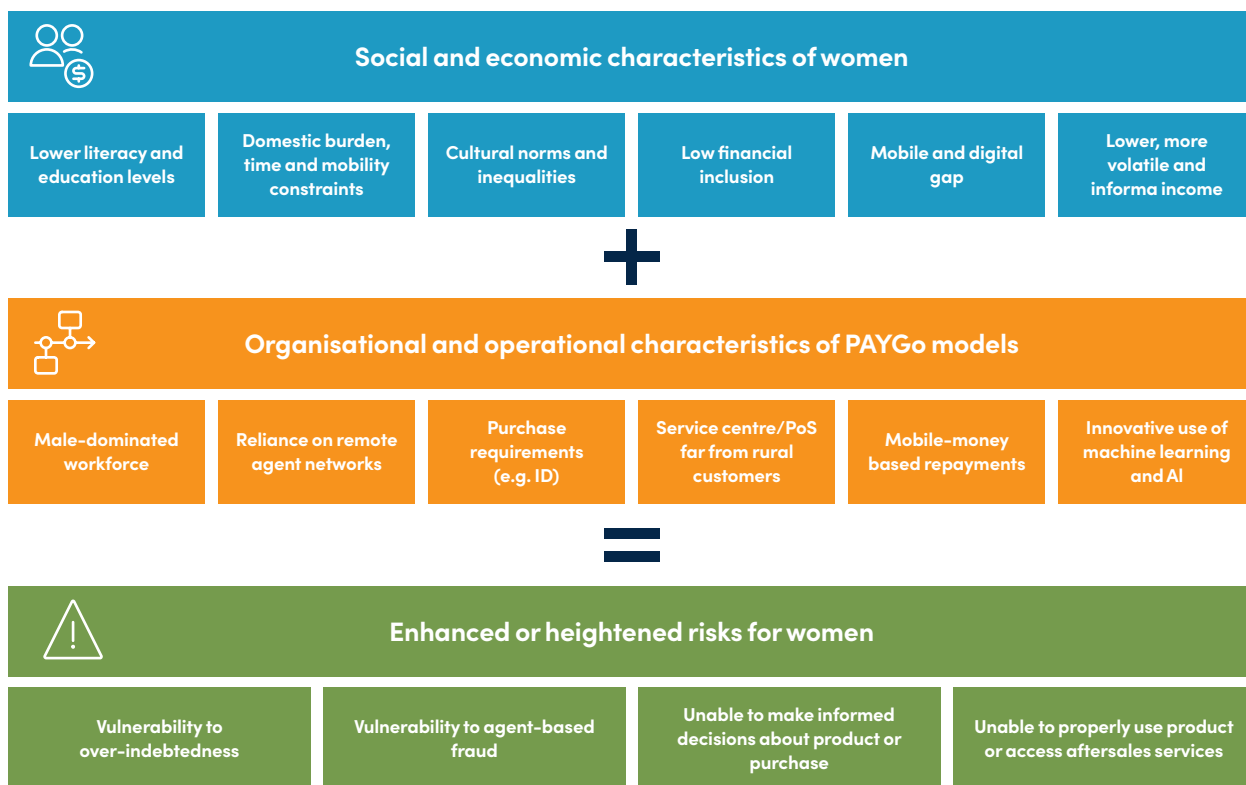
# Introduction: No Consumer Protection without Gender Inclusion

literacy, less likely to own a phone, less likely to have access to the internet, banking or mobile money, and more likely to be affected by fraud and cultural and algorithmic biases. Research in the Digital Financial Inclusion (DFI) sector shows that consumer risks are higher for rural, low-income women,<sup>7</sup> who are more vulnerable to agent fraud, algorithmic bias, and social norms that inhibit access to and utilisation of redress systems. Furthermore, both human and machine credit scoring systems in the financial inclusion sector have shown to have bias against women – who are demonstrably better payers, yet more likely to have credit applications denied.<sup>8</sup> There are many similarities between the DFI and OGS

sectors – and if we are to adequately improve and uphold consumer protection standards for all, and realise the business benefits and impact of doing so, we need to recognise and address the different and sometimes unique vulnerabilities, risks and outcomes that women face as OGS consumers.

