e-commerce and consumer protection

Consumers – real needs in a virtual world

Scottish Consumer Council
Making all consumers matter
About the Scottish Consumer Council

The Scottish Consumer Council (SCC) was set up by government in 1975. Our purpose is to promote the interests of Scottish consumers, with particular regard to those people who experience disadvantage in society. While producers of goods and services are usually well-organised and articulate when protecting their own interests, individual consumers very often are not. The people whose interest we represent are consumers of all kinds: they may be patients, tenants, parents, solicitors’ clients, public transport users, or simply shoppers in a supermarket.

Consumers benefit from efficient and effective services in the public and private sector. Service-providers benefit from discriminating consumers. A balanced partnership between the two is essential and the SCC seeks to develop this partnership by:

- carrying out research into consumer issues and concerns;
- informing key policy and decision-makers about consumer concerns and issues;
- influencing key policy and decision-making processes;
- informing and raising awareness among consumers.

The SCC is part of the National Consumer Council (NCC) and is sponsored by the Department of Trade and Industry. The SCC’s Chairman and Council members are appointed by the Secretary of State for Trade and Industry in consultation with the Secretary of State for Scotland. Future appointments will be in consultation with the First Minister. Martyn Evans, the SCC’s Director, leads the staff team.

Please check our web site at www.scotconsumer.org.uk for news about our publications. We can often make our publications available in braille or large print, on audio tape or computer disk. Please contact us for details.

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The SCC assesses the consumer perspective in any situation by analysing the position of consumers against a set of consumer principles. These are:

ACCESS
Can consumers actually get the goods or services they need or want?

CHOICE
Can consumers affect the way the goods and services are provided through their own choice?

INFORMATION
Do consumers have the information they need, presented in the way they want, to make informed choices?

REDRESS
If something goes wrong, can it be put right?

SAFETY
Are standards as high as they can reasonably be?

FAIRNESS
Are consumers subject to arbitrary discrimination for reasons unconnected with their characteristics as consumers?

REPRESENTATION
If consumers cannot affect what is provided through their own choices, are there other effective means for their views to be represented?
Consumers – real needs in a virtual world

The Scottish Consumer Council wants to see e-commerce work. It's not our business to suggest to people where and how they should shop, but we believe a lively online retail sector could bring many new benefits to consumers. Around-the-clock access to goods and services from home is a convenience undreamt of before the development of the world wide web. Easy access could bring more choice and convenience to people previously isolated by geography or mobility problems, or even their own unawareness. The worldwide platform could open up unprecedented levels of choice for consumers and cater efficiently to previously uneconomic specialist consumer needs.

Despite the enthusiasm and publicity surrounding dotcom enterprises, and the government's encouragement for online businesses, shopping is one of the least popular online activities. Whilst almost a quarter of the Scottish population now have Internet access at home or at work, only 2% say that they are regular e-shoppers.

Many surveys have looked at consumer attitudes to e-commerce but no one has asked consumers how much protection they feel they have if something goes wrong with an online transaction. In April and May 2000 we conducted extensive research into their views about consumer protection online through a survey of Scottish consumers. Our research provides a new insight into what's in the way of online shopping taking off, highlighting in particular the problems associated with restricted Internet access for certain groups of people.

The overwhelming impression we received is that consumers sense there is a lack of respect for their rights and their safety online. These views are remarkably consistent throughout Scotland, England and Wales. Consumers are asked to pay for goods before they have seen them, and to hand over personal and financial details up front in an environment that they hear all the time harbours shady characters. They're afraid for their financial safety, from hackers and fraudsters. They're worried about their personal privacy. What's more, Internet users are even more concerned than other people are. And high numbers have no idea what sort of consumer protection they have - online or offline - or by whom they are protected. These are not irrational fears. With mail order, which has never been particularly attractive to most UK consumers, shoppers often get a chance to see the goods before they pay for them. Visa recently surveyed fifteen banks from twelve EU countries: it found that credit card payments account for nearly half of all complaints, more than one in five of which came from people billed for online transactions who had not even shopped on the Internet. That kind of evidence shows security fears are real and must be taken seriously. And as for consumer protection, our own Office of Fair Trading's advice says, “In most cases your shopping experience should be no more risky than buying by mail order or on the phone. But you need to be aware of possible dangers and should take certain precautions to make shopping across the Internet safe. This is an area where consumer protection is developing.” It is scarcely surprising that many consumers are opting to wait until consumer protection has developed before venturing online.

