Price Comparison Websites

Trust, choice and consumer empowerment in online markets
Introduction

Consumer empowerment is central to current Government strategy. The Department for Business, Innovation and Skills’ (BIS) Consumer Empowerment Strategy is set out in Better deals, Better Choice: consumers powering growth. BIS will publish a report on progress in December.

The strategy also identified the role of new technologies in opening up new channels for consumers to find, compare and purchase goods and services, and the ability of businesses to use data transmitted through this technology to understand their customers better and direct their products and services accordingly. Price comparison websites (PCWs) feature prominently in this vision.

In line with BIS’ Strategy and its emphasis on new technologies, the OFT’s 2012-13 Annual Plan commits to improving trust in online markets.
A Key Choice Tool
PCWs are a key choice tool for consumers. When they work well, they enable consumers to compare products across the market, reduce the amount of time searching and comparing, and ultimately get better deals. PCWs are also often seen by suppliers as a cost-effective way to reach large numbers of consumers and the price transparency enabled by PCWs can increase competition among suppliers and reduce prices. A survey commissioned by the European Commission found that PCWs provide savings of an average of 7.8 per cent on the online retail price across Europe.¹

Usage is held back
It follows that there is clearly a benefit in ensuring that as many consumers as possible understand what PCWs can offer and feel confident enough to take advantage of them. However, the evidence shows that usage of PCWs is held back by a lack of understanding, trust and confidence in some sectors of society. Of those people who do not use PCWs as part of their search, 13 per cent say that they do not believe the websites are independent and impartial and eight per cent say they are too complicated, difficult or confusing to use.²

We estimate that if consumers used PCWs as effectively as they could they would stand to save significant amounts. A 2007 report by the OFT estimated the potential savings at £150-240m per annum.³

¹ Consumer market study on the functioning of e-commerce and Internet marketing and selling techniques in the retail of goods, Civic Consulting Survey, Final Report: Part 1, commissioned by Executive Agency for Health and Consumers, 2011
² Advertising of Prices, December 2010, OFT 1291, see www.oft.gov.uk/OFTwork/markets-work/advertising-prices/#named4
³ Internet shopping – an OFT market study, June 2007, OFT 921, see www.oft.gov.uk/OFTwork/markets-work/internet

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Under-use of PCWs

Under-use of PCWs is troubling today but has the potential to become a more serious matter in the future. The Government’s midata programme (see midata box for details), will encourage companies to release data back to customers in a portable electronic format so they can use this data for their own purposes. However, the more detailed the information that consumers have at their disposal, and that they can share with others, the more important it becomes that they use a powerful and trustworthy ‘choice engine’ to reach their decisions. PCWs are some of the most established choice engines in the UK and are likely to continue to feature prominently in the future.

midata

The midata project is an initiative run by BIS in conjunction with business and consumer groups aimed at giving individuals more access to, and control over, the data that companies hold on them.

People will be able to view, access and use their personal and transaction data in a way that is portable and safe. This will enable them to view their own spending habits, improve their buying decisions, and take advantage of technology which can use their data to find them a better deal or inform them about their spending habits – helping them to manage their finances.

Examples of information that consumers will be able to access include how much energy they use each day, how much they could save on their weekly shopping, and if they are on the best mobile tariff.

Midata will promote competition by driving improvements in consumer value and choice, and reduce problems with information, searching, and switching costs.
The OFT’s role and previous work

The OFT’s role

The OFT has a cross-sectoral role in relation to PCWs. Many sectors of the economy, such as telecommunications, energy or financial services, have specialised sector regulators, such as Ofcom, Ofgem or the Financial Services Authority (FSA). Many of these sector regulators have already undertaken work in relation to PCWs. For example, Ofcom operates an accreditation scheme and the FSA has issued guidance that applies to PCW operators.

In this environment, the OFT’s role is to consider cross-sector issues where there may be opportunities for joint working with our regulatory partners and to monitor the performance of PCWs in relation to those sectors of the economy that are not covered by a sector regulator.
A wide range of OFT work

In accordance with that role, the OFT has carried out a range work in relation to online markets and PCWs over the last few years, including:

- **The closure of 19 unlicensed lead generation websites**, which sourced information from people looking for credit and sold their data on to other businesses (April 2011).