This briefing note shines a light on gender-specific risks faced by women OGS consumers, links them to the six consumer protection principles, and highlights good practices that can be employed by companies to ensure that their efforts to improve consumer protection has gender inclusion at its heart to improve both impact and business performance.

**Figure 1 - Women face unique and heightened risks as consumers, which are affected by socio-economic norms and some characteristics of OGS operational models.**



7 Chalwe-Mulenga, M., Duflos, E., & Coetzee, G. (2022). *The Evolution of the Nature and Scale of DFS Consumer Risks A Review of Evidence*.  
 8 Mehrdad Mirpourian, M., Fu, J., & Kelly, S. (2024). *Check Your Bias! A Field Guide for Lenders*.

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**Socio-economic  
vulnerabilities  
for women  
consumers**

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# Socio-economic vulnerabilities for women consumers

**Gender-disaggregated data is lacking in the OGS industry, but we know that around 30% of customers are women,<sup>9</sup> and in many more households they are likely to be the primary user of a solar home system (SHS) or lantern. We also know that women in OGS target markets often have lower financial literacy and digital skills than men, and are affected by social norms that limit how/when they can engage with companies. Broadly categorised by social and economic factors, understanding these risk-enhancing characteristics is essential to designing effective practices for better consumer protection and strengthening business performance..**

## Social factors

### Lower educational and literacy levels amplify consumer risks for women

Though the gender gap has been closing in previous years thanks to growing rates of school enrolment, women still have lower levels of literacy and education than men.<sup>10</sup> Globally, the literacy gender gap is now at 7%, but in low-and-middle income countries (LMICs) it can be as much as 15%<sup>11</sup>. Women also have lower levels of digital and financial literacy. In one study in Cote d'Ivoire, women were almost twice as likely to need help using digital financial services than men.<sup>12</sup>

Purchasing an SHS is a major outlay for many customers, and the PAYGo contract is often the first time the buyer has signed a contract. If a customer cannot fully understand the product specifications, terms and conditions of the repayment plan, or easily use the digital interface, then the risk of over-indebtedness, payment default or having challenges using the product are increased. Further to this, many PAYGo business models now rely on the ability of customers to make payments via a mobile money service, which can be difficult for women who lack digital and financial literacy. Evidence from the DFI sector, and anecdotally in OGS, indicates that women who can't confidently use mobile money are more likely to ask others to help, sharing their PINs, or paying in cash to an agent which can increase vulnerability to fraud.

### Lack of time and mobility constrains women's access to OGS services

Women (and girls) often bear the majority of a household's domestic burden, including the

provision of energy, food and water.<sup>13</sup> For the most vulnerable this is being further aggravated by the impacts of climate change, which means even more time is spent on these chores. In Africa, women spend up to 4 times more hours on unpaid care and domestic work than their male counterparts,<sup>14</sup> and their agricultural work is primarily for subsistence and thus also unpaid.

Time poverty is compounded by mobility constraints, which in turn are made worse by affordability and accessibility constraints. When women travel, they tend to go less often, and less far,<sup>15</sup> and are more reliant on inefficient public transport than men. As a consequence of time and mobility constraints, women have less access to off-grid solar energy providers – both before and after purchase. Pre-sale, this may mean a lack of choice and competition available to them which risks low-income rural women paying higher prices for products that are poorly matched to their needs. Post-sale, women who have less free-time and are less able to travel to service-centres may therefore lack decent access to aftersales services.

Time and mobility constraints may therefore contribute to the difference in resolution rate between women and men who report an issue with their OGS product, especially if they need to travel to a repair/customer service centre. Consumer data from GOGLA's previous work shows that although there is little difference between reported issues, women are more likely to say their issue is unresolved than men.<sup>16</sup> When aftersales challenges go unresolved, consumers are left in the dark, cannot benefit from their OGS products, and risk default.

9 60 Decibels (2022). *Off-Grid Energy Benchmarks*.

10 The World Bank (2023). *Literacy rate, adult female, adult male*.

11 The World Bank (2023). *Gender data portal*.

12 CGAP, 2022. *Strengthening Consumer Protection in Digital Financial Services* ([findevgateway.org](https://findevgateway.org/)).

