

# Credibility on the web

An international study of the credibility of consumer information on the internet



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Copies of the other Consumers International studies mentioned in this report, *Disputes in cyberspace*, *Consumers@shopping*, *Privacy@net* and *Should I buy?* can be downloaded from the Consumers International website at: www.consumersinternational.org.

Alternatively, copies of the reports are available from Lalani De Silva at Consumers International. Our address and phone numbers are on the back of this report.

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# **Executive summary**

The flexible and interactive nature of the internet means that more and more consumers are using it as a source to gather information on almost every subject imaginable, from finding the best deal on a flight, to gathering information about health problems<sup>1</sup>.

However, much of the information available on the internet is not impartial. Some websites present only one view of an issue, or promote the products of certain companies. Consumers are more used to dealing with commercial influence elsewhere, and deciding how far they trust information and advice. These judgements are more difficult in the online world – there are few of the familiar cues and clues of the bricks-and-mortar world, the printed page or a face-to-face interaction to help judge the credibility of information.

Consumers International has developed a definition of credibility for online information and established criteria to measure it. Between April and July 2002 a project team representing 13 countries assessed 460 websites, covering information on health conditions, financial products, and prices for travel and consumer goods, using these criteria.

The assessment reveals that consumers need to exercise caution when using the internet as a source of information. To make informed judgements about the value of information, consumers need to know about:

 the ownership of a website, its identity, partners and sponsors;

- the quality of information they are given, such as how up to date and comprehensive it is, the identity of underlying sources, and the authority of people providing advice;
- whether site content is independent of any commercial interests, or if there is a link, what that relationship is; and
- whether they will be asked to give personal information, what the site will do with that information and what steps it will take to protect it.

This study shows that many sites are failing to provide adequate details in these areas, leaving consumers potentially at risk from inaccurate, incomplete or even deliberately misleading information. Exaggerated or vague claims by sites about their service add to the confusion. The result can be wasted time or money; with some types of information, such as health information, the consequences of following wrong or inappropriate advice could be much more serious.

This report warns consumers to check a site's background before making any decisions based on information they receive from websites. It calls for business to adopt best practice and provide more transparent information in order to build consumer confidence. It calls for governments to contribute to that confidence-building by ensuring that existing laws in the offline world are applied equally online and ensuring that existing standards are enforced.

<sup>&</sup>lt;sup>1</sup> A survey by the Pew Internet and American Life project in the USA in January 2002 found that of the 113 million Americans who have used the internet at some time, 75% have researched a product or service before buying, 64% have looked for health information and 47% have got financial information. The UK-based Which? Online Annual Internet Survey found in 2002 that holiday sites, personal finance sites and price comparison sites were among the top ten most frequently visited types of website.

### Introduction

Previous investigations by Consumers International into consumers' experiences when using the internet have focussed on the buying process. Four previous studies² have investigated the quality of information given about goods and site practices, delivery performance, privacy protection and redress. This project investigates a different type of website – that which purports to act on the consumer's behalf, offering advice, information and guidance.

The internet offers great potential to empower consumers as never before. It offers an excellent opportunity to carry out research, edit and present information, sift and compare prices, and find deals on behalf of the consumer. The potential benefits are great: consumers can save time in research and shopping around; get comparative quotes from different companies quickly; save money by finding good deals and cheap prices; get access to sources of information and to small businesses that they would not otherwise know about. The increased competition and choice offered by the way the internet opens up markets to small businesses is also a significant potential benefit.

If consumers are to take advantage of this potential to use the worldwide web to find information, compare prices and obtain advice, it is important that they are able to identify sources of information which they can trust. Just as when shopping for goods in the real world, consumers need to be able to find online retailers that are reliable and will fulfill

their promises. Justified consumer confidence is vital, and websites will only achieve this and the consequent commercial benefits through the provision of reliable information.

In this project, Consumers International set out to define credibility in online information; to develop criteria for measuring credibility; and to assess a broad range of sites according to these criteria. The project was an experimental one, providing the opportunity to develop and refine a methodology and a measurement tool that can be used for future work in this area.

#### 1.1 Why credibility matters

#### 1.1.1 Judging the background to information

Consumers seeking information, whether online or elsewhere, need to be able to place that information in context in order to assess its value to them, and whether they can trust it. In the 'real' world consumers are used to making judgements about context as they are familiar with it - information from an encyclopaedia may have a different value to information in magazine articles, for example. Advice obtained from a salesperson in a shop on what product to buy is valued differently to advice from a consumer magazine. In the online world, it can be difficult to work out what the context is, as the usual visual clues are missing – all there is is the appearance of the web pages. The potential for consumers to be misled by inaccurate or deceptive information is therefore greater.

<sup>&</sup>lt;sup>2</sup> Disputes in cyberspace, Consumers@shopping, Privacy@net and Should I buy? See page 2 for details of how to get hold of these reports

#### 1.1.2 Assessing the reliability of information

If the information on a website is out of date, incomplete, not written by an authoritative source, or is biased (that is, influenced by commercial interests – see 4.2 'Definitions of key concepts', page 18), consumers using information may waste time or make the wrong decision. Consumers using information obtained online might make a decision based on that information alone, without consulting a professional or a salesperson to filter that information as they might offline. Decisions and transactions can be conducted very quickly online, without time for reflection. This increases the need for information to be reliable.

#### 1.1.3 Presentation of information

The web also presents potential problems for consumers in the way information is presented. In the offline world in many countries, there is a requirement for editorial content and advertising or sponsored material to be clearly identified, and consumers are familiar with spotting the difference in magazines and other printed material. In the online world there is often a blurring between editorial and commercial content, and many consumers are not so familiar with the way information is presented. Sites that provide lists of 'good deals' also adopt many presentational tricks for making certain deals catch your eye (for example, placing certain items at the top of a list or otherwise highlighting them). Consumers may not be aware that these lists are not always based on what is best for them.

#### 1.1.4 Transparency

There is always a risk that the information and advice provided by websites will be influenced in some way by the business interests of the provider. There are many opportunities for websites to construct business opportunities and relationships based on the way consumers use the site (for example, clicking on links to buy a product), and these are not always apparent to the consumer. The bias might be in the information itself (for example, information written by a pharmaceutical sponsor on a health site); or it may be in the way that certain 'good deals' are promoted to the consumer above others. If this bias is not clear

to the consumer, then the consumer can be deceived or misled.

#### 1.1.5 Privacy

Unlike the offline world, where consumers can browse anonymously in shops, in the online world consumers usually have to reveal a fair bit about themselves in order to obtain information from a website. Sometimes this requirement to reveal information is legitimate, since it may be needed in order to tailor the advice to a consumer's circumstances. However, too often, personal information is collected when it is not necessary to provide the information being sought, and the website is using the consumer's visit as an opportunity to collect personal data.

#### 1.2 Consumer detriment

Consumers using information online that is not credible face a number of potential problems. In particular, we found that consumers should be wary of the following.

#### 1.2.1 Money-saving claims

If the site is not transparent about how it selects the 'best' products and prices, the user can be misled into buying something that is not the most suitable or the best value. For financial products such as life insurance or mortgages, the effects of a poor choice could be considerable and last for many years.

#### 1.2.2 Time-saving claims

It takes a fair amount of time to use a website properly, whether searching for information about a health condition or for financial or other products. This time is completely wasted if at the end of the process it is clear that the information is out of date, or is incomplete due to the limited market coverage (the proportion of the potential market covered by the site's research – see 4.2 'Definitions of key concepts', page 18).

#### 1.2.3 Privacy issues

When using websites to obtain information consumers are often asked to divulge personal information. Sometimes this information can be used to identify them and to contact them in the future, or to sell their details on to

another business. If the site does not have a privacy policy, the consumers lose control over their personal information.

There is also the more serious concern that a consumer obtaining poor quality or misleading health information, and acting on it without consulting a doctor, could be putting their health at risk.

#### 1.3 Project aims

The project had five particular aims.

## 1.3.1 Develop an operational definition of credibility

Before setting out to assess credibility, we had to define what credibility is. This was no small task, as credibility is a subjective psychological concept, and very much to do with the perception of the user. Finding a definition that worked with an international team added to the challenge. Defining credibility and finding reliable ways of measuring it are complex, and this project was approached as a learning exercise, to see if agreement could be reached about what credibility was, and if so, how it could be assessed.

#### 1.3.2 Develop criteria for credibility

Once we had defined credibility for the purposes of our study, we had to break the definition down into a set of factors which we could measure. Taken together, these factors, or criteria, are what make information credible.

### 1.3.3 To test these criteria on a broad range of websites

Once we had determined the criteria for credibility, we had to establish whether these could be used to assess websites, and to see whether they would apply to a broad range of different types of site based throughout the world.

# 1.3.4 Create a tool for assessing websites for consumer organisations to use for future studies

As this was a pilot study, we wanted to see if we could develop a measurement tool (in this case, a questionnaire) which could be used in the future to assess a larger number of websites.

# 1.3.5 Find out how a range of sites performed against the criteria and identify where the main problems with credibility lie

Our testing of the criteria on a broad range of websites also provided us with the opportunity to test out the performance of those sites, and to see where the potential problems for consumers really lie. As well as giving us a set of findings for website practice, this also fed back into the development of the criteria and measurement tool, enabling us to determine whether we had captured all the key elements within credibility.