- **Enforcement action** against the largest UK supplier of heating oil and certain PCWs to prevent consumers from being misled when searching online for heating oil supplies (September 2011).

- **Consultation jointly with the Civil Aviation Authority** (CAA) on guidance for travel agents and tour operators, including PCWs, as to their obligations under relevant consumer legislation. In particular, it seeks to ensure that businesses present all information in a clear and timely manner to consumers (November 2012).

- **A report exploring the competition implications arising from price relationship agreements** such as ‘price match’ or ‘lowest price’ guarantees. This included work on Most Favoured Nation clauses which were identified as a key feature of the PCW sector in relation to motor insurance (September 2012).

- Exploration (in conjunction with Cabinet Office) of the importance of choice to consumers and how choice tools support markets in the public and private sectors to function more effectively. This included **a joint event bringing together leading choice tool providers** from private and public markets alongside other stakeholders to explore how government can best support the development and use of such tools (April 2011).

- **Regular web sweeps of online retailers to assess levels of compliance with the Distance Selling Regulations and other consumer protection law.** The **most recent web sweep** (October 2012) found overall improvements in compliance by the top online retailers although some sites still caused

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4 A clause in a contract that contractually obliges a manufacturer to offer a retailer the best price it offers to any other retailer
concern due to restrictions on customers' rights to a refund, lack of email contact details, and unexpected charges at checkout.

- **OFT’s strategy for protecting consumers shopping online** from misleading selling, deceptive online advertising and malicious practices (December 2010).

- **The Advertising of Prices market study**, which explored the effect of certain pricing techniques on consumers’ purchasing decisions (December 2010). The study included an assessment of consumers’ experience of using PCWs, such as the extent to which they understood that search results may reflect assumptions and may not compare like-for-like products and services, and the degree to which they assumed prices and stock levels were reliable.

- A report into **Attitudes to Online markets**, a survey based study that examined both attitudes and an understanding of consumer rights amongst different demographic groups (August 2010).

- A study of **online behavioural advertising**, whereby the adverts served are individually tailored using information collected about a consumer’s internet use and also examining the possibility of customised pricing (May 2010).

- A **Call for Information** to explore the extent to which businesses are monitoring online shoppers and using the data to target them with personalised prices (November 2012).

Alongside its regulatory and consumer body partners, the OFT has a key role in helping to make the PCWs work well for consumers.
Regulation of PCWs – Our partners

Some important sectors where PCWs feature as a choice tool do not have a specific industry regulator and fall within the OFT and Trading Standards Services general enforcement functions. Retail (shopping) and home repairs are two such examples.

Wider interest in price comparison websites

However, several other regulators, organisations and industry groups also have an interest in PCWs in key sectors, often with specific regulation or guidance. Figure 1 illustrates each organisation’s remit or interest in relation to the key PCW issues that this paper discusses.
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<th>Category</th>
<th>Financial</th>
<th>Energy</th>
<th>Air Travel</th>
<th>Legal Services</th>
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Figure 1 – Our partners and their remits

The regulators and consumer bodies detailed above are the Advertising Standards Authority (ASA), Civil Aviation Authority (CAA), Consumer Focus (CF), Financial Services Authority (FSA), Legal Services Consumers Panel (LSCP), Office of Communications (Ofcom), Office of Gas and Electricity Markets (Ofgem), Office of the Rail Regulator (ORR), Trading Standards Services (TS). The LSCP and CF are both consumer bodies, while the other organisations are regulators.
Work by our partners

This work is intended to support the variety of work already undertaken by our partners in relation to PCWs. Among other things, that work includes:

- Establishing an accreditation scheme for PCWs for telecommunications products (Ofcom, December 2006).

- Review into general insurance comparison websites (FSA, May 2008).

- Examples of Good and Poor Practice in general insurance comparison websites (FSA, November 2008).

- Review into insurance comparison websites (FSA, November 2008).

- Establishing a Confidence Code for energy product PCWs (Consumer Focus, December 2010). Responsibility for the Code will transfer to Ofgem in 2013.