If the e-economy is to work, government and business need to acknowledge and address the reality of consumer scepticism. E-commerce has the potential to offer many advantages for consumers, but it could also expose them to unacceptable levels of risk unless adequate measures for consumer protection and redress are put in place - whether people are shopping in the UK, within the EU or across international borders. Our report highlights some important policy issues that need to be followed up in more detail.
Internet Access

A wealth of material is available about the growing numbers of people using Internet technology at work and at home. Data has been collected not only on Internet access but a further range of technologies including PCs, telephones and mobile phones. This section provides an introduction to the more specific findings of our research by reviewing the access that the Scottish and British population has to relevant technology enabling them to shop online.

The table below provides some baseline information for the findings of the research and illustrates the regional differences in Internet access, digital TV usage and e-shopping throughout Britain.

From the above data it appears that there is a north/south divide in terms of the uptake of the Internet and digital TV. In Scotland and North England, just under a quarter of respondents have access to the Internet. This is compared to over a third in London and the South. Despite this difference the proportions describing themselves as ‘regular’ e-shoppers are very similar. Only 2% of the Scottish public use e-commerce regularly (7% do so occasionally) which is around the same proportion as in the rest of the country.

However, this aggregate data hides further divides within the research regions, divides that have been highlighted by other research in this area and are likely to affect the opinions stated by respondents. For example, recent work carried out by the Social Exclusion Unit Policy Action Team 15 highlights the lack of access to Information and Communication Technology (ICT) in deprived neighbourhoods. A report commissioned by PAT 151 notes that 11.8 million people, 24% of the total population, live in the most deprived local authority districts in England. These districts had 111,006 Internet users, a figure representing only 19.6% of all Internet users (in England) found in this study and not 24% as would be proportionally correct. This confirms that access to the Internet in these areas is below the national average. In a related manner, the actual PAT 15 report shows that by looking at the characteristics of those in social class DE some insight into the problems faced by certain groups in gaining access to appropriate and adequate technology can be achieved. A selection of indicators found were:

<table>
<thead>
<tr>
<th>Region</th>
<th>Internet Access</th>
<th>Digital TV</th>
<th>Regular e-shoppers</th>
</tr>
</thead>
<tbody>
<tr>
<td>South England (excl London)</td>
<td>35</td>
<td>17</td>
<td>4</td>
</tr>
<tr>
<td>London</td>
<td>34</td>
<td>23</td>
<td>5</td>
</tr>
<tr>
<td>Midlands</td>
<td>31</td>
<td>16</td>
<td>2</td>
</tr>
<tr>
<td>Wales</td>
<td>31</td>
<td>19</td>
<td>3</td>
</tr>
<tr>
<td>England</td>
<td>30</td>
<td>17</td>
<td>3</td>
</tr>
<tr>
<td>Scotland</td>
<td>23</td>
<td>22</td>
<td>2</td>
</tr>
<tr>
<td>North England</td>
<td>23</td>
<td>13</td>
<td>2</td>
</tr>
</tbody>
</table>

• Those in class DE are less likely ever to have used a PC or the Internet than the population as a whole - 38% and 14% compared with 58% and 29%;
• Only a quarter of DEs say they have access to a PC at home compared with 44% of all adults;
• Only 2% of DEs say they have Internet access in the home compared with three ABs and 14% of all adults;
• Only 9% of DEs used the Internet in the last twelve months compared with 43% of ABs.

The SCC research demonstrated similar results. It has already been shown above that a smaller proportion of the Scottish public have Internet access, this may be explained in part by a smaller number of the same population owning or having access to a personal computer than in Britain as a whole (36% compared to 44%). Interestingly, the figures for digital TV ownership are completely opposite although the difference is less marked (22% Scotland vs 19% Britain). Over half of those who have a PC or laptop at home in Scotland are in the AB social class category whereas only one in five DEs are in the same position. In terms of Internet access, the picture is very similar (Fig.1).