#### 1.4 Defining credibility

We use the term 'credible' in this study to describe sites that have policies and procedures in place to provide consumers with the information they need to make an informed decision about using a website. When consumers approach a site in search of information, they may have a range of expectations. They may expect the information to be up to date, comprehensive, based on expert opinion, impartial and accurate. A credible site will provide the user with information about these factors, so that the consumer is able to form an opinion about whether they can trust the quality of the information. We cannot measure credibility as such as this is a subjective perception on the part of the consumer. However, we can measure whether a site provides information that enables the user to make an informed judgement about its value.

It was not part of this study to assess whether the advice or information given by the sites was accurate, or whether prices found were the cheapest available. The results of such an exercise would be transient, and would be limited in applicability purely to the sites under assessment. Our aim was to investigate the underlying practices and policies of the sites in order to see whether they provided sufficient information for a consumer to form their own judgement about whether to trust a site. A site that meets all or most of the criteria for credibility certainly has the framework in place to be able to offer a trustworthy and transparent service to the consumer. It is always possible for a credible site to make a

mistake and give inaccurate information. Likewise, it is possible for a site without transparent and credible disclosures to find good deals for the user. However, as it is not possible for Consumers International to assess all sites for all consumers in order to find the best ones, to aim to develop a toolkit with which consumers and consumer organisations could establish which sites can be trusted is a useful starting point.

#### 1.5 Criteria for assessment

When assessing the sites, we were looking for information in the following areas. We also assessed whether the information was easy to find and clearly signposted for consumers.

#### 1.5.1 Information about the site itself

- the identity of the site, address of site and address for customer contact;
- who owns the site:
- the identity of site partners and sponsors, and any relationship between the content (information, advice and prices) and commercial interests, in the form of partners, commercial affiliations or advertisers; and
- a clear statement about appropriate use of site, who it is aimed at, what sort of service it provides.

#### 1.5.2 The quality of the information on the site

- the authority and credentials of people responsible for information on the site, and sources for information (particularly relevant for sites giving advice);
- market coverage (what proportion of the market the site covers when searching for deals – particularly relevant for sites selecting products and providing prices);
- the timeliness of information; and
- transparent presentation of information; any commercial influence on presentation clearly identified.

#### 1.5.3 Site practices

- no exaggerated or misleading claims;
- personal information collected only when it is necessary for that transaction; and
- an appropriate privacy policy.

#### 1.6 Types of site in the study

There is a huge range and diversity of sites giving information on the internet. At one end of the spectrum are sites which have no commercial interest in giving information, but provide it as part of their wider remit. This might include sites run by government, NGOs, regulatory bodies, academic and charitable sites. At the other end of the spectrum are sites that provide information purely as a means of selling something, for example, a life insurance company which gives some general information about types of life insurance but ultimately exists to sell its own policies.

We excluded from our study sites that appeared to have no commercial involvement in their site, and also websites of companies which sold only their own products or services. All other sorts of information sites were included in our study.

The way that sites provide information varies greatly, too. Some sites provide information in a general way, as in a book or magazine, for example. In other words, the information is presented in a standard format, not tailored to individual needs. Other sites use the opportunity provided by the internet to tailor their advice to specific circumstances or requirements. For example, a health site might obtain information about the site visitor's health in order to give advice about a condition; or a site might tailor its recommendations on mortgages to a consumer's particular financial circumstances. We included both sorts of sites in our study.

# Key research findings

This study had five specific aims, as outlined in the introduction (see 1.3 'Project aims', page 7). Here we outline the key findings for each of those aims. There are more detailed results of all the aspects examined in 'Research findings in detail', page 20.

# 2.1 An operational definition of credibility

Through discussing the issues surrounding credibility and trust we were able to separate these into two main areas:

- those to do with subjective perceptions such as reputation, image, use of colour, layout and other presentational factors; and
- those to do with the value of information itself, such as impartiality, comprehensiveness, timeliness and authoritativeness.

By concentrating on those areas to do with value of information, which lend themselves to objective measurement, we were able to come up with a definition of credibility:

For the purposes of this study, a 'credible' site is a site that provides information that is sufficiently clear and accessible to allow consumers to make an informed decision about the value of the information provided by the site (see 1.4 'Defining credibility', page 7).

#### 2.2 Criteria for credibility

Once the definition of credibility and the focus on information disclosure was established, a list of dimensions of clear information was developed. Additionally, other work on guidelines for good website practice was examined.

It quickly became apparent that some dimensions were 'core' in that they applied to whatever type of website was considered (for example, issues of ownership and identity). Other dimensions were applicable to a particular type of site (for example, providing information about the identity, authority and credentials is essential for people giving advice in health sites, but is less relevant for sites that find cheap airfares).

A questionnaire was developed that incorporated many of the elements on the list. Through a process of testing and feedback on a range of sites, the list of criteria and the questionnaire were refined to concentrate on a manageable number of core measurable criteria, with some additional criteria that were critical to particular types of sites.

#### 2.3 Testing the criteria

We tested the criteria by assessing a range of websites. We concentrated on websites giving information about health issues, financial products and sites that shop around for good deals (deal finders).

Researchers carried out an initial calibration exercise where the 15-member team used the questionnaire to assess the same two sites over the same two days. Their answers were analysed to identify any inconsistencies of definition, which given the international nature of the team, was particularly important. The questionnaire (and accompanying guidance notes) were further refined to ensure maximum clarity and consistency. Once the criteria and the questionnaire had been finalised, researchers used the questionnaire to assess 460 websites based in 13 countries.

# 2.4 Creating a tool for assessing websites

We succeeded in developing a questionnaire that can be used by experienced researchers to assess the credibility of websites. This questionnaire can be used to assess the core dimensions of credibility that apply to all types of site. We would recommend that more work is done in the future to develop specific additional criteria and corresponding questions to probe issues that are specific to each type of site (for example, health sites or travel booking sites). The USA-based Consumer WebWatch project is developing category-specific criteria in a range of areas<sup>3</sup>. It would be very valuable to expand this work internationally.

There are a number of important issues raised during the research that our methodology did not address. It would be useful to know more about how consumers use websites to gather information and make decisions. More research is also needed to investigate consumers' attitudes towards issues of trust. Knowing the extent to which consumers are sceptical about results and use a range of sites when shopping around for deals or information, and whether they rely on online sources alone or compare them with information obtained offline, might affect our judgement about how transparent sites need to be.

An additional issue which needs further research is the relationship between the credibility-enhancing information disclosure on a site and the quality of its actual content or output. It would be a valuable extension of this pilot project to assess whether sites with good disclosure practices do in fact give more accurate or comprehensive results than less credible sites.

#### 2.5 Assessing credibility on a range of websites

Although many of the 460 websites assessed did an adequate job of disclosing key information, we found a number of problems. The following is a summary of what we found. For more about the methodology, see 'Research methodology', page 16, and for a more detailed explanation of the results, see 'Research findings in detail', page 20.

#### 2.5.1 The source of the information

- More than a quarter (30%) of sites provided no address, and a third (33%) did not provide a phone number.
- A quarter (26%) of the sites gave no clear information about who owned them.
- In the majority (60%) of cases there was no information provided which would allow consumers to form a judgement about whether the site's content is influenced by its commercial interests (for example, partners, sponsors or advertisers), or whether it is independent. Only 40% of the sites in our study made any statement about the relationship between their commercial interests and their content.
- In 17.5% cases where sites search for and present price comparisons or best buys, the basis for the prioritisation of their listings of recommendations was unclear (that is, the products or retailers were not sorted by price or alphabetical order). This could indicate that there is a commercial bias in the listings. If commercial influence on the content is not transparent, consumers could be misled.

<sup>&</sup>lt;sup>3</sup> A grant-funded project of Consumers Union, the non-profit publisher of Consumer Reports magazine and ConsumerReports.org – visit www.consumerwebwatch.org for more about its work

#### 2.5.2 Judging the reliability of the information

- More than half (55%) of sites said nothing about how up to date their information was, and only about a quarter (27%) of sites gave specific information about how up to date their content was. In the case of sites giving advice on health matters, this means that users cannot judge whether the advice is based on the latest research; in the case of sites that find good deals, the prices might be out of date.
- Many sites giving advice on health and financial matters failed to provide information about the authority and credentials of the people behind that advice. Two-thirds (65%) of health sites and a quarter (24.5%) of finance sites gave information about credentials some or all of the time. Even when this information was provided, it was not always thorough enough to help the consumer to make an informed decision. Of those sites that did provide information, this was only judged to be 'full' information (that is, both the identity and the credentials of the individual) with half of the health and finance sites (49% and 50% respectively). For the remainder of the sites, information was either partial (that is, the identity was given but not credentials), or it was vague and general.
- Only a little over half (57%) of general advice sites gave sources for that advice, and 41% of sites that recommended products gave sources for their prices. Even when sites did provide source information, it was not always comprehensive or specific. In one in six (17%) cases, sources were incomplete, not covering all relevant material on the site. In a further 17% of cases, the source material was vague, and not helpful to consumers wanting to know more.
- Around half the sites (47%) which recommended products made a statement about their market coverage (that is, how much of the market or how many companies they search in their quest for good deals) but only a quarter (26%) made a specific statement. This means that in at least half of cases where researchers were using sites to find good prices it was not clear how extensive the search was.