- Issuing guidance on the selling of general insurance policies through PCWs (FSA, October 2011).

- An adjudication in relation to statements regarding the reliability of customer reviews on a PCW (ASA, February 2012).

- Publication of a report on PCWs operating in the legal services sector that included 20 draft standards (LSCP, February 2012). This report has been endorsed by the Legal Services Board.

- A consultation on joint CAA and OFT guidance to travel agents and tour operators (November 2012).

- A mystery shopping exercise into 100 PCWs (Consumer Focus, forthcoming).

Given that the regulatory framework for PCWs spans several regulators and sectors, the OFT has an important role in ensuring coordination across the board and maximising regulatory effectiveness. The following sections of this report outline the OFT’s recent work, alongside our partners, to promote greater transparency and trust in the PCW sector.
Review of standards: trust, choice and consumer empowerment

This work complements and is in addition to the various projects the OFT has already undertaken in relation to PCWs and online markets in general (see the section on OFT’s role and previous work for details of these projects).

To avoid duplication of effort with other work of the OFT, and other regulators, this latest OFT project did not examine a variety of important issues that have already been addressed or would be better addressed in other work by sector regulators, such as accuracy of pricing. Instead, this project focuses on some of the key cross-sectoral issues that may reduce consumer trust in PCWs.

Understanding the issues

We wanted to understand some of the issues that might be undermining consumer confidence and to consider ways in which trust and transparency could be improved.

As already discussed, many regulators and consumer bodies, as well as the OFT, have already undertaken work in relation to PCWs. To avoid duplication of this work the OFT focussed on cross-sectoral issues.

We conducted a web sweep of 55 PCWs across several sectors to gain an insight into a number of issues that could promote or undermine consumer trust.

The results of that web sweep were discussed at a roundtable with our regulatory and consumer body partners. The key cross-sector issues identified at that roundtable were data privacy, transparency of information, and exclusion of liability and complaints handling. Each of these issues is discussed in more detail below.
Data privacy

The issue

PCWs typically collect a large amount of information about their customers, especially in relation to searches that can only be facilitated by detailed personal information (such as a quote for car insurance). This information may often be re-used by the business for purposes other than facilitating a comparison of quotes, for example it might be used for marketing purposes. Information may also be passed on by PCWs to third parties who might then further pass it on. In this situation the information might be put to a wide range of uses. The Data Protection Act 1998 (DPA) requires that all businesses collecting personal data explain to consumers who is collecting their information, what they intend to do with their information and with or to whom their information will be shared or disclosed. The DPA also provides that all consumers can prevent the use of their information for direct marketing purposes.

The Information Commissioner’s Office

The Information Commissioner’s Office is the UK’s independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

The ICO enforces a range of legislation covering information, communications and privacy, including the Data Protection Act 1998, the Privacy and Electronic Communications Regulations 2003 and the Freedom of Information Act 2000.

The ICO gives guidance to individuals and organisations and takes appropriate action when the law is broken. The ICO has published a Code of Practice that all price comparison website operators should follow.

The ICO also rules on eligible complaints. A complaint can be made here.
Our findings

Our web sweep identified that a number of sites could improve their privacy policies by making them clearer, especially with regard to the uses that third parties might make of the data if it is passed to them and the identities of those parties. We also found that websites could do more to proactively draw consumers’ attention to the privacy policy before they enter, or in the future upload, personal information.

Data protection is central to consumer trust

The OFT takes the view that shortcomings like this undermine consumer trust. A consumer survey of internet users conducted for our Online Targeting of Advertising and Prices market study (May 2010) found that 58 per cent of respondents were highly worried that the information collected might be used for other purposes than advertising – privacy and trust were key concerns.5

Furthermore, a survey of online consumers for the OFT’s Advertising of Prices market study (December 2010) found that of those respondents who considered PCWs to be poor for some products or services, 37 per cent cited data privacy as a reason – they considered that the sites can sometimes pass on their details which can result in unwanted emails or unsolicited phone calls.