From the chart above it can be seen that the proportion of the public with Internet access decreases as we move down the social scale. Thus, whilst 37% of ABs have Internet access, the same can be said for only 8% of those in the DE class, a figure well below the national Scottish average of 19%.

Internet use is also clearly divided along other demographic lines. In terms of gender, males make consistently more use of the Internet at home (16% vs 13%), at their work or place of study (16% vs 12%) and elsewhere (6% vs 4%). The Internet is also used at home more commonly by those in the 15–34 year old age group, than by those in the 35–54 and 55+ bands. The Scottish indicators are mirrored generally in the British results where 60% of all Internet users are male and half (50%) are within the youngest age range although a significant minority (40%) are between 35–54 years old.

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Access to the Internet at home is further distinguished by housing tenure. A staggering 93% of those with Internet access at home either own their home outright or are buying it with the help of a mortgage. According to the most recent Scottish Household Survey results published this year, 61% of Scottish households fall into this category with 23% of the population owning their property outright and 38% purchasing it with a loan or mortgage. Only 4% of those with Internet access at home reside in private rented homes and an even smaller proportion of just 2% live in rented council accommodation.

The table at the head of the report demonstrated that whilst around a quarter (23%) of the Scottish public and almost a third of the English public have Internet access only a very small proportion of each actually shop online regularly (2% and 3% respectively). The proportions of those who shop online occasionally are higher but still very small. In Scotland, 7% of consumers admit to shopping occasionally on the Internet, which is slightly lower than the 9% of British consumers who do so.

The characteristics of those who have adequate access to e-commerce are similarly reflected in the characteristics of those who shop most often. Thus, whilst 14% of those in social class AB in Scotland occasionally use the Internet to shop, only 2% of DEs do so. For Great Britain the margin is slightly higher; 17% of ABs occasionally shop online against 2% of DEs. Online shoppers are also split on gender terms, in Scotland slightly more males (9%) than females (5%) occasionally use the Internet to shop. Similar results were found for the whole of Britain where around one in ten males (11%) shop online occasionally compared to only 7% of females. Interestingly, age difference makes very little impact in this instance with the proportion of 15-34 year olds and 35-54 year olds who occasionally shop online being very similar at 8% and 9% respectively.

It is evident that the UK government has already acknowledged the situation reflected in the above results with the establishment of PAT 15 whose specific remit is to tackle lack of access to ICT suffered by particular groups of people. However, these statistics also have significant implications for the Scottish Executive in their commitment to promoting ‘social justice’ throughout Scotland. In the recent report Social Justice: A Scotland Where Everyone Matters, the government committed itself to a belief that “every community and individual in Scotland should have high quality access to digital technology and information no matter where they live or what their circumstances.” It is evident that the situation in Scotland is far from this ideal and that many restrictions are yet to be overcome in this area.
Consumer Protection

A number of issues clearly affect the level of protection that consumers feel they have online. Fear of fraud is salient and there are also concerns associated with paying for goods in advance. Consumers are highly confused about where they should go if they have a problem with an online transaction. This confusion is justified, given that little attention has been given to providing consumers with either the support or the readily accessible complaint schemes they need to be able to gain effective redress, particularly across borders. Consumers want the same protection online as offline, with clear information about how this applies to transactions with non-UK sites.

Security

The vast majority of the Scottish public feel safest shopping on the high street – 87% of Scottish consumers say it is the safest way to shop and more than a third (36%) believe the Internet to be the riskiest. In each case, the Scottish proportion represents no significant difference from British results.

The main reason consumers give when asked why they think shopping on the Internet is the riskiest is having to release credit card details, which is mentioned by over half of respondents (52%). In addition, 14% are worried about fraudulent suppliers and 9% say risk stems from being unable to check goods beforehand, with the same proportion also mentioning unknown suppliers and the risk that goods may not turn up. Concerns over releasing credit card details are less for Britain as a whole where 46% cited this as the main reason but a larger proportion (57%) say that releasing credit card details is the main reason for such risk.

Opportunity to inspect goods

Having to release credit card details is also mentioned as a key disadvantage of shopping online with 43% of respondents saying it is the main disadvantage (Fig.3). However, Scottish consumers are slightly more concerned with the fact that they cannot touch the goods previous to purchase with 46% stating this as the main disadvantage. The same trend is evident for the British sample although in each case the proportions are slightly higher for the Scottish public than the British public. Thus only 41% of the latter saw the main disadvantage in not being able to touch the goods and 39% placed it with releasing credit card details.