#### 2.5.3 Poor practice

- Almost half (49%) of sites failed to give a
   warning about the appropriate use of their
   information. For example, they did not
   warn consumers searching for health or
   financial advice that they should consult a
   professional before taking a decision; or
   they did not warn that their advice was
   limited to one geographical area.
- The majority of sites (62%) contained claims, most of which were vague and non-specific.
- Many sites collected personal information from users when it is not appropriate or essential for receiving the requested information or advice. The majority of sites (80%) collected personal information, even though in many cases, our researchers were only browsing for information. When browsing online, it is not possible to be anonymous as when visiting and bricksand-mortar retailer.
- Less than two thirds (61%) of sites that collected personal information had a privacy policy to inform users how such information is used and protected.
- Some sites claimed to offer a service that they did not provide, using the net as a way of attracting business and obtaining individuals' personal information. We found a number of sites that seemed to offer a price comparison service, but which couldn't even compare products, provide prices, or enable consumers to buy a product online. This finding is anecdotal and could not be quantified in this study, as researchers noticed it and reported back as the assessment exercise was in progress. However, it is a clear indication of misleading practice online.

# 2.6 Examples of independence issues

Judging whether information is completely independent, unbiased or free of commercial influence can be difficult. The following examples demonstrate some of the experiences noted by our researchers.

However, in many cases, they demonstrate when consumers should question the independence of the information they are being given, rather than as absolute proof of commercial influence.

- Healingwithnutrition.com (Australia) stated: 'our purpose is to help our customers live longer in good health. We do this by providing the most advanced and reliable information, products and therapies in the world.' This site provided a lot of information about health and seemed to sell a wide range of products, yet on closer inspection, it was promoting and selling the products of just one company.
- Breastfeeding.com (USA) mixed news, advocacy, advertising and sales pitches freely, with no clear boundaries between editorial content and commercial interests. Advertising was not clearly identified, and under a 'News and features' heading, staff discussed the merits of products as if it were impartial editorial content.
- Netpatient.dk (Denmark) had a page for travel insurance. At the top of the list of policies was one of the site's sponsors, and it appeared in the middle of the page, rather than being listed alphabetically along with the other companies mentioned.
- Allergietest.nl (Netherlands) was owned by a pharmaceutical laboratory, and much of their supposedly general advice and information was linked to their own tests.
- **Bestpriceeu.com** (Denmark) claimed to be 'an independent and consistent source of prices on virtually any product sold in the EU', yet displayed a 'Category Top Five' listing for all types of product. The top five were almost always Sony products, and there was no explanation of the basis for this selection.
- Nextag.com and Bizrate.com (USA) both provide information on deals on computers.
   Both stated (but only in a section aimed at merchants, not at consumers) that merchants pay to be placed higher up in their rankings of deals chosen for

- consumers. In our searches, the cheapest computer for our researcher came some way down the listings.
- Kelkoo.com (USA) had partners whose products appeared as 'recommendations' before a proper search was conducted. There was no clear statement about who the partners were or how they influenced content or product listings.
- Insweb.com and Lowermybills.com (USA) both provided life insurance quotes. Their rankings were not listed according to price, and it was not made clear how their rankings worked. Insweb.com placed the most expensive quote second on its list, despite the fact that it was 150% more expensive than the cheapest quote.
- Vliegwinkel.nl (Netherlands) provided information about flight deals. The site always placed KLM flights first in their listings, although KLM was not the cheapest.

### Recommendations

Consumers International's research reveals significant issues and problems in relation to the credibility of information and advice provided by websites. Here we outline what business and governments should do to improve matters, to ensure that consumers aren't misled. We also outline steps that consumers should take before acting on advice they get from the internet.

# 3.1 Recommendations for consumers

#### 3.1.1 Don't believe everything you read

Many websites promise great savings in terms of time and money, and give the impression that they will do extensive research on your behalf. These promises may be exaggerated. There are some websites that are comprehensive and impartial in their coverage. These may well find you useful information or a good deal, and save you considerable time. With other sites, you may end up wasting time and get information that is incomplete, out of date or influenced by commercial interests. Consumers need to approach sites with caution, and check out how they operate before spending valuable time on the site, or making decisions based on the site's information.

#### 3.1.2 Don't rely on just one site

If you are looking for information or a good deal, you should always use a number of sites and compare the results, rather than relying on one site. But beware of different shopping sites that use the same search engine to find their prices, and therefore end up with similar results. It's always a good idea to compare the best price you can find online with offline prices as a double-check.

#### 3.1.3 Check the site's background

Make sure you have an idea of who you are dealing with by doing the following.

- Look for a business name, a geographical ('real-world') address, and other contact details for the business and for consumer contact.
- If it's a site that appears to give general information and advice, find out who is behind it. Check who owns the site and whether there are any partners and sponsors who might have a vested interest in the information provided.
- If it's a site that recommends products, see whether there are any claims about whether its recommendations are impartial, or whether it is clear about commercial influences on its recommendations. If it lists deals for you, look at how those deals are ordered if they are not in price or alphabetical order, a retailer or manufacturer may have paid to have their product placed in a more prominent position.

On a good site, most of this information should be easy to get to from the home page, so it won't take long to establish whether the site is likely to be worth using.

#### 3.1.4 Check how reliable the information is

• If the site gives advice, look for the authority and credentials of the people behind that advice. Look for sources for its advice, so that you can find out for yourself whether it is authoritative or something you would be prepared to rely on. Check whether you are told how up to date the information is.

 If the site recommends products and prices, check whether it explains how much of the market is covered in its searches, and how up to date its deals are.

### 3.1.5 Check what risks you might be taking by using the site

- Provide only personal information that you think is necessary to use the site or conduct the transaction. Many sites collect personal data when they don't need to. If you think that a site is demanding too much, vote with your mouse and use another site.
- Read the site's privacy policy, particularly if you're asked to give personal information. Check how your personal data will be used, and if you have the option of refusing unsolicited mail, e-mail or calls. (Within Europe, it is against the law for businesses to use your personal details for marketing purposes unless you have explicitly given your consent.) If a site collects personal information but doesn't have a privacy policy, don't use that site. Consumers International's report on privacy online, Privacy@net, published in January 2001, contains more detailed advice to consumers on how to protect your privacy online. See page 2 for how to get hold of this report.
- Where appropriate, seek advice from a qualified professional (such as a doctor, in the case of health advice) if you're thinking of taking action as a result of information you received from a website. A good site will warn you that you need to do this.

# 3.2 Recommendations for business

#### 3.2.1 Providing clear information

In order to improve the credibility of the information provided on their websites, businesses must ensure they provide clear information that is easy for consumers to find (that is, clearly signposted from the home page). Businesses should do the following.

 Provide information about the identity of the site, who owns it, a geographical address, phone number and e-mail for the business and also for consumer contact.

- Provide information aimed at consumers about any relationship between the commercial interests of the site (such as partners or advertisers) and the content. If content is kept completely separate from commercial interests, make a clear statement about this. If there's a link, explain what it is.
- Any sponsored material or advertisements on the site should be clearly identified as such, and differentiated from content.
- Sites that give information and advice should provide verifiable information about the authority and credentials of the people behind that information, and sources.
- Sites that find products and prices should give information about how extensive their searching of the market is and how they rank products in their listings.
- All sites should give specific information about how up to date their content (including price information) is.

#### 3.2.2 Comply with consumer protection laws

Businesses operating websites must ensure that they abide by the national laws that already exist in the offline world. In particular:

- Businesses must not make excessive claims on their sites, either in their advertising or in the way they describe how they work, and should be able to substantiate and fulfil any claims and promises they do make.
- Businesses must abide by data protection and privacy laws. They should not collect personal information from consumers unless it is essential for the transaction or service being provided. Businesses collecting personal information on their sites must provide a clear and accessible privacy policy. They must not collect or use that personal data without the prior consent of the consumer.

Consumer Webwatch in the USA has produced a similar set of general guidelines which sites can follow to promote their credibility, and it is developing specific guidelines for different industry sectors. Guidelines for airline ticket-booking websites

already exist<sup>4</sup>. Businesses should refer to these guidelines to complement those provided above.

The OECD has published guidelines on electronic commerce<sup>5</sup>. These have been in the public arena for three years now, but our study indicates that the majority of businesses are still not meeting these standards. The OECD has provided useful examples of good and bad practice to assist businesses in adopting good practices<sup>6</sup>.

Finally, business should work with consumer organisations in developing national guidelines.

# 3.3 Recommendations for governments

National governments should ensure that businesses operating in the online world comply with existing laws, for example, on data protection and fair advertising. Some form of surveillance is necessary to ensure that websites are operating within the law. Where appropriate, governments or their agencies should monitor practices online and take action, where necessary.

National governments should work with consumer organisations to encourage further research and to educate consumers about their rights and responsibilities.

The OECD Guidelines call for member governments to 'work towards building consensus, both at national and international levels, on core consumer protections to further the goals of enhancing consumer confidence, ensuring predictability for businesses, and protecting consumers'. Our findings in this study clearly demonstrate that governments need to focus more attention on this area.

Our research has shown that the OECD Guidelines as they stand are narrow, and fail to address important credibility issues. Given how much the internet is used by consumers

as a source of information and advice (as well as for purchasing goods and services), it is vital that the Guidelines cover:

- the extent of the market coverage (how much of a market is surveyed by those sites that find or choose products and prices);
- how up to date the information and advice provided on a website is;
- the authority and credentials of people behind the advice;
- sources for advice; and
- the relationship (if any) between the commercial interests of the site and its content.