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5 Online Targeting of Advertising and Prices, May 2010, OFT1231, p.34 Chart 5.2 and Annex B p.14 para 4.10), see www.oft.gov.uk/OFTwork/markets-work/online-targeting#named4
Transparency of information

The issue

PCWs are not always transparent about how search results are presented. In particular, it is not always clear how results are ranked and the effect that any commercial relationships may have on the ranking. Similarly claims regarding the proportion of the market that has been searched are not always fully clear or appropriately qualified. In some cases PCWs do not explain the identity of the business operating the website.

Better explanations

Where descriptions of the methods used by PCWs lack detail or are not particularly prominent, we are concerned this may lead some consumers to assume that PCWs commonly rank products based on the commission received when in reality this may not be the case. Any lack of trust may be exacerbated when the type of ranking, by its very nature, is difficult for the consumer to verify independently, such as ranking by popularity or ranking by relevance.

Offering different types of ranking may be of particular benefit to consumers, as it permits a more sophisticated consideration of value and product characteristics than simple price ranking. However, in our view, non-price ranking is less easily understood and care should be taken by comparison providers to ensure that the mechanism for ranking products and the role, if any, of commercial relationships in that ranking mechanism is explained in clear, accessible language. The omission of material information in relation to the ranking process may in some circumstances breach the Committee of Advertising Practice’s UK Code of Non-broadcast advertising, Sales Promotion and Direct Marketing (CAP Code) and may also in some circumstances breach the Consumer Protection from Unfair Trading Regulations 2008 (CPRs).
The Advertising Standards Authority

The Advertising Standards Authority is the UK’s independent regulator of advertising across all media.

The ASA investigates and adjudicates on potential breaches of the Advertising Codes, and proactively checks the media to take action against misleading, harmful or offensive advertisements.

As well as investigating advertisements in print, on television or radio, or sent by e-mail or text, the ASA’s remit also extends to online advertising including:

- banner and display advertisements
- paid-for (sponsored) search
- marketing on traders’ own websites and in other spaces they control like social networking sites.

This means the ASA’s remit extends to marketing claims made on price comparison websites which under certain circumstances would include statements about how rankings are produced and promotions.

A complaint can be made to the ASA here.

We also consider that statements similar to, ‘we’ve searched the market’ or ‘we’ve found the best deal’ should be qualified in circumstances where the entire market has not been searched. We consider this will address two issues. First it will prevent consumers from assuming a search is more comprehensive than it is. Second, the increased transparency may help reassure consumers who may be concerned about the exact level of coverage and who may perhaps think that it is lower than it actually is. Overstating market coverage may breach the CAP Code. If a statement about market coverage is untrue then it may mislead the consumer in relation to the nature of the service, the main characteristics of the service, the existence of a specific price advantage and the consumers’ rights or risks and therefore may breach the CPRs.

We consider that it would also help consumers if PCWs stated clearly and prominently how frequently they update their information on prices and stock availability. In particular, failure to include information that is material with regards to the accuracy of prices and stock availability may be a breach of the CPRs.
Clear distinctions
We consider that, from the consumer’s perspective, it is vital there is no confusion over whether a particular offer represents a comparison result based upon objective criteria, or a promotion which may be based upon commercial relationships between the comparison provider and the product vendor. While including both types of offer on the same website may have benefits for both the consumer and the business, in our view a clear distinction between the two is necessary to ensure that trust is maintained and extended. It is also important, in our view, that comparison websites also clearly explain the nature of any affiliate or commercial links they have with the vendors whose products appear on the website. Failure to disclose ownership links and commercial relationships where that information is material to a consumer’s decision making may breach the CPRs and may also breach the CAP Code. A failure to disclose the identity of the business operating the website is a breach of the Electronic Commerce Regulations 2002.

Our findings
Our web sweep identified that standards could be improved with some websites providing only limited information about ranking methods and market coverage. Of even greater concern was the fact that some websites did not display clear information about the identity of the business operating the website or any information regarding the commercial relationships the business had with the vendors of products compared.