13 ENERGIA (2023). *Why Gender and Energy*.

14 Our World in Data (2022). *Time spent on unpaid care and domestic work, women vs. men, 2022*.

15 Gonzalez et al., (2022). *Improving women's mobility: it's not just about the quality of buses*.

16 Data from GOGLA and 60 Decibel's study of Consumer Insights During COVID-19, undertaken in 2020 with more than 5600 customer voices listened to.

# Socio-economic vulnerabilities for women consumers

## Decision-making powers are affected by social norms and lack of information

Entrenched gender-norms in many rural, low-income households often exclude women from key decisions. Although women may have most to benefit from household solar electricity – such as facilitating domestic tasks after dark, saving time in agricultural work, enhancing feelings of safety, etc. – they are often not the ones deciding to buy OGS products and individual decision-making power can be low. It is common for women to need permission from their partners when key (purchasing) decisions are made, or when for example they need collateral for an investment. Also impacting a woman's ability to make crucial purchasing decisions is the information gap, caused by lower access to community groups and digital networks, time and mobility constraints. A lack of information increases the difficulty in making comparisons necessary for informed decisions or risk of being mis-sold.

Nonetheless, when companies focus on reaching women consumers, there is evidence that they are able to influence household decisions and purchase of OGS products that meet their needs and wants (even if the eventual 'customer' on record is not the woman herself).<sup>17</sup>

## The mobile gender gap excludes women from a digitally enabled PAYGo market

GSMA reports annually on the mobile gender gap,<sup>18</sup> with latest data showing that over 400 million women did not own a mobile phone in 2023 (a 7% gap). This gap grows to 17% for smartphone ownership, and women are 19% less likely to use mobile internet, making it also less likely that they will use any form of mobile money service. Phone sharing is also relatively common for low-income, rural women,<sup>19</sup> for reasons including social norms, financial resources, network downtime, or access to/illiquidity of mobile money agents. This means that companies may not be able to easily contact women customers, or that customers expose themselves to risky behaviours such as sharing personal information or account credentials.

## Economic factors

### Financial inclusion of women remains low

Women make up the majority of all unbanked adults, facing various barriers to access, a lack of trust in the financial system and lower rates of financial literacy. In Sub-Saharan Africa, women report having difficulty participating in financial systems independently and one-third of mobile money account holders are unable to use their account without help, with higher likelihood for women.<sup>20</sup>

While the PAYGo model's dependence on mobile money described above means women are less likely to apply for/easily access OGS products, low financial inclusion more broadly leads to lower financial skills amongst women consumers which may affect their ability to understand PAYGo repayment terms and make a realistic assessment of their own ability to pay. Without fully understanding the terms or being independently able to manage repayments through financial management, risks of fraud and over indebtedness increase.

### In practice: Improving the payment process through targeted support

Through continuous evaluation of their after sales operations in Uganda, BrightLife learned that their women customers in particular are less likely to own a smartphone and may struggle to understand the product user interface and mobile-money based payment/activation process.

To address this and improve the consumer experience for their women customers, they strengthened training for agents on how to explain the payment process, and introduced a process where if needed, agents are able to intervene and support customers to activate products – reading out the digital codes for them.

17 USAID, (2019). *PEG Africa Case Study*.

18 GSMA (2023). *The Mobile Gender Gap Report*.

19 Research by CGAP in Côte d'Ivoire and Senegal (2022) found that women are more likely to share a mobile phone than their male counterparts.

20 FinEquity (2023). *How can we design Consumer Protection That Builds Women's Trust?*



## Socio-economic vulnerabilities for women consumers

### Income levels among women are lower, more volatile and informal

Entrenched gender norms, lower education and literacy levels and the burden of unpaid domestic labour mean that women's earnings are on average lower than their male peers. Income earned by women in low- and middle-income countries is often also more volatile and more likely to be earned through informal work, meaning that ability to pay assessments undertaken by companies may be less suitable. To avoid over-indebtedness while protecting access, companies need to ensure that women have a choice of products that meet both their needs and means – and that a robust and appropriate ability-to-pay assessment is in place at the point of sale with a meaningful framework to monitor ongoing ability

to pay throughout the repayment term. For the sector as a whole, well designed, gender-forward subsidies that support quality access for people with lower incomes will be instrumental in reaching SDG7 and ensuring universal energy access.