Among Internet users this situation is reversed. The dangers associated with credit cards take the primary disadvantage spot with 59% regarding this as the main disadvantage and just over half (51%) considering not being able to handle goods as the biggest problem.
When asked what would encourage them to buy more from the Internet (Fig. 4), 23% of Scottish respondents said they would buy a brand they recognised. The same proportion said they would buy if they could be sure that the site was secure. Overall, each set of results is very similar. However, it appears that whilst Scottish consumers value a recognised brand as much as a secure site, the British public are slightly more concerned with security overall. 26% said that they would be encouraged to buy/buy more from the Internet if they could be sure the site was secure and 23% said they would if it was a brand they recognised.

Each of these main reasons assumes a more important status among Internet users. The results demonstrate that in each case the proportion is higher and that security by far overrides all other concerns with 43% mentioning it as a main reason for buying or buying more online. A higher proportion than non-users of around a third (31%) also mentioned a recognised brand name.

**Fostering trust online**

The key incentives of improved security and using known brands or suppliers are not the only means through which trust is engendered online. For Scottish Internet users in particular, a trustworthy shopping experience is also assured by using a site that has a High Street presence, mentioned by 28%, and by using a company with whom they have had previous dealings. Access to information about consumer rights and redress also feature prominently amongst Scottish users, slightly more so than for Britain as a whole. Using a site where it was clear on-screen what to do if problems arise was mentioned by 25% (vs 22%); if they knew they had the same rights as in a shop by 24% (vs 21%); and if there was an organisation to go to with problems by 21% (vs 21%).

A reliance on the tried and trusted also realises itself in a reluctance of consumers to buy from unknown foreign organisations as they do not know which companies they can rely on to deliver high standards of service (Fig. 5). Interestingly, whilst Scottish Internet users are less reluctant to buy from abroad (11% say they would never buy abroad compared to 19% across Britain), they are more concerned about buying from a recognised company and buying from the USA, yet less concerned about the protection offered by a credit card purchase.
Clear redress mechanisms
Consumers are discouraged from shopping on the Internet by the concern that if something goes wrong it will be tremendously difficult, if not impossible, to rectify it. Scottish consumers are just as confused as the wider British public and are equally as unaware of the legal protection that they have. A significant proportion of Scottish respondents (38%) believe they have less legal protection when shopping on the Internet than when shopping in other ways, a figure slightly higher than that for the wider sample (33%). Only a quarter know the true scenario, that they have the same protection online as they do offline, though it may be more difficult to obtain redress in the former and a third (33%) do not know either way.

When asked where they would go to sort out a problem with a High Street transaction if the company would not help, most Scottish consumers, like those elsewhere, chose trading standards (49%), a citizens’ advice bureau (34%) or the Consumers’ Association (23%). Only 3% say they would not know where to go. However, when presented with the same options for a problem with a purchase on the Internet the “don’t know” proportion increases to 21%.

Around a quarter of Internet users (26%) would approach their credit card company to deal with the problem, an option taking more precedence than the Consumers’ Association in this case. However, a significant number of Scottish consumers – even those with credit cards – do not understand the difference in consumer protection offered by credit cards and debit cards (Fig. 6). It appears in this case that the Scottish consumer is less well informed than the British public as a whole. Whilst in both cases the same proportion of respondents agree that credit cards offer higher levels of protection (31%), a larger section of the Scottish public believe incorrectly that there are higher levels of protection with a debit card (7% vs 14%).

Conclusion
It is clear from the above analysis that with regard to e-commerce and consumer protection the attitudes and opinions of the Scottish public do not differ in any significant manner from those of the wider British public. Whilst in several cases percentage totals are different, consideration of sampling tolerances, discussed below, does not allow for any significantly different conclusions to be drawn for Scottish consumers.

Figure 5
Which of the following is the closest to your view in terms of buying from sites outside the UK on the internet or digital TV?