We consider that a lack of transparency can have the effect of allowing often unfounded concerns to develop. A survey of online consumers for the OFT’s Advertising of Prices market study (December 2010) found that among consumers that used price comparison websites a substantial majority (81 per cent) did not always purchase through the PCWs. When asked why, 17 per cent gave the reason that they were not independent, 13 per cent said it was because some PCWs were owned by the suppliers of the products being compared and four per cent said they were untrustworthy. Among PCW users generally 76 per cent considered they have at least some drawbacks and ‘not being independent or impartial’ was a drawback reported by 39 per cent. Of consumers in this latter group, that is people who did not consider PCWs to be independent or impartial, 27 per cent considered that ‘only the companies that pay the most get to the top of the results list’.6

Consumers appreciate more information
There is also evidence that consumers would consider greater transparency helpful. Two-thirds (66 per cent) of consumers supported the idea of PCWs stating clearly which suppliers they receive payments from, and over half (53 per cent) would like the main suppliers covered by the site to be listed in order to make the websites more reliable.\(^7\)

The available evidence also suggests that consumers understand more quickly when information is transparent than when it is obfuscated. For example, studies show that providing consumers purchasing flights with an upfront schedule of the costs associated with surcharges improved consumers’ understanding of the variability of those charges between airlines.\(^8\)

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\(^7\) Advertising of Prices, December 2010, OFT1291, Chapter 9, see www.oft.gov.uk/OFTwork/markets-work/advertising-prices/#named4

Exclusion of liability and complaints handling

The issue

Responsible traders make provision for complaints and redress in their terms and conditions and in their dealings with consumers. While there are some price comparison businesses that already have good practices in this regard there are a significant number whose policies are such that they are likely to undermine trust and confidence not just in the specific business concerned but perhaps also in the sector more widely. In particular, we are concerned about the practice of including in the terms and conditions a general exclusion of liability in relation to search and comparison services. It is our view that in many circumstances this is unlikely to be compatible with the Unfair Terms in Consumer Contract Regulations 1999 (UTCCRs). We are also concerned that it is virtually impossible for a consumer to contact some comparison businesses, either because there are no contact details given for the purpose of raising a complaint and/or because the website does not disclose the identity of the business operating the website. Failure to provide material information in relation to complaints handling may breach the CPRs.

Citizens Advice

Citizens Advice helps people resolve their legal, money and other problems by providing free, independent and confidential advice. This is provided face-to-face in over 3,500 community locations in England and Wales, by telephone and e-mail, and online.

Citizens Advice also has a role in influencing policymakers by campaigning for improvements to the policies and practices that affect its clients.

Consumers with a concern about a price comparison website should contact Citizens Advice, who will provide advice or channel the complaint to the appropriate regulator.

Visit [www.adviceguide.org.uk](http://www.adviceguide.org.uk) or call the Citizens Advice helpline on 08454 04 05 06.
Our findings
Our web sweep found that some websites did not have clear complaints and redress policies while some attempted to exclude all liability for the search and comparison services provided. A good quality complaint and redress policy as well as clear contact details are particularly important in situations where there is the potential for things to go wrong. The survey of consumers carried out for the OFT’s Advertising of Prices study found that, of those people who had used a PCW in the previous 12 months, 16 per cent thought that PCWs did not deliver on their intended purpose of finding a good or best priced deal. While not all of those consumers will have wanted to make a complaint, consumers who do want to complain should be provided with the means to do so.
Our response to the issues

The OFT work in relation to the issues identified in its web sweep and discussed at the regulatory roundtable are in addition to the work that the OFT and other regulators have already undertaken and will continue to take forward in relation to PCWs as and when it is appropriate to do so. A well functioning sector for ‘choice engines’ is vital in order to achieve the Government’s consumer empowerment objectives but it will also reward those businesses with the best standards and expand the sector overall.

The role of business

We believe that businesses operating in the price comparison sector have a key role to play in ensuring that they serve to further consumer choice and enable consumers to make appropriate decisions.

Our key messages are in response to the concerns that we have identified. We want PCWs to:

- **Ensure that their privacy policies are clear** and adhere to both the Data Protection Act 1998 and the ICO’s Code of Practice, including providing information about the uses to which third parties to whom data might be passed, will put that information and about the identities of those organisations. That is important so that consumers can make an informed decision whether to opt out of data being shared with third parties or being used for marketing purposes. Screenshot 2 provides an example of a proactive measure to improve consumer awareness of the privacy policy.
• **Be clear about the way search results are presented.** The basis of different types of search result (that is, ranking by relevance) as well as featured deals and offers need to be clearly explained so that consumers can distinguish comparisons based upon objective criteria from promotions that may be based upon commercial relationships. Screenshot 1 provides an example of how detail in relation to comparisons and promotions can be provided in a prominent manner.