<sup>&</sup>lt;sup>4</sup> At www.consumerwebwatch.org/bestpractices/travelguidelines.htm

<sup>&</sup>lt;sup>5</sup> 1999 OECD Guidelines on Consumer Protection in the Context of Electronic Commerce

<sup>&</sup>lt;sup>6</sup> At www.olis.oecd.org/olis/2002doc.nsf/linkto/dsti-cp(2002)2-final

# 4 Research methodology

To ensure we were carrying out a truly international investigation, Consumers International drew on its wide-ranging membership, involving researchers in 13 countries. The detailed research methodology needed careful design and refining to ensure consistency of results throughout the world.

The methodology used in this project, involving a team of researchers based around the world assessing websites using a standard questionnaire, with results collected and analysed centrally, has been successful in previous Consumers International projects<sup>7</sup> so was adopted again for this study. Each time the Consumers International team carries out research in this way, lessons are learnt, methods are refined and researchers obtain more experience, thus improving the quality of the data collected.

List of participating countries:

Australia

Belgium

Canada

Denmark

France

Germany

Hong Kong<sup>8</sup>

Italy

The Netherlands

Portugal

Spain

UK

USA

Names and contact details of the organisations from each country that participated are in Appendix 1, page 32.

The project team met three times during the course of the project: once to agree the criteria and methodology, to discuss the questionnaire and to establish consistency in completing the assessment; once to examine the preliminary results; and at the end of the project to agree recommendations and future work.

A detailed questionnaire was developed based on the core criteria for credibility. Developing the individual questions and establishing whether they would apply across the range of sites under investigation was a complex process. Many of the issues we were trying to assess, such as apparent bias, did not lend themselves easily to straightforward questions. The questionnaire underwent a lengthy process of development by a small subgroup, followed by piloting by the full project team, and finally a calibration to ensure consistency of approach and understanding. The final questionnaire used for the site assessments is attached as Appendix 2, page 34.

Assessments were carried out from April to July 2002.

#### 4.1 Choice of sites

We chose to focus on sites providing information to the consumer for this project, as previous projects have assessed sites that sell products and services. In order to narrow down

<sup>&</sup>lt;sup>7</sup> Disputes in cyberspace, Consumers@shopping, Should I buy? and Privacy@net

<sup>&</sup>lt;sup>8</sup> Throughout this report we refer to Hong Kong rather than China, because the Hong Kong Consumer Council was one of the participating organisations, and because Hong Kong's consumer market remains distinct from that of mainland China. However, websites based in Hong Kong, China and Taiwan feature in the study.

the potential field of types of sites for inclusion, we used two methods of prioritising.

- Those areas where the risk of consumer detriment if the consumer makes a poor decision is potentially high. Consumers obtaining health advice online are clearly at risk if that advice is faulty; consumers buying financial services online also face a greater risk than with many other services as the length and scale of the commitment is unusually great.
- Those areas where companies are using the technology available via the internet to offer a new form of service to the consumer, whereby they offer to act on the consumer's behalf, searching out a good deal for them. As these sites claim to be shopping around on the consumer's behalf and finding suitable products, it's important for consumers to be able to judge how effectively they are doing this.

As a result of this prioritisation process, we decided to concentrate on sites within three main categories:

- sites giving information on health issues;
- sites giving information on financial issues and financial products; and
- sites which search the internet for prices for particular products and services, which we have called 'deal finder' sites in this report.

In order to find sites within these three groups, we approached the internet with a range of common scenarios that we hoped would encompass most credibility issues facing consumers. For health sites, researchers approached the sites wanting to find out about breast cancer, prostate cancer and about an allergy (food or hay fever). For finance sites, researchers searched for mortgages and life insurance. For deal finder sites, researchers posed as shoppers looking for a computer, a flight and car rental and wishing to compare prices.

In some countries researchers found it difficult to fill the quota for the number of sites in each category, as the market is less developed in some countries than in others. In particular, researchers in Portugal and Spain had difficulty locating deal finder sites.

We wanted to find sites in a way that closely reflected how a consumer would locate sites. The majority of sites were found via a search engine, portal or index page. Other routes such as personal referral or recommendation, from a media report, or prior knowledge of the researcher were also acceptable, in order to reflect how consumers find sites.

Our aim was to use the sites as a real consumer would, so that our experience of the transparency and accessibility of the site was realistic. In each case we explored as far as was necessary without actually buying products. We assessed each site once, using one scenario.

Most of the sites (60%) were found through a search engine; 14% by referral or recommendation from friends, family or colleagues; 6% by reading about them in various media; and 14% were found through prior knowledge of the site.

#### 4.1.1 Type of service offered by sites

We have analysed the sites by the type of service they offer, as follows:

- General advice sites, which offer general information and advice only, and do not enable the consumer to buy products or services from the site, either directly or by way of links. This group accounted for 20% of the sites in the study.
- Recommendation sites, which enable the consumer to purchase products or services.
   In some cases, these are specific recommendations, tailored to personal circumstances, arrived at after the site visitor answers various questions. In other cases, the recommendations were more general, made without requiring much personal information. This group accounted for around three-quarters (73.5%) of the sites in the study.

Table 4.1: Number and location of websites

	Total	Health sites	Finance sites	Deal finder sites
Australia	30	6	12	12
Belgium	30	0	15	15
Canada	30	10	10	10
Denmark	30	20	0	10
France	37	24	1	12
Germany	33	11	12	10
Hong Kong <sup>1</sup>	30	5	10	15
Italy	30	8	11	11
Netherlands	30	6	12	12
Portugal	10	6	4	0
Spain	30	20	10	0
ŪK	62	11	17	34
USA	78	15	46	17
TOTAL	460	142	160	158

<sup>1</sup> Includes sites in Hong Kong, China and Taiwan

Health sites were most likely to offer general advice – 81% of health sites worked in this way, compared with 18% of finance sites and 1% of deal finder sites.

Consumers International believes that the more a site sets itself up to act on consumers' behalf, tailoring its recommendations, and in many cases gathering personal information, the more important it is that the site is credible and transparent about how it operates. If a site is recommending a product as the best for a particular consumer, the consumer needs to know the underlying basis for that selection, so that they can judge the value of its choice.

#### 4.2 Definitions of key concepts

Some of the features and aspects of websites we were assessing were complex, and open to interpretation. Early on in the research design process, we developed clear definitions of these concepts to ensure that assessments were being made on a consistent basis by our international team of researchers.

#### 4.2.1 Easy to find

It is important that information about key issues such as their market coverage, their privacy policy and even their address is easy to find on the website. Over the course of three previous studies into website practices, the

project team have been developing a definition of 'easy to find' that works for all types of site. We have defined 'easy to find' as whether the the information is available on, or signposted from, the home page. We define the home page as the first full page for the website (This does not include introductory pages of graphics, or an introductory page that separates users by language or country into different home pages).

The number of mouse clicks needed to get to the information can vary as long as it is a straightforward progression. For example, if a home page contains a link to something that is obviously consumer information (for example, terms and conditions) and, after clicking, there is a further link to the required information, that constitutes easy to find.

The key disclosures should be located where a consumer with no prior knowledge of the site could reasonably expect to find them. A range of locations might be suitable for locating key disclosures, depending on what is being searched for (for example, 'Information', 'About us', 'Terms and conditions', 'Who we are', 'How this site works'). FAQs also count as easy to find as long as the information being sought is easily found by clicking on FAQs. If a key disclosure is hidden at the bottom of a long list of FAQs, it is not considered easy to find.

If a key disclosure is hidden away in a section most consumers would not reasonably check (for example, 'Information for investors', 'Press room', 'What's new' or 'Help'), it is not considered easy to find.

Key disclosures should be available from the home page, as a consumer might want to check them before deciding whether to use the site. If they are also signposted at the relevant place in the site (for example, a privacy policy signposted at the point personal information is collected) this is even better practice, but it is not essential in order to meet our criteria.

A secondary test of 'easy to find' was whether signposting was clear. The navigation tools (links and buttons) should be clear and easy to read. For example, fonts that are too small to read and light colours that do not show up against the background do not constitute easy to use.

Language used on links or buttons should be clear and in plain language rather than jargon. Presentation of navigation tools and language used should be as consistent as possible.

#### 4.2.2 Bias

If the information provided by a site is 'biased', it means that it is not independent and neutral. Biased information is influenced, usually in this context by commercial interests, although bias can be created by the opinion of an individual, or by an imbalance in the way information is collected.

#### 4.2.3 Market coverage

Market coverage refers to the proportion of the total potential market that a website covers in its research. It is most commonly an issue in relation to deal finder sites, which aim to search a market to find the best product and/or price for a consumer. If a website covers all or the majority of companies in the market it is searching, then its market coverage is extensive; if it only covers a few companies, then its market coverage is limited.

#### 4.2.4 Clear statement

For a number of questions in our assessments, we asked whether there was a 'clear statement' about aspects of a website's information or service (for example, about market coverage).

In our definition of clear statement, we were fairly generous to websites. We were looking for something that provided clear and unambiguous information to consumers; this did not necessarily have to be encapsulated in one phrase. Sometimes it was very clear from the context, or from a number of different messages.

# Research findings in detail

Here we give more detailed results from our study for all the aspects of credibility of website information that we examined. For a copy of the questionnaire used in the study, see Appendix 2, page 34.

We have analysed each of the aspects of credibility that we have looked at in two different ways – by type of website, and by type of service offered.

The first column in each of the tables in this section (total) gives the overall percentage for the aggregated results. The following columns are for the different types of website.

- Health, covering those sites that provided information about breast cancer, prostate cancer and allergies;
- Finance, covering those sites that provided information about life insurance and mortgages; and
- Deal finder, covering those sites which researchers visited to get prices for a computer, a flight or car rental.