The social and economic characteristics described above are interlinked and amplified by each other. For example, lower levels of literacy and education lead to lower digital and financial skills, lower income, and less decision-making power. Unfortunately, a combination or consecution of such factors amplifies the risks for women consumers. Companies that understand these are better placed to ensure high consumer protection standards are upheld across their consumer base.



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Looking at OGS  
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# Looking at OGS models through a gender lens

**By looking at the PAYGo model through a gender lens, we can better understand how the above risks and vulnerabilities for women may be exacerbated, and how companies can take steps to mitigate and support women customers.**

## Organisational factors

### Male-dominated workforces can reinforce gender bias

The OGS sector workforce is male-dominated with studies showing that only 27% of employees in decentralised renewable energy are women.<sup>21</sup> Among GOGLA's own membership, women make up less than half of the workforce in 88% of companies. ESMAP (2022) also found that most agent positions in the OGS sector are held by men, who are less successful at reaching, engaging and supporting women – and as a result, promotional campaigns and consumer data are often skewed toward men.<sup>22</sup>

Product design, marketing and sales functions are often not prioritising women as a business segment, meaning that products, services and purchases do not reflect the needs and preferences of women. Not only does this result in companies missing out on a significant customer-base, women are missing out on the benefits that an SHS or Productive Use of Renewable Energy (PURE) product can bring to quality of life, livelihoods, education and health.

### Lack of gender-sensitisation and training alongside strong social norms

Where social and cultural norms strongly favour men and the workforce is male-dominated, women consumers can experience power imbalances during interactions with staff, or service delivery that is patronising to them.<sup>23</sup> This could be particularly acute in situations where a customer has missed a payment or has an issue with their product. Though companies across the industry are starting to adopt gender mainstreaming, operational realities need to be recognised – the social (and religious) norms affecting customers also often impact the agent workforce, and investment in training and sensitisation needs time and resources that are not always available. The CP Code principle of Fair and Respectful Treatment in part aims to help companies identify

and address the risk of power imbalance in such conversations, but when women do not feel understood or safe, they are also less likely to seek to redress any issues. In the financial inclusion sector, research shows that women are significantly less likely to contact their provider if they have a problem and that the chance of a complaint made by a woman being acted upon by agents, was smaller still.<sup>24</sup>

## Operational factors

### Last mile, rural markets rely on remote agent networks that are difficult to control and manage

OGS providers striving to reach SDG7 goals operate in last-mile, remote areas where the need for access to clean, affordable energy is greatest. To do so, the dominant model relies on networks of remote sales agents that are challenging to train, monitor, and manage. Although companies employ a variety of methods to manage and improve the quality of agent networks, the risk that agents do not communicate key information to potential customers; that they mis-sell products and services to secure commission; and that they commit fraud against vulnerable customers, remains higher than the industry would like. In addition to the identified gender-based cultural norms, women more often live in remote and rural areas, which exacerbates their vulnerability to some of these risks.

### Robust credit risk management needs verification of consumer information

The PAYGo industry is on a journey to strengthen credit risk management and build healthy portfolios that can support growth and long-term impact for consumers, but formalising such processes risks excluding more vulnerable consumer segments. Women are, for example, more likely to lack the assets needed to verify their information or support a PAYGo credit application, such as proof of ID, a registered phone number, or land ownership in their name. As the PAYGo industry develops linkages with Credit Reference Bureaus (CRBs) and mobile money networks to

21 Power for All (2022). *Powering Jobs Census 2022: The Energy Access Workforce*.

22 Energy Sector Management Assistance Program. (2022). *Gender Equality in the Off-Grid Solar Sector*.

23 Mendelson, S. (2022). *Financial Inclusion that Works for Women Lessons and Best Practices from the European Microfinance Award 2022*.

24 FinEquity (2023). *How can we design Consumer Protection That Builds Women's Trust?*

## Looking at OGS models through a gender lens

improve credit-assessment processes, the impact of women's lack of financial inclusion may be more severely felt. More than 750 million women currently do not access formal financial services. As the PAYGo sector innovates in credit information and data sharing therefore, this gap needs to be acknowledged and addressed to ensure that customers without a formal 'footprint' are not unfairly excluded from access to life-changing energy products.