<table>
<thead>
<tr>
<th>Scotland</th>
<th>Britain</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Would never buy from abroad</td>
<td>45% 44%</td>
</tr>
<tr>
<td>2 Would buy abroad if knew company</td>
<td>16% 15%</td>
</tr>
<tr>
<td>3 Would buy abroad only from US</td>
<td>6% 7%</td>
</tr>
<tr>
<td>4 Would buy abroad only with credit card</td>
<td>9% 8%</td>
</tr>
<tr>
<td>5 None of these</td>
<td>9% 10%</td>
</tr>
<tr>
<td>6 Don’t know</td>
<td>15% 16%</td>
</tr>
</tbody>
</table>

Figure 6
Thinking about playing with plastic, how strongly do you agree or disagree with the following statements?

<table>
<thead>
<tr>
<th>Scotland</th>
<th>Britain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Base: Whole sample</td>
<td>Base: Credit card holders</td>
</tr>
<tr>
<td>1 Higher level of protection with credit card</td>
<td>31% 32%</td>
</tr>
<tr>
<td>2 Higher level of protection with debit card</td>
<td>27% 28%</td>
</tr>
<tr>
<td>3 Same protection on each</td>
<td>31% 32%</td>
</tr>
<tr>
<td>4 Don’t know</td>
<td>14% 15%</td>
</tr>
</tbody>
</table>
The sample tolerances that apply to the percentage results in this report are given below (Fig. 7). This table shows the possible variation that might be anticipated because a sample, rather than the entire population, was interviewed. As indicated, sampling tolerances vary with the size of the sample and the size of the percentage results.

For example, on a question where 50% of the people in a weighted sample of 520 respond with a particular answer, the chances are 95 in 100 that this result would not vary more than 4 percentage points, plus or minus, from a complete coverage of the entire population.

Tolerances are also involved in the comparison of results from different parts of the sample. In other words, a difference must be of at least a certain size to be considered statistically significant. The following table (Fig. 8) is a guide to the sampling tolerances applicable to comparisons.

Given such statistical tolerances it can be concluded that the concerns of Scottish consumers over consumer protection in the electronic environment are almost identical to British consumers. However, statistics produced surrounding variations in access to the Internet for different consumers within Scotland, particularly with respect to differences between social class and housing tenure, remain importantly significant.

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**Figure 7**

Approximate sampling tolerances applicable to percentage levels at or near these levels

<table>
<thead>
<tr>
<th>Size of sample on which survey result is based</th>
<th>10% or 90%</th>
<th>30% or 70%</th>
<th>50%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scotland</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>All interviewed (520)</td>
<td>3</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Credit card holders (290)</td>
<td>4</td>
<td>5</td>
<td>6</td>
</tr>
<tr>
<td>Great Britain</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>All interviewed (1950)</td>
<td>1</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Credit card holders (915)</td>
<td>2</td>
<td>3</td>
<td>3</td>
</tr>
</tbody>
</table>

**Figure 8**

Differences required for significance at or near these percentages

<table>
<thead>
<tr>
<th>Size of samples on which survey result is based</th>
<th>10% or 90%</th>
<th>30% or 70%</th>
<th>50%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scotland</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Men (230) vs women (290)</td>
<td>5</td>
<td>8</td>
<td>9</td>
</tr>
<tr>
<td>15-34 (170) vs 55+ yr olds (173)</td>
<td>6</td>
<td>10</td>
<td>11</td>
</tr>
<tr>
<td>Full-time (182) vs part-time (53)</td>
<td>9</td>
<td>14</td>
<td>15</td>
</tr>
</tbody>
</table>
Policy Issues

The similarities between Scottish and British consumers in this field allow us at the Scottish Consumer Council, for the purposes of this report, to highlight the same policy issues and make the same policy recommendations as those highlighted and made in the National Consumer Council report E-commerce and consumer protection: Consumers - real needs in a virtual world.

Security
Whatever the advantages and attractions of online shopping, security was a pertinent issue within the survey. In the absence of reliable and verifiable information about the level of risk in online transactions consumers make assumptions about safety and security based on the evidence available to them. Their own experiences, the experiences of friends and family, and press and media reports suggest there is reason to be concerned.

Some of these doubts may be reduced over time, as online transactions become more familiar, but while there are plenty of apparently safer alternatives some consumers will not venture online.