The next section of each table is the type of service offered:

- General advice, which refers to sites that only gave advice, rather than selling products or services directly (though they might include advertisements and links to commercial sites).
- Recommendation, which refers to sites from which consumers can buy products or services online, and that recommend

particular products to consumers, either in a general way or as a tailored recommendation.

In some cases, columns of figures do not add up to 100%. This is because 'don't know/not stated' answers are not included.

#### 5.1 Contact with the site

Ideally consumers should be provided with two addresses when using a website: a geographical ('real-world') address where the company that owns the website is located, and an address for customers to contact. The address for the website itself is important.

- It enables a consumer to see where a website is based (and therefore which country's laws and regulations apply).
- It provides reassurance that the website does have a 'real-world' identity.
- It provides a means of verifying if necessary the legitimacy of the business.

In addition, it is good practice to provide an address clearly marked for customer contact, so that consumers know exactly how to contact the site for any follow up communication or redress. In many cases this may not be the same as the head office address for the company. It is important that sites provide a geographic address as well as e-mail and phone contact.

The OECD Guidelines for Consumer Protection in the Context of Electronic Commerce specify that businesses must give

Table E 4.	Dravision	of contact	information
Table 5.1:	Provision	or contact	information

Type of site	Total	Health	Finance	Deal finder
	%	%	%	%
Geographical address of business	65	62.5	68	65
Customer contact	48	42	47	53
Both	43	39	44	46
Neither	30	35	28	27
Phone number	66	60	71	66

Type of service	General advice	Recommendation
	%	%
Geographical address of business	56	69
Customer contact	43	50.5
Both	38	45
Neither	39	25
Phone number	52	70

their legal name and address, and should facilitate 'prompt, easy and effective' communication with consumers.

Fewer than half the sites in our study lived up to best practice, or to the OECD standards, by providing both addresses. More than a quarter did not provide either their address or a customer contact address, which could cause problems for consumers seeking redress.

Sites that recommend products in some way were more likely to provide address information than sites that gave general information and advice, with a quarter providing no address at all compared with more than a third of general sites.

In most cases where the site did provide an address, it was easy to find (87%).

#### 5.2 Site ownership

Ownership of the site is important when examining credibility, as it relates to possible conflict of interest and bias. A consumer using a site may want to establish whether that site has links to a parent organisation, or is part of a group of companies, in case that might have a bearing on the nature of the information provided. Many users might not be interested in such information, but if a consumer does want to investigate this, it should be easy to do so. Ideally sites should provide a clear statement within a section such as 'About us', explaining who owns the site.

Table 5.2: Site ownership				
Type of site	Total	Health	Finance	Deal finder
	%	%	%	%
Independently owned	37	44	36.5	30
Owned by another organisation	32	29	31	36
Ownership unclear	26	25		

Type of service	General advice	Recommendation
	%	%
Independently owned	47	33
Owned by another organisation	22.5	37
Ownership unclear	29	25

Our researchers looked to see whether each site said anything about who owned it, and whether it was privately owned or part of another organisation. We found that in more than a quarter of cases (26%), it was unclear to our researchers who owned the site.

#### 5.3 Claims

In order to entice consumers to venture beyond the home page, sites make claims about what they offer. These claims tend to fall into two categories:

- those relating to the credentials of the site itself (for example, long established, largest); and
- those relating to the quality of the information they provide (for example, best prices, lowest fares, 'we will save you money').

We found that 62% of sites made some sort of claim. Not surprisingly, sites recommending products were more likely to do so than sites offering general information and advice.

Ideally, claims made by sites should be specific, relevant, verifiable, and backed by evidence, allowing the consumer to make an informed decision about whether to use the site. We found that many claims made by websites are impossible for the consumer to verify and, even if true, do not guarantee a good quality service (for example, 'longest established', 'largest', 'most comprehensive').

The OECD Guidelines state that 'businesses should not make any representation ... that is likely to be deceptive, misleading, fraudulent or unfair'; and 'businesses should be able

to substantiate any express or implied representations ...'.

Many deal finder sites make claims about their service, such as 'find all the best travel deals in one place', 'sniffing out the lowest electronics prices on the web' and 'tracks down the best rates in the insurance jungle'. Consumers should treat these with great caution for a number of reasons.

- 'Best' can have a range of meanings including most suitable for a consumer's particular circumstances; from established companies; a good combination of price and convenience; or simply the cheapest.

  Alternatively, it could simply mean the cheapest price available from a very limited range of suppliers that the website happens to do business with.
- In the case of life insurance sites, many sites gave premiums for illustrative purposes only, and warned that prices vary when consumers submit their personal information in order to take out a policy.
   Some car rental companies also gave illustrative prices only.

Sites that attract consumers with non-specific or irrelevant claims diminish their own credibility as they can raise suspicions in the consumer's mind about trustworthiness.

We found some sites that made misleading claims about the very nature of the service they offered to consumers. These sites appeared to offer a price comparison service across a range of products, drawing the consumer in by promising a good deal. In fact, they sold only their own products or services. Some didn't sell anything online – they used

Table 5.3: Claims about the service	provided			
Type of site	Total %	Health %	Finance %	Deal finder %
Any claim about quality of service	62	42	79.5	62
Type of service	General advice		Recommend	dation
Any claim about quality of service	37		70	

the internet only as a means of a way of collecting personal data. They did not provide prices online, but wanted to be able to call consumers in order to sell something.

Tigerquote.com and Loanweb.com, both USA-based sites, worked in this way.

We also came across a few sites that claimed to be independent or unbiased, yet appeared to show bias in the way their listings of deals or prices were presented. For example, the **Pricescan.com** website stated 'Check out our unbiased price and product information', and stated that vendors cannot pay to change or upgrade their position in listings of prices and retailers provided, yet some listings are given prominence by being in a bold typeface. The **Price.com** website stated 'a free and unbiased search engine' yet has 'featured' and 'premier' vendors, which appear first in the rankings of products.

#### 5.4 Disclaimers and warnings

More than half (57%) of sites in our study made some sort of statement about whether or not they took any responsibility for the advice or recommendations they were offering. In the vast majority of cases (85%), these statements disclaimed responsibility.

Disclaimers in themselves do not diminish a site's credibility, as long as what is being disclaimed is relevant and legal, and presented in the form of a constructive warning to users about reasonable limitations. Sometimes the disclaimer, which is often hidden within terms and conditions or legal information, is used as an opportunity to disclaim anything and everything, making the information provided by the site effectively meaningless. The effect of this sort of allembracing disclaimer might be to mislead consumers into thinking they have no rights to redress if something goes wrong.

Disclaimers, however extensive, cannot take away consumer rights that are established by law.

Two of the excessive disclaimers we found were from US-based 123termlifeinsurance.com and Expedia.com (USA- and UK-based).

#### 123termlifeinsurance.com

'The materials and information in this site are provided 'as is' and without warranties of any kind either expressed or implied. Gary R. Lardy, 1 2 3 Term Life Insurance, and its affiliated and subsidiary companies, disclaims all warranties, express or implied, including, but not limited to, implied warranties of merchantability and fitness for a particular purpose.

It is your responsibility to evaluate the accuracy, completeness and usefulness of any opinions, advice, services or other information provided. All information contained on any page is distributed with the understanding that the authors, publishers and distributors are not rendering legal, accounting or other professional advice or opinions on specific facts or matters, and accordingly assume no liability whatsoever in connection with its use. Consult your own legal or tax advisor with respect to your personal situation.

In no event shall Gary R. Lardy, 1 2 3 Term Life Insurance, and its, affiliated and subsidiary companies, be liable for any direct, indirect, special, incidental, or consequential damages arising out of the use of the information herein.

#### Insurance Rate Information

The information used in all insurance rate quotes have been taken from the rate cards and rate manuals which life companies routinely publish and distribute to life agents and brokers. To the best of Gary R. Lardy's ability, he has done everything he can to ensure that the insurance rate information contained in any insurance rate quotes is up-to-date and accurate. However, he cannot guarantee accuracy.

All quotes are for illustration purposes; actual premiums and coverage will be based on age, health history, certain underwriting criteria, location, sex, and tobacco usage. Not all policies or companies are available in all states. Federal copyright law prohibits commercial use by other agents, brokers and parties marketing insurance products or information.

In the event that there is a discrepancy between the information contained in the insurance rate quotes, and any insurance company-authorized illustration and/or policy, the policy shall govern.'

#### Expedia.com

'The information, software, products, and services published on this web site may include inaccuracies or typographical errors. Changes are periodically added to the information herein. Expedia, inc. its affiliates and/or its respective suppliers may make improvements and/or changes in this web site at any time. Expedia, inc. and/or its respective suppliers make no representations about the suitability of the information, software, products, and services contained on this web site for any purpose. Expedia, inc. shall use reasonable care and skill in carrying out the services contained in this web site. Expedia, inc., its affiliates, and/or its respective suppliers hereby disclaim all warranties, terms and conditions with regard to this information, software, products, and services, including all implied warranties, and conditions, of merchantable quality, fitness for a particular purpose, title, and noninfringement. In no event shall Expedia, inc., its affiliates and/or its suppliers be liable for any, indirect, incidental, punitive, special, or consequential damages arising out of or in any way connected with the use of this web site or with the delay or inability to use this web site, or for any information, software, products, and services obtained through this web site, or otherwise arising out of the use of this web site, (including, but not limited to loss of use, data, profits, savings or opportunities), whether based on contract, tort, strict liability or otherwise, even if Expedia, inc., its affiliates, or any of its suppliers has been advised of the possibility of damages,

except in relation to liability for death or personal injury for which no limit applies. Expedia, inc., its affiliates and/or its respective suppliers shall be liable for direct loss arising out of the use of this web site, whether based on contract, tort, strict liability or otherwise, up to a maximum of the total value of the transaction under which the claim arises for any one event or series of connected events. This does not affect your statutory rights as a consumer.'