Further, the growing innovations around machine-learning and AI models for credit scoring and repayment management need to very intentionally address the risk of gender bias, since the data sets used are likely to mimic existing-bias and be based on male-dominated information sources (IDs, assets, formal jobs etc.).

### Branch location and opening hours compound time and mobility constraints

Serving rural, remote communities is costly and difficult. Many OGS companies have an expansive network of sales and service centres – but in many cases are still far from customers' homes. To reduce costs of travelling technicians and aided by the growth of 'plug-and-play' products, some companies require customers to travel with their product to the nearest service centre to have technical issues resolved. As described earlier, this can be more difficult for women who face time and mobility constraints, and may not be able to match branch opening times with their availability outside of household duties. Women consumers may therefore be more likely to miss payments due to product/service issues, though this needs more research.

### Protection beyond consumers: Creating safe working environments for women agents

Although the focus of this briefing note is on the protection of women consumers, it's worth bringing attention to the role companies should also assume in ensuring that women sales agents can work in a safe and secure environment, set up for success.

Sales agents often have similar profiles to the target OGS customer – and the cultural norms, social and economic factors that affect risks for women consumers, also impact women agents\*. Women agents may suffer from difficulty travelling alone or after dark, a lack of access to efficient modes of transport such as motorbikes, discrimination when working technically with OGS products (e.g., one agent GOGLA spoke to in Kenya reported being stopped from installing a solar panel on the roof of a customers' house due to superstitions related her gender), conflicting domestic duties with work responsibilities, and imbalance of power when engaging local leaders or potential make customers. Nonetheless, women are also better at reaching and engaging with female customers, and better understand gender-specific benefits of energy products (Power for All, 2019), which can strengthen gender inclusion, impact and growth across a company's portfolio.

When applying a gender lens to consumer protection practices, companies are therefore urged to apply the same lens to their agent networks to review health, safety and security risks – but also ensuring that women agents have the same opportunities as their male peers. Questions to ask include, are agent recruitment practices gender inclusive and designed to attract strong women as candidates? Do women agents have flexibility to adapt their working hours around domestic needs and safer times of day? Can they access and use the same modes of transport as their male colleagues? Are they trained to handle unwelcome or offensive behaviour or harassment from customers or colleagues? Are they given adequate support from the company to allow them to report (e.g., a toll-free agent support phone line) and receive assistance in discriminatory situations?

\* CGAP (2023), [Women Agents for Financial Inclusion, Exploring the Benefits, Constraints and Solutions.](#)



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**Strengthening CP  
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# Strengthening CP and improving portfolios by reducing risks for women

Characteristics that are inherent to women consumers and the PAYGo business model amplify women's exposure to consumer risks. Applying a gender lens to consumer protection helps to identify and build awareness of key risks for women, which can inform operational improvements for OGS companies. This section uses the framework provided by the six CP Principles to better understand the risks and vulnerabilities for women, and then outlines recommended steps that companies can adopt to address them.

## Applying a Gender Lens to the Consumer Protection Code



### Transparency

#### Poor communication hits women consumers harder

Transparent practices ensure that customers can make informed decisions to purchase a product that meets their needs on a PAYGo plan that suits their means and preferences, and that they receive a good experience throughout their customer journey. When companies don't pay enough attention to how they communicate with customers, the risk of end-users misunderstanding key terms, improperly using or maintaining products, and experiencing service challenges increases – all of which can lead to higher levels of default.<sup>25,26</sup>

Since women are more likely to have low literacy (including digital and financial) and less access to information sources and social networks, companies may need to take additional measures to ensure they are adequately engaged, informed and empowered to make purchase decisions. This may include providing a script to agents to talk through PAYGo terms and explain product user information tailored to women's use cases, and providing more support on payment processes when needed. Companies that better understand and leverage women's preferred communication channels will be better able to assist women consumers. For instance, an easy-to-access toll-free hotline may be a good solution for consumers who don't own a smartphone.