• **Be clear about the nature of the search.** The market coverage of a search should be clearly explained and information regarding the frequency with which pricing and stock availability information is updated should also be provided.

• **Ensure that there is a clear complaint and redress process** in relation to complaints about comparison and search services. Do not exclude liability for these services which in many circumstances is likely to be incompatible with the UTCCRs.

• **Ensure clear identification of the business operating the website,** its address and any commercial relationships it may have with the vendors of goods and services compared.
Clearly, these are just some of the steps a price comparison site might make in order to promote greater trust. Other steps, such as following regulatory guidance, signing up to accreditation schemes and the Confidence Code and carefully monitoring CPRs and UTCCRs compliance will all help. Taking this package of steps, which we urge all PCW operators to consider carefully, should be seen as complementary to the points set out above.

To highlight these messages we have written to 100 leading PCWs operating across various sectors outlining our expectations that their websites are trustworthy, comply with the relevant law and include all necessary information that consumers need to make the best choices.
Consumer awareness

We believe that empowering consumers with information when using PCWs will improve their experience and help them save money. It will also help level the playing field for price comparison businesses as better informed consumers will in principle choose websites with higher standards. This helps consumers but it also rewards businesses that adopt higher standards. To this end, we have launched a consumer awareness campaign, focusing on six key messages to highlight to consumers how they can make best use of PCWs and to bring to their attention issues of which they may be unaware. The six key messages reflect our core concerns discussed in the previous section of the report - data privacy, transparency in relation to a range of matters and complaint and redress policies.
1 Protect your data

We consider that standards in relation to privacy policies could be significantly higher. The ICO have produced guidance for all businesses to follow in relation to privacy policies. Many of the policies we reviewed could improve in terms of clarity and prominence, in particular by providing more detail about the identities of the third parties with whom data might be shared and the purposes to which it will be put. In addition, websites could do more to draw consumers’ attention to these policies and the opt-outs that they contain. Our advice to consumers is:

- Always read the information these sites provide (usually in a privacy policy but sometimes in the part of the terms and conditions dealing with data and privacy).

- If you do not want your personal information to be passed to other companies, check to see if there is the ability to ‘opt out’ on the website, for example by ticking a box to say that you do not give your consent for your information to be shared.

Screenshot 2 provides an example of where to find a privacy policy or the correct part of the terms and conditions, and screenshot 3 provides an example of an ‘opt out’.
2 Make sure you make the comparison most helpful to you

One of the advantages of competition in the price comparison sector is that it promotes innovation. Many sites have developed search offerings that go beyond standard price ranking by allowing consumers to rank by relevance or popularity. These options have the potential to allow consumers to make more sophisticated searches that better reflect value rather than just price alone. However, by their nature such searches are less transparent than a simple price ranking and a lack of transparency can work to undermine trust, especially if consumers confuse different rankings. Our advice to consumers is:

- **Make the comparison which is most helpful to you** - check if your results are presented by relevance, price, or popularity and check what the website says about how often it updates its information on prices and availability of goods. Screenshot 4 highlights what to check about search results.

![Screenshot 4 – Order of search results](image)
3 Don’t assume the site has searched the entire market

PCWs are an important tool in consumer empowerment but they are not a complete substitute for shopping around. The evidence of consumers’ attitudes towards the partial coverage of many PCWs is mixed. Our survey evidence suggests that 47 per cent of consumers think PCWs are flawed because they only have partial market coverage but 55 per cent of consumers use PCWs as a starting point for a wider or more detailed market search. Our advice to consumers is:

- **Use a number of different sites** - Expressions like 'we’ve found the best deal' or 'we’ve searched the market' don’t guarantee you are seeing every available offer in the market, so always check out what is on offer on a number of different sites.