However, there are evidently some gaps in security justifying consumers’ lack of confidence in online security systems. Irrespective of whether breaches arise from the technology or the human element in the chain, this issue needs to be addressed. Openness and transparency about fraud and security would help consumers to understand how they are protected. But it is clear that hardware and software systems, as well as payment mechanisms like credit cards, need to be more secure.

In the absence of reliable and verifiable information, and a means of checking the validity of online security devices, consumers will continue to see online shopping as risky. For many the uncertainty will remain a deterrent.

Opportunity to inspect goods
The government is obliged to implement the European Distance Selling Directive, which will give consumers a right to an inspection period, and the right to withdraw from an online transaction within seven days, but only for goods bought within the European Union. Online retailers will be required to inform their customers of this right.

We will need to monitor how effectively these measures bolster consumer confidence and to see if they address consumers’ anxieties about having to pay for goods before seeing them. Online standards need to be brought into line with consumers’ expectations, with examples of good practice leading the way. It is up to online channels to ensure that information about goods and services is accurate and to provide easy ways of returning goods that turn out to be unsatisfactory.

Fostering trust online
In many ways consumers’ expectations of the ease, speed and convenience of e-commerce are not being met, undermining confidence and causing disappointment. If e-traders and e-retailers are to deliver the promise of e-commerce they have to develop high standards across the board, including customer service, delivery, returns and information.
Our findings show that consumers want to know where they stand, and exactly what to expect if they use online channels. They want some kind of highly visible body to oversee online transactions, to be responsible for setting and monitoring standards for different kinds of online businesses - one that is well publicised and easy to recognise. Certification that a business complies with a set of co-regulatory guidelines, or a code of practice, is one way of trying to protect consumers from unacceptable business practices.

And consumers recognise that self-regulation or co-regulation is likely to prevail because the support and cooperation of industry and providers will be essential. A self-regulatory framework is also more flexible and more easily adapted than legislation, but needs to ensure that standards match consumer expectations, that those standards are maintained, and that they are enforced.

The evidence of views expressed in discussion groups, organised for the NCC research and conducted in various English districts, shows that any self-regulatory body needs to have some independence from retailers and other providers. The people in our groups were sceptical about trade associations, preferring to have access to a body that could, at the very least, act as a clearing house for complaints and redress by telling people to whom they needed to complain, and how. The big question for consumers, however, is how any decisions about redress would be enforced.

**Clear redress mechanisms**

A practical means of redress - for credit card holders - is the agreement operated by credit card companies under section 75 of the Consumer Credit Act. But it is time to bring it into line with what is happening on the ground: the £100 lower limit should be removed, and the legislation should be amended to make it clear that all transactions from the UK are protected. At the moment there are different interpretations of the Act among regulators and card companies. The review of the consumer credit directive may also provide an opportunity to explore the possibility of extending the kind of protection afforded by the UK legislation to all consumers within the European Union.
However, consumers should not have to rely on their credit card company to get redress. In any case around half the adult population of Britain and Scotland does not have a credit card, and cannot take advantage of the added protection. Consumers need access to cheaper payment mechanisms – credit cards can cost consumers dearly – with improved security and payment protection.

Given the ‘hassle’ associated with making a complaint – which many consumers feel is a deliberate tactic to ‘wear them down’ and get rid of them, consumers would prefer to have access to a co-ordinating body, at arm’s length from retailers and traders to provide information about standards and complaints. For example, by showing consumers when web sites and traders are members of a code of practice, as well as which ones are not members, and where and how to pursue a complaint.

Electronic commerce is global and national schemes cannot provide redress across borders. However, once national schemes are in place there will be opportunities to develop bi-lateral and multi-lateral agreements with schemes in other countries. Initiatives will have to be co-ordinated at global level with international organisations, such as the OECD and the World Trade Organisation. Then traders could link directly from their web sites to the most appropriate scheme, or regulatory enforcement body. These initiatives should be backed up by co-operation to enable consumers to obtain redress through a body in their own country.

A grave concern is that most consumers don’t know what legal protection they have or how it is enforced. They need reliable information about their online rights, and about the kind of risks involved in e-commerce. The government can contribute by leading an awareness-raising publicity campaign. Otherwise doubts will remain, trust in e-commerce will be slow to develop, and the gap between public policy and private actions will deepen.