### Responsible Sales and Pricing

#### Entrenched human and algorithmic bias may unfairly reject quality women consumers from PAYGo

Reducing the risk of over-indebtedness for consumers is a crucial goal for any well performing OGS company, and tools such as well-designed agent incentives, robust credit risk management processes, and two stage verification with consumers are all useful components of a companies 'responsible sales and pricing' toolbox. Companies should take appropriate measures to ensure customers can afford to pay for the product they've selected – but take measures to understand how women's income may differ from men's and provide well-matched pricing/payment plans as required, and assess repayment patterns with gender-disaggregation of data.

When designing ability-to-pay assessment processes, companies should ensure two things: 1) that the risk of bias (unconscious or algorithmic) is identified and reduced through training for staff, multi-layered assessment or technical controls; and 2) that company processes don't unduly discriminate against consumers (e.g., women) who may lack formal ID, financial footprints or other forms of verification. In these cases, use of guarantors or other such checks can be employed.

25 Chalwe-Mulenga, Duflos and Coetzee (2022). *The Evolution of the Nature and Scale of DFS Consumer Risks A Review of Evidence*.

26 Izaguirre, Kaffenberger and Mazer (2018). *It's Time to Slow Digital Credit's Growth in East Africa*.

# Strengthening CP and improving portfolios by reducing risks for women



## Good Consumer Service

**Women have more difficulty accessing or using redress mechanisms for product/service issues**

The customer experience throughout the lifespan of an OGS product affects repayment rates and sales through referrals – a happy customer is often the best sales-agent! Insights from the financial inclusion sector show that women often face more difficulty accessing adequate redress mechanisms for any issue they experience, and data from work undertaken by GOGLA and 60 Decibels in 2020 also shows that women are more likely to have a product or service issue that remains unresolved. There are a number of reasons why this may occur, such as customer-service desks working hours being mismatched with consumer availability, or, as OGS companies innovate with digitalisation, machine learning and self-service tech – women who do not have access to a mobile phone and are less digitally literate, might struggle to access such services.

Throughout GOGLA's initiative to apply a gender lens to the CP Code, we spoke to a number of OGS companies to gather insights into some of the key issues and practices. What stood out was that very few companies are collecting and using sex-disaggregated data, which if utilised, could provide companies with intelligence needed to understand consumer service issues faced by women customers, identify potential bias in service from male agents, and develop improved services that meet the needs and preferences of their women customers.



## Good Product Quality

**All customers should have easy access to product information, installation and warranty services**

Well-protected consumers benefit from quality certified products that come with a clear user manual, appropriate and user-friendly payment interface and installation services if necessary. Social norms may result in women being excluded from 'technical' instructions given by an agent, or being deterred from seeking qualified technical support if needed – including warranty claims. One company we spoke to also indicated that in some cases women were put off from attempting installation/set-up of plug and play products due to the belief that they were not qualified to deal with something electronic/technical.

Identifying such barriers is the first step for companies, before taking targeted actions to support women (and others such as those with disabilities, for example) with product installations, technical support and warranty claims.



## Personal Data Privacy

**Lower education and literacy levels may lead to riskier data behaviours**

Data privacy and protection risks are growing, and OGS consumers are not exempt from incidences of fraud, breaches or misuse of data.<sup>27</sup> Women with typically lower levels of digital literacy are more vulnerable to the risks of poor data privacy, giving uninformed consent, and engaging in risky behaviour such as sharing passwords/PINs with agents and friends.

## In practice: Improving women's access and use of plug-and-play pumps in Tanzania

With the support of [USAID's Power Africa programme](#), Simusolar developed a gender action plan in 2021, and applied a gender lens to their solar water pump distribution operations in Tanzania and Uganda. They noticed that women consumers were self-excluding from the lease-to-own system on offer due to the perception they were not eligible or bankable, due to lack of land title or other cultural preconceptions.

Having recognised that this might be a potential barrier to potential women customers, Simusolar differentiated the offer as a 'payment plan' and added additional language to sales and marketing materials to clearly communicate the accessibility and inclusivity of the offer.

<sup>27</sup> GOGLA (2022). [Building trust with off-grid solar consumers through better data practices](#) Consumer Protection Briefing Note: Personal Data Privacy.