4 Check the identity of the trader

Consumer confidence will be promoted if all PCWs state prominently the identity of the trader operating the business and its business address. This is particularly important when considered together with complaints policies. Our advice to consumers is:

- **Know who you are doing business with** - Check whether the site tells you the identity of the business (not just the name of the website) and their business address. By law they have to do so.
5 Use an accredited site if you can

Consumers who are unfamiliar with PCWs or who have concerns about their reliability, should be reassured by using an accredited or government backed website. Our advice to consumers is:

- **Do your homework** - If you can, use an accredited site as part of your search as they have met certain standards for accreditation. Some websites comparing energy products are accredited by [Consumer Focus](#), and some telecoms comparison websites are accredited by [Ofcom](#). Some financial services are compared by the Government backed [Money Advice Service](#).
6 If in doubt, speak to Citizens Advice

There are a number of regulators with responsibilities for the activities of PCWs, some of these responsibilities are discrete and others overlap with the result that it can be confusing for consumers to understand their rights. We have worked with Citizens Advice to create a one-stop shop to help consumers navigate through the complexity. Our advice to consumers is:

- **Problem or complaint? Citizens Advice can help** Some sites may tell you that they are not liable if they make mistakes or mislead you, this may not in fact be the case. If you want to complain but aren’t sure how, Citizens Advice can help you to direct your complaint to the relevant person. Visit [www.adviceguide.org.uk](http://www.adviceguide.org.uk) or call the Citizens Advice consumer helpline on 08454 04 05 06

These messages have been promoted across a variety of media and to a wide range of stakeholders by the OFT and our partners.

Other organisations have also published helpful information for consumers. On its website, Which? has published [advice on how to avoid some of the pitfalls associated with price comparison websites](http://www.which.co.uk) alongside consumer satisfaction data relating to PCWs.
Summary

- PCWs play a central role in consumer empowerment.
- Used effectively PCWs have the potential to help consumers make even greater savings.
- There may be some people who are currently more sceptical of PCWs than is necessary - greater transparency may go some way to addressing this.
- The OFT has set out a series of simple tips for consumers that, if followed, should help ensure consumers have a better experience and get a better deal.
- At the same time the OFT has set out its expectations for PCW operators.
- The OFT has worked closely with its partners, in particular the ICO and the ASA. Consumers who want advice or wish to make a complaint about a PCW can contact Citizens Advice for help.
Useful links

Better deals, better choice: Consumers powering growth – BIS
www.bis.gov.uk/betterchoices

Internet shopping – an OFT market study
www.oft.gov.uk/OFTwork/markets-work/internet

Advertising of Prices - an OFT market study
www.oft.gov.uk/OFTwork/markets-work/advertising-prices

OFT shuts unlicensed websites to protect borrowers

Investigation into the transparency of heating oil distributors websites
www.oft.gov.uk/OFTwork/consumer-enforcement/consumer-enforcement-completed/heating-oil/

CAA and OFT consult on consumer rights guidance for travel sector

Can 'fair' prices be unfair? A Review of Price Relationship Agreements - OFT

Empowering consumers of public services through choice-tools
www.oft.gov.uk/OFTwork/publications/publication-categories/reports/advocacy/oft1321

OFT urges top retailers to change their websites

OFT publishes strategy for protecting consumers shopping online
Attitudes to online markets - OFT

Online targeting of advertising and prices – an OFT market study
www.oft.gov.uk/OFTwork/markets-work/online-targeting

Personalised pricing call for information
www.oft.gov.uk/OFTwork/markets-work/othermarketswork/personalised-pricing-cfi/

Information Commissioner’s Office Code of Practice

Complaining to the Information Commissioner’s Office
www.ico.gov.uk/complaints.aspx

Complaining to the Advertising Standards Authority
www.asa.org.uk/Consumers/How-to-complain.aspx

Citizens Advice
www.adviceguide.org.uk

Consumer Focus confidence code
www.consumerfocus.org.uk/get-advice/energy/confidence-code

Ofcom price comparison
consumers.ofcom.org.uk/price-comparison/

Money Advice Service price comparison tables
www.moneyadviceservice.org.uk/en/categories/comparison-tables