Nevertheless, some disclaimers can be helpful to consumers if they warn users about who the site is aimed at and suitable for, and how it should be used. For example, the information on some sites may be applicable only in the country of the site's origin, so might be inappropriate to consumers living elsewhere. Or a site might warn consumers that they should consult a doctor if they have serious concerns and that information provided is intended as a supplement to, rather than replacement for, professional advice.

Half the sites in our study (51%) made some sort of warning about the appropriate use of their service. Health sites were much more likely to do this (73.5%) than finance sites (50%) or shopping sites (32%).

In the case of health sites, the vast majority of these warnings said that the advice given should only be used in conjunction with a consultation with a professional such as a

Table 5.4: Disclaimers					
Type of site	Total	Health	Finance	Deal finder	
	%	%	%	%	
Disclaimer of responsibility	85	84	87.5	84	
Accepts limited responsibility	11	10	11	13	
Advice has country/regional limitation	22	5	46	20	
Professional advice should be sought	55	91	41	6	
Information is time-limited	19	10	22	32	

General advice	Recommendation
%	%
85	84.5
6	13
7	28.5
88	44
7	25
	<b>%</b> 85 6 7

doctor. In the case of finance sites, the most common disclaimer was that the information and advice given on the site was limited to a particular country or region. It was also common on finance sites to find warnings that advice should be used in consultation with a professional adviser. A few deal finder sites also contained warnings, usually to do with the fact that the information given had a time limit (so might go out of date), or that it was only relevant to one country or region.

#### 5.5 Market coverage

When using a site that purports to find a good deal on a product or service, whether it be a mortgage, life insurance, car rental or a computer, the proportion of the market that the site will cover in its search is important. The key issue here is transparency. It is acceptable for a site to have limited market coverage as long as it is clear to the consumer what those limitations are. When a 'good' price is offered, the consumer can then evaluate that price, and compare it with other sites in the full knowledge that the site has not covered the whole market. Best practice is for sites to provide a clear and specific statement at an early stage in the process about what proportion of the market they cover.

Only half the sites that recommended products in some way made a statement, however

vague, about their market coverage. So half the deal finder sites left the consumer in the dark about how extensive that service was. Finance sites were better than others at making some sort of statement, at 60%.

Where a statement was made, it was generally easy to find (82%). More finance sites (87%) has easy-to-find statements about market coverage than health sites (69%) or deal finder sites (81%).

For those sites that did provide a statement about market coverage, we examined that statement to see how clear it was. Just under half (45%) of those statements were specific, stating either that the site covered the whole market, or that it covered a certain section of the market, making it clear what that section was. In 14% of cases there was not an explicit statement, but it was clear from the way the site presented information what the market coverage was (for example, by providing a list of companies that the site covered or included). In 40% of cases the information provided was vague, and therefore not useful to the consumer in evaluating the recommendation given.

In summary, only 19% of the total number of sites in our study, and 26% of those selling and recommending items to the consumer made a specific statement about their market coverage.

Table 5.5: Information about market coverage					
Type of site	Total	Health	Finance	Deal finder	
	%	%	%	%	
Any statement of market coverage <sup>1</sup>	47	28	60	46	
Specific: covers whole market	12	10	10	15	
Specific: explains sector covered	33	31	42	22	
Non-specific: but self evident	14	34.5	12	8	
Non-specific: unclear	40	14	37	55	

General advice	Recommendation
%	%
24	52
19	11
50	29
6	15
6	45
	<b>%</b> 24 19

<sup>1</sup> Excludes sites where market coverage was not relevant

# 5.6 Presentation of price and product information

Presentation of price and product information is another key issue in a site's credibility. If a site is biased in the way it selects products by commercial interests, one of the most likely places that this bias will reveal itself is in the way price selections are presented to the consumer. Do the products that appear at the top of the list, or are shown to the consumer first, deserve their priority placing on grounds of value alone, or are other influences being brought to bear? Some sites highlight certain prices, for example in bold. Others refer to 'preferred' providers and prioritise these. These may well not be the cheapest prices in the listings, but the site has a vested interest in promoting them.

These practices are to some extent mitigated if the site makes a transparent statement about the reasons behind its prioritisation of results. Consumers may still be misled if they do not question the results, but at least the investigative consumer can establish what forces are at play.

Best practice in terms of providing consumers with a transparent and flexible service is to allow the user to determine their own priorities in terms of trading off price against features or other elements of the deal. We found that only 16% of sites that recommend products offered users a choice of how results were presented. The main options available, in addition to sorting by price or alphabetical order were to sort on:

- aspects of the product itself, such as time/convenience (for flights);
- specification details (for a computer);

- type of car or pick-up times (for car rental);
   and
- type of loan (for mortgages).

A few companies (including traveljam.com, travelselect.com, onetravel.com, skt-tours.com) offered the option of sorting by 'preferred company', although it was not always clear why a consumer would want to do this.

If sites do not offer a choice to the consumer of how results are presented, it is vital that the basis of their listings is clear. Yet we found that in about one in six cases (17%) where sites recommended products and prices, the basis for the prioritisation of suitable or recommended products, retailers or service providers was unclear to our researcher - the listings were not sorted by price or alphabetical order, and the rationale for the order was not apparent. This could mean that there was a bias in the way information was presented that was not apparent to the consumer, and therefore the consumer could be misled into buying something that was not the best deal.

#### 5.7 Information about timeliness

Whether a site is providing general advice (for example, a health site advising how to treat a particular illness), or providing price information, it is important that users of that site can find out how up to date the information is. Price information is worthless if out of date, and a consumer could waste a lot of time searching an out-of-date site. With health related information it is important that consumers know whether they're getting the latest advice.

Table 5.6: Presentation of prices and products						
Type of site Total Health Finance Deal find						
	%	%	%	%		
Choice of list sorting methods	17	2	7.5	28		
No choice: sorted by price	37	0	41	45		
No choice: sorted alphabetically	12	26	10	10		
No choice: other clear basis	6	4	3	9		
No choice: no clear basis	14	35	9	11		
	_					

<b>Table 5.7:</b>	Details	of timel	iness of	information	1

Total	Health	Finance	Deal finder
%	%	%	%
28	38	17	29
10	9	8	14
17	28	14	12
7	12	5	4
5	4	4	6
	<b>%</b> 28	%     %       28     38       10     9	%     %       28     38     17       10     9     8

Type of service	General advice	Recommendation
	%	%
Any information about timeliness	35	27
Frequency of content updates	12	11
Date of last content update	27	16
Details only for some content	15	5
Non-specific details of timeliness	2	6

Best practice is to give specific information about when the content of a site was last updated (this is not the same as having a date on the home page saying when the site was last update) and/or how frequently it is updated. If different content is updated at different rates then specific information should be given for each section (for example, price information may need to be updated much more frequently than general advice).

More than half of the sites in our study (55%) did not give any information at all about how up to date their content was. Even more (68%) didn't give any date information at all on the site, regardless of whether this date referred to content. Health sites were best at giving this information, with 57% saying how up to date their content was, compared with 39% of price comparison sites and 32% of finance sites. Sites giving general information and advice rather than recommending products were more likely to give date information (58%, compared with 40%).

Even when sites did give information about how up to date their content was, that information was not always helpful. We found that in 67% of cases where a site gave date information, that information was specific (that is, it stated the frequency of updates – daily or weekly, for example – or it stated when the content was last updated). However, in 28% of cases, the information was either vague or incomplete.

In summary, only 28% of the total number of sites in our study provided specific information about how up to date their content was.

#### 5.8 Source information

Sources or references should be provided for general information and advice, such as health advice, so that consumers know who is behind the advice and where it has come from, and can find out more and check on credentials and background should they wish. In the case of sites that provide prices for financial products and goods, it is useful to know the source of their prices (for example, direct from suppliers, or via a third party).

We found that 57% of general advice sites gave sources for that advice, but only 41% of sites that recommended products gave sources for their prices.

Health sites were much better than other types at giving sources (65%), compared with finance sites (17%) and deal finder sites (7%).

Even when sites did provide source information, it was not always comprehensive or specific. Less than two-thirds (63.5%) of sites that did give some sort of source information did so in a way that covered most or all of the relevant information on the site. In 17% of cases, sources were incomplete, and did not cover all the relevant material on the

Tahla 5 8.	Provision	of source	information
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Type of site	Total	Health	Finance	Deal finder
	%	%	%	%
For all relevant information/advice	24	23	11	39
For most relevant information/advice	14	16	11	16
For some relevant information/advice	10	14	16	0
Vague source details only	10	15	11	5

Type of service	General advice	Recommendation
	%	%
For all relevant information/advice	25	25
For most relevant information/advice	14	15
For some relevant information/advice	11	10
Vague source details only	14	9

site. In a further 17% of cases, the source material was vague and therefore not helpful to consumers wanting to know more.

In addition to providing sources, sites can make things easier for consumers by providing hyperlinks to the source, but only 31% of sites did this most or all of the time.