# Strengthening CP and improving portfolios by reducing risks for women

While OGS companies can ensure that they have robust internal data systems in place to minimise and secure consumer data, they can also take small actions to help make women and vulnerable consumers aware of the risks and how they can protect themselves (such as not sharing mobile money PINs with untrusted parties, even if they are seeking help to make a PAYGo payment).



## **Fair and Respectful Treatment** **Entrenched cultural norms put women at greater risk of harassment and unwanted behaviours**

The principle of fair and respectful treatment ensures that consumers are safeguarded from abusive treatment, discrimination and exclusionary practices, and encourages companies to seek feedback from consumers on the design and delivery of the product, service and payment plan. Looking across company operations with a gender lens can therefore help companies ensure that women consumers who may be more vulnerable to unfavourable behaviours, are properly safeguarded.

Consumer-facing staff – more so in male-dominated workforces – should be sensitised to gender inclusion and trained to recognise

and report unwanted behaviour, understand and mitigate power imbalance, and overcome unconscious bias to treat all customers equitably – in sales, aftersales, default management and, particularly, repossessions.

## **Safeguarding women consumers: Good practice for companies**

By reviewing the Consumer Protection Code with a gender lens, consulting with companies and reviewing existing research from the financial inclusion sector, we've identified four key risks for women OGS consumers. These are:

1. Greater difficulty in accessing and making informed decisions about products, services and payment plans that meet their needs and preferences;
2. Increased vulnerability to over-indebtedness and later default;
3. Higher risk of falling victim to agent-based fraud;
4. Less confidence in using an OGS product or accessing aftersales / issue resolution services.

The recommended good practices summarised below aim to address these four key risks and are informed by insights from the financial inclusion sector, as well as from OGS companies that have already taken action to mainstream gender inclusion across their operations.

### **Gender Sensitisation and training for consumer-facing staff**

The importance of effective training for consumer facing staff on good consumer protection cannot be understated. Training staff and agents to recognise unconscious bias, understand the impact of social and cultural norms, and to identify and report unwanted behaviours, harassment and discrimination is crucial and can be easily incorporated into onboarding for new recruits.

Role specific training is also key to reducing gender-specific risks for women. Agents that are better able to recognise consumers with, for example, lower levels of literacy, digital and/or financial skills, can tailor how they communicate with and support prospective or registered customers. Staff involved in making consumer credit decisions should be trained on gender-based bias and given agnostic scoring tools that can mitigate human and algorithmic bias. [The](#)

### **In practice: Attracting more women customers through targeted marketing**

Easy Solar carried out market research in Liberia and Sierra Leone to delve deeper into the needs and interests of their women customers. They found that women are more likely to be the main customer (named on the contract) if the SHS / appliance is used for business purposes.

Acting upon their findings, the company updated their marketing and sales campaign to target more women for particular products (e.g., business assets such as freezers and cookstoves), showing great success. Currently, around half of customers of these product segments are women, compared to around 20% for other products.

# Strengthening CP and improving portfolios by reducing risks for women

[Women's World Banking field guide to bias in credit processes \(2022\)](#) sheds more light on how companies can train staff and reduce bias.

## **Collect, monitor and act upon sex disaggregated data**

If women customers are indeed more likely to have an unresolved issue than their male counterparts – it's important to first, identify that the problem exists, and second, take action to correct the situation in the short and long term. Without sex disaggregated data on key operational and customer KPIs (Key Performance Indicators) (marketing campaigns, repayment rates, issue types and prevalence etc.) these important insights are being lost and companies lack the insights needed to better target, serve and support women consumers.

Many OGS companies already prioritise customer feedback, and applying a gender-lens to this feedback can add extra benefits for consumers and companies. This can include ensuring representative samples of all genders, and incorporating in-person data collection methods alongside digital/phone-based methods. Once collected, sex-disaggregated data can even inform product design within the R&D stage to not only lead to better user experiences, but also help companies to tap into the needs and preferences of an unmet market segment.

## **Improve the quality of information, services and support**

Companies are encouraged to use tools such as a [Key Facts Statement](#), agent scripts and visual aids, to ensure that important information is clearly and accurately conveyed to consumers. Understanding how women customers (and prospects) access and digest marketing, sales and product information is useful to adequately inform the design of improved communications and support services.

When it is needed (and agents / sales staff should be trained to recognise this), additional support can be offered to consumers during the sales process including ensuring multiple members of the household are included in product demonstration and activation, providing access to trained technicians for installation, and proactive rather than reactive aftersales services that can adapt to the availability of the consumer.

More information on improving transparency can be found in GOGLA's dedicated briefing note: [Empowering consumers through better communication, information and support](#).  
[Consumer Protection Briefing Note: Transparency](#)

## **Design for exceptions (e.g., Non-mobile-money payments, ID verification, secondary contact/customer)**

OGS companies striving to achieve profitability while providing effective services to rural, low-income consumers are rightly optimising operational models through digitalisation and technical innovation. However, companies that build in flexibility or 'design for exception' can mitigate the risk of excluding some of their more vulnerable customers. In practice, this might mean having a secondary payment process established to help customers that can't access mobile money payments and thus helping them avoid being victims of agent/payment fraud; accepting alternative forms of identity verification or the ID of a guarantor; or collecting the details of a secondary contact in the household that can be reached in case the primary customer is unavailable at certain times.

## **Mainstream gender inclusion across the organisation – especially recruitment**

Mainstreaming gender inclusion across company operations can help to fully realise the benefits for businesses and consumers – which are not only limited to consumer protection. In addition, gender inclusion in recruitment has been shown to be effective in reaching the market potential of women consumers, as female sales agents better understand gender-specific benefits of energy products, and are therefore better able to support and target women customers (ESMAP 2022). In places where cultural norms restrict women consumers from freely interacting with male agents for example, female agents and sales representatives may be a critical part of ensuring more women access and benefit from life changing off-grid solar products.

## **Identify and address bias in R&D, tech innovation and digitalisation**

The industry is innovating and rapidly adopting digital and technological developments to improve product quality, services and affordability. But in doing so, we must not unintentionally exclude

## Strengthening CP and improving portfolios by reducing risks for women

the very people we need to reach by accidentally building in bias to automated and algorithmic systems and processes.

AI and machine-learning innovations have the potential to remove human biases that impact women, but without intentional action to recognise and address them, the systems inherit entrenched human bias present in the data sets and processes on which they are built. OGS companies innovating in these areas are encouraged to identify the risks and take proactive steps to mitigate them – including training for R&D/Software teams, and ensuring the gender lens is built in from the very beginning of the R&D lifecycle to make sure consumer protection standards are upheld when products reach market.

### Conclusion

Even though men make up around two thirds of the OGS customer-base, scratch beneath the surface and it's often women who are the primary users and beneficiaries of a solar home system or other OGS product. Mainstreaming gender inclusion across the industry is therefore key to reaching universal energy access and ensuring that the products, payment plans and services the industry offers match the needs, means and preferences of women and reduce the impact of energy poverty on those who feel it most.

Applying a gender lens to CP practices has also highlighted key areas where companies can improve gender inclusion more broadly – such as across product design, user interfaces, payment processes, and systems of redress. By purposefully serving the needs of half of the population, companies can also increase their market share, realise better repayments, impact and growth.

The work that informed this briefing note has also uncovered gaps that the sector should look to fill, including:

- Comprehensive research into consumer protection risks for women customers, particularly on instances of agent fraud and bias in credit assessments, both of which are areas of concern in the financial inclusion sector, and may therefore be equally of concern for OGS customers. Context- and market- specific research and analysis of gender-disaggregated data will help a range of industry stakeholders, from OGS companies to policymakers and regulators, to better understand women's needs, barriers and vulnerabilities, and refine recommended solutions.
- Capacity building to help companies not only collect sex disaggregated data, but to monitor, learn from and act upon it to improve product design and testing, marketing, sales, PAYGo payment plans and customer services.

As part of this gender lens project, GOGLA, with the Consumer Protection Working Group, has reviewed and updated the consumer protection indicators to ensure that they adequately reflect and respond to CP risks particular to women consumers. The complete version 3.0 of the CP Indicators can be accessed [here](#).



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The Voice of the **Off-Grid Solar Energy** Industry