#### 5.9 Authority and credentials

In addition to looking for information about sources or references, we assessed whether the sites told consumers anything about the authority or credentials of the people providing the advice on the site. It is particularly important in the case of sites giving health information to know whether the people behind the advice are qualified doctors or health practitioners. In the case of sites giving advice on finance matters, it can also be relevant to know whether the advisers are qualified.

However, only around two-thirds (65%) of health sites and a quarter (24.5%) of finance sites gave credentials information some or all of the time.

Table 5.0	. Authority	and ar	dontiala
Table 5.9	: Authonty	and cre	eueniiais

Type of site	Total	Health	Finance	Deal finder
	%	%	%	%
Gave details in all cases	25	37	15	20
Gave details in some cases	18	28	10	13
Gave details in few or no cases	53.5	31	72	64
Full details provided	22	32	12	20
Partial details provided	10	19	5	
Only general details provided	8	11	7	3

Type of service	General advice	Recommendation
	%	%
Gave details in all cases	36	22
Gave details in some cases	26.5	15
Gave details in few or no cases	32.5	60
Full details provided	30	19
Partial details provided	17	8
Only general details provided	12	7

Even when this information was provided, it was not always thorough enough to be satisfactory to the consumer wanting to know more. Full information (that is, the identity and the credentials of the individual) was given by half of both the health and finance sites. For the remainder of the sites information was either partial or it was vague and general.

#### 5.10 Commercial influences

It is best practice for sites to make a clear statement to their users about the extent to which their content is influenced by commercial considerations. We would not expect all sites to present information in a completely impartial manner – the vital thing is that the consumer is made aware of any commercial pressures so that they can take this into account when evaluating the information given. Some sites make a point of stating that their content is completely separate from any business interests. Others make a clear statement that their business interests do influence content (for example, that advertisers' products get priority in their listings).

We found that 40% of sites visited made some sort of statement about the relationship between business and site content. Finance sites were most likely to provide such a statement, doing so in 52% of cases, compared with 32% of health sites and 33.5% of shopping sites. Sites that recommended products in some way were more likely to make a statement than sites giving general information and advice (42%, compared with 31.5%).

Making a clear statement about business influence on content is not much use unless consumers are able to find it easily.

We found that such information was located in a section clearly intended for consumers in only around a quarter (27%) of cases. In 13.5% of cases it was clearly intended for potential business partners rather than consumers. Health sites were most likely to locate the statement on a page clearly intended for consumer use; shopping sites were most likely to direct it at potential business partners.

We examined the content of these statement.

- In 17% of cases, sites said that they had no commercial interests, so their content was completely impartial (most common on health sites).
- In 17% of cases, sites stated that their commercial interests were completely separate from their content.
- 21% of sites stated that there was some relationship between content and their commercial interests. Shopping sites were most likely to make this sort of statement.
- 24% of sites claimed to be independent (for example, on their home pages or in their general description of the site) but did not say anything specific about the relationship between content and commercial interests. Finance sites were most likely to do this.

In a few cases, sites did not make a specific statement about the relationship between content and business interests, but it was clear to our researcher from other information on the site that there was a link. The most common example of this was that only products from affiliates or partners were included on the site. So there was obviously a strict limit to the site's market coverage, but nothing specific was said about this.

We did find some examples of clear and useful statements about independence, including the following, from two USA-based sites.

#### WebMD.com

'WebMD News is an independent media service designed to provide news, information, and educational material to consumers. News content created by WebMD is free from influence by sponsors, partners and other sources ... WebMD keeps its News staff separate and distinct from staff dedicated to sponsors or partners ... Material generated by WebMD staff must disclose information about financial relationships or other interests that might influence the outcome of a study or the commentary from an individual ...'

	_			
Table 5 10:	: Statements	about	commercial	interacte
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Total	Health	Finance	Deal finder
%	%	%	%
7	10	5	5
7	7	7	6
8	6	8	11
9.5	1	21	5
60	65	47	66.5
	% 7 7 8 9.5	%     %       7     10       7     7       8     6       9.5     1	%     %       7     10       5     7       8     6       9.5     1       21

Type of service	General advice	Recommendation
	%	%
No commercial interests	8	6
Commercial interests have no influence	8	7
Commercial interests have some influence	2	10
General claim of independence only	7	10
No statement about commercial interests	66	58

#### Pricerunner.com

'It is important to us that Pricerunner.com presents information in a way that is both independent and easy to understand. This is why consumers and independent organisations write all the product reviews on our site ...

Pricerunner.com is not owned by, or dependent on, any manufacturer, retailer, or organisation that could have an interest in giving biased information in any way ... guaranteed to be independent and objective'.

In 16% of cases where sites made no statement about the relationship between content and business interests, (and this was in just over half of the sites in our study), our researchers felt that there was some commercial influence on the way results or information was presented. This was most likely to be the case

on health sites. See 2.6 'Examples of independence issues', page 11, for more about this.

Just over half (52%) of the sites in our study contained advertisements of some sort (we included unsolicited links to other sites in our definition of advertisement). Deal finder sites were most likely to contain advertising (65%), compared with 60% of health sites and 33% of finance sites.

Of those sites that did contain advertising, 24.5% made a specific statement about whether its advertisers had any influence on the site content. Health sites were most likely to contain such information (37%), compared with 13% of finance sites and 20% of deal finder sites.

Table 5.11:	Advertising	on websites

Type of site	Total	Health	Finance	Deal finder
	%	%	%	%
Contains advertising	52	60	33	65
Claims no advertising-content link	7.5	16	3	4
States an advertising-content link	3	1	1	6

Type of service	General advice	Recommendation
	%	%
Contains advertising	51	54
Claims no advertising-content link	15	6
States an advertising-content link	1	4

Table 5.12: Personal Information and priv	ersonal information and privacy				
Type of site	Total	Health	Finance	Deal finder	
	%	%	%	%	
Personally-identifiable details requested	75	63	85	75	
Other personal information requested	5	2	10	2	
Site has a privacy policy	61	52	66	62	

Type of service	General advice	Recommend ition
	%	%
Personally-identifiable details requested	56	79
Other personal information requested	6	5
Site has a privacy policy	54.5	62

The most common statement was that content and advertising interests were completely separate (58%).

# 5.11 Privacy and personal information

As we used each site, our researchers noted whether they were required to provide personal information, and at what point or points. They also recorded whether the information requested could be used to identify and contact them personally (for example, name, address, insurance number or phone number), or whether it was demographic but not linked to them individually (for example, postal or zip code, or income level). Sites should not collect information, especially personally identifiable information, unless it is necessary for them to do so. If they do collect information, they should ensure they have practices in places to maintain the privacy and security of this data.

We found that in over a third (36%) of cases, sites collected personally identifiable data from users when it was not necessary – that is, users were not making a purchase or signing up for a service, but simply gathering information, so there was no need for their personal identity to be divulged. Finance sites were most likely to collect such data when it was not necessary (49%), followed by deal finder (33%) and health sites (25%).

Sites should allow anonymous browsing and collect personal data only when it is necessary for the service or information being provided.

Sites that collect personal data from users should also provide a privacy policy, explaining clearly what is done with that data. Only 61% of the sites in our study that collected personal data had a privacy policy, clearly labelled as such for the consumer. Finance sites were most likely to have one (66%), followed by price comparison (62%) and health sites (52%). In the majority of cases (87%) these privacy policies were easy to find. An additional small number of sites (35 in total) did not have a clearly-labelled privacy policy, but did give information to consumers about how their data was collected and used, within sections such as 'Terms and conditions', 'Legal information' or 'About us'.

Within these privacy policies, sites were most likely to tell users what is done with their information (for example, sharing or selling it), and what information is gathered and stored. They were less likely to tell users what choices they had about the use of their data (for example, opting out of mailings), and what opportunities they have to check and amend data held on them.

# **Appendix 1:** participants

#### Australia

#### Australian Consumers' Association (ACA)

57 Carrington Road Marrickville NSW 2204

Australia

Tel: +61 29 577 3333 Fax: +61 29 577 3377

Email: ausconsumer@choice.com.au

Website: www.sofcom.au Christopher Ruggles

#### Belgium

#### Association des Consummateurs/ Verbruikersunie (VU)

**Test Achats** 

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1060 Brussels Belgium

Tel: +32 2 542 3211 Fax: +32 2 542 3505

E-mail: abonnement@test-achats.be

Website: www.test-achats.be

Pierre Delefortrie and Françoise Domont-Naert

#### Canada

#### Union des Consommateurs

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Bureau 300

Montréal

Quebec H2L 3K5

Canada

Tel:+1 514 521 6820 Fax:+1 514 521 0736

E-mail: union@consommateur.qc.ca Website: www.consommateur.qc.ca/union Jean Sebastien and Nathalie St. Pierre

#### Denmark

#### Forbrugerrådet

Danish Consumer Council

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Denmark

Tel: +45 77 41 77 41 Fax: +45 77 41 77 42 E-mail: fbr@fbr.dk Website: www.fbr.dk

Anette Høyrup and Søren Buhl

#### **France**

#### **UFC-Que Choisir**

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E-mail: movement@quechoisir.org Website: www.quechoisir.org Odile Nicolas-Etienne

#### Germany

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10969 Berlin

Tel.: +49 30 25800-0 Fax: +49 30 25800-518 E-mail: info@vzbv.de Website: www.vzbv.de

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#### **Hong Kong**

#### Hong Kong Consumer Council (HKCC)

GPO Box 191 North Point Hong Kong China

Tel: +852 2856 3113 Fax: +852 2856 3611

E-mail: cc@consumer.org.hk Website: www.consumer.org.hk Wing Kai Chan and Nancy Kwok

#### Italy

#### Altroconsumo

Associazione Indipendenta di Consumatori

Via Valassina, 22 20159 Milan Italy

Tel: + 39 02 66 8901 Fax: + 39 02 66 8900

E-mail: cca@altroconsumo.it Website: www.altroconsumo.it

Benedetta De Michelis

#### The Netherlands

#### Consumentenbond

Enthovenplein 1 P.O. Box 1000

2500 BA The Hague The Netherlands Tel: +31 70 445 45 45

Fax: +31 70 445 45 90

E-mail: klantenservice@consumentenbond.nl

Website: www.consumentenbond.nl Perry Perfors and Piet van Rosse

#### **Portugal**

### Associação Portuguesa Para A Defensa Do Consumidor (DECO)

Rua de Artilharia Um, No. 79-4

1269 –160 Lisboa Tel: + 21 371 02 00 Fax: + 21 371 02 99

E-mail: deco.deac@ip.pt Website: www.deco/proteste.pt

Mardarida Moura, Joacquim Pimentel and

Nuno Ameixial

#### **Spain**

#### Organización de Consumidores y Usarios

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#### **United Kingdom**

#### Consumers' Association (CA)

2 Marylebone Road London NW1 4DF

UK

Tel: +44 20 7770 7000 Fax: +44 20 7770 7600 E-mail: which@which.net Website: www.which.net Allan Williams

#### **National Consumer Council (NCC)**

20 Grosvenor Gardens London SW1W 0DH

UK

Tel: +44 20 7730 3469 Fax: +44 20 7730 0191 E-mail: info@ncc.org.uk Web site: www.ncc.org.uk

Alison Hopkins and Steve Brooker

#### **United States of America**

# American Council on Consumer Interests (ACCI)

415 South Duff, Suite C Ames, IA 50010

**USA** 

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E-mail: robert.mayer@fcs.utah.edu Website: http://consumerinterests.org

Robert Mayer

#### Consumer WebWatch

A project of Consumers Union 101 Truman Avenue Yonkers, NY 10703-1057

USA

Tel: +1 914 378 2600 Fax: + 1 914 378 2912

E-mail: consumerwebwatch@cu.consumer.org

Website: www.consumerwebwatch.org Beau Brendler and Leslie Marable

# **Appendix 2:** questionnaire

1.	Time assessment started – hour and minute (24 hour clock)	7.	And was this address easy to find? (see guidance notes for definition)  ☐ Yes ☐ No ☐ DK/NS
2.	Type of site (tick one only):		
	☐ Health	8.	Does the site provide the following: (tick
	☐ Finance		all that apply)
	☐ Shopping site (other than health and		☐ An address clearly labelled for customer
	finance)		contact
			☐ An email address clearly labelled for
3.	Scenario used		customer contact, or an email dialogue
	☐ I want to find out about breast cancer		box or other electronic form where the
	☐ I want to find out about prostate cancer		address is clearly visible
	☐ I want to compare mortgages		☐ A phone number
	☐ I want to compare life insurance		•
	☐ I want to find prices for a computer	9.	What information does the site give about
	☐ I want to find prices for a flight from A		ownership? (tick one only)
	to B		☐ Site is privately owned
	☐ I want to find prices for car rental in X		☐ Site is owned by another organisation
	country		☐ Unclear who the site is owned by
			☐ Other (please explain)
4.	How did you find the site (tick one only):		
	☐ Through a search engine, portal or	10.	What sort of information does the site
	index page		provide (tick one only):
	☐ Referral/recommendation (eg from		☐ General information and advice <b>only</b> , ie
	family, friends, colleagues etc) go to Q6		no mention of specific brands
	☐ News or magazine article, TV, radio etc		☐ Site recommends/lists/links to specific
	go to Q6		products or brands, but only in a uniform
	☐ Personal experience/ prior knowledge		or impersonal way, ie these are not recom-
	go to Q6		mendations based on your own personal
	q Other		information
			☐ Site recommends brands/products
5.	If a search engine, portal or index page		based on your own personal information
	was used that required a search term,		(eg a health site recommends a specific
	please write down, in English, the full		drug for your individual condition; a
	search question, search term(s), key		finance site recommends certain
	word(s) or label used:		mortgages based on your situation; a
			shopping site lists prices for a computer or
6.	Does the site provide its own geographic		an air fare based on your requirements)
	address? $\square$ Yes $\square$ No (if no go to O8)		□ Not sure /don't know

☐ Other (please describe)

11. Is there any specific claim about the service the site is offering to the user? (tick all that apply)  ☐ Yes, there's a specific claim – please print off the claim and attach (clearly labelled with your name and URL of site) ☐ Yes, there's a vague or general claim – please print off the claim and attach (clearly labelled with your name and URL of site) ☐ There's no claim ☐ DK/NS	17. How would you describe that statement?  (Tick one only)  □ Specific, site states that it covers the whole market  □ Specific, site states that it covers a certain section of the market and it's clear what that section is (eg proportion of market or companies covered, geographic coverage, list of companies provided)  □ No specific statement made but it's clear from the context what the market coverage is eg list of companies given  □ Vague (please print off the statement
12. Is there any guarantee offered by the site?  ☐ Yes, there's a clear and specific guarantee	and attach, and explain here why you think it's vague)
<ul><li>☐ Yes, there's a vague or general guarantee</li><li>☐ No, there's no mention of a guarantee</li><li>☐ DK/NS</li></ul>	18. For sites that provide a list of products or prices for the user, is there a choice offered to the user BEFORE results are shown about the way in which results are
13. Was any statement made by the site about taking OR disclaiming responsibility for its information or advice?  ☐ Yes ☐ No (if no go to Q15) ☐ DK/NS	presented? ☐ Yes ☐ No (go to Q20) ☐ Not applicable to this site as the site does not present lists of products/prices
<ul><li>14. If yes, which of the following applies (tick one only)</li><li>□ Site disclaimed responsibility for its</li></ul>	(go to Q21) □ DK/NS
advice or information  Site took limited responsibility for its advice or information (please print off statement and attach, clearly labelled with your name and site URL)  Site took full responsibility for its advice and information (please print off statement and attach, clearly labelled with your name and site URL)	19. If yes, what choices for ranking the results are offered?  ☐ Sorted by price/total cost/rate ☐ Alphabetical order ☐ Some other choice (please specify here) ☐ Unclear what choices were offered ☐ DK/NS Now go to Q21
☐ Other (please explain)	20. If you answered NO to Q18, how is the list of products initially (or by default)
<ul> <li>15. Does the site make any statement about market coverage?</li> <li>□ Yes □ No (if no go to Q18) □ DK/NS</li> <li>□ not applicable to this site (go to Q18)</li> </ul>	ranked?  Sorted by price/total cost/rate  Alphabetical order  Some other clear basis (please specify here)
<ul><li>16. Was the statement easy to find? (see guidance notes for definition)</li><li>□ Yes □ No □ DK/NS</li></ul>	<ul><li>□ Basis for ranking unclear</li><li>□ DK/NS</li></ul>
•	21. Does the site give any information at all about its overall currency (how up to date it is)? ☐ Yes ☐ No ☐ DK/NS

	Does it give any information about how up to date the CONTENT is?  ☐ Yes ☐ No (if no, go to Q24) ☐ DK/NS  If yes, which of the following applies: (tick one only)		identity and credentials of individuals  ☐ Partial information given about individuals (eg identity but not credentials)  ☐ Information given in a general way, for the site itself or for parent company, but
	☐ Statement is specific – states frequency		not about individuals providing advice
	of content updates (eg hourly, daily, weekly)		☐ Don't know/not sure ☐ Other (please write in)
	☐ Statement is specific – states date(s)		- Other (preuse write it)
	when content was last updated	29.	Was any warning or statement made by
	☐ Statement is vague		the site about the appropriate use of its
	☐ Other (please explain and state whether		service?
	it's specific or vague)		☐ Yes ☐ No (if no go to Q31) ☐ DK/NS
24.	Does the site provide a specific source, or	30.	If yes, which of the following applies:
	multiple sources, for its information or		(tick all that apply)
	advice? (Tick all that apply)		☐ Site states that its information/advice
	☐ Yes, gives source for advice		should only be used in conjunction with a
	☐ Yes, gives source for data (eg prices)		consultation with a person (eg doctor,
	□ No (If no go to Q27) □ Not applicable to this site		financial adviser)  □ Site states that its information/advice is
	□ Not applicable to this site □ DK/NS		limited to one country or one region
			☐ Site states that its information/advice is
25.	If yes, which of the following applies: (tick		limited in its currency
	one only)		☐ Other (please write in)
	☐ Source provided for <i>all</i> relevant		
	information and advice	31.	Does the site say anything about the
	□ Source provided for <i>most</i> relevant of the		presence or absence of business
	information and advice		relationships (eg owners, partners,
	☐ Source provided for some material but not most		affiliates, payments for placements etc <b>but NOT advertisers as we deal with these</b>
	□ Other		separately below) that could potentially
	☐ Don't know/not sure		influence the impartiality of the
	,		information or advice provided?
26.	Were hyperlinks provided to the source?		☐ Yes
	☐ Yes, always		☐ No (go to Q34)
	☐ Yes, most times		☐ Don't know/not sure (go to Q34)
	☐ Yes, sometimes		
	□ No	32.	If yes, where did you find the statement?
	☐ Don't know/not sure		☐ Under a heading clearly intended for
27	Did the site give any information about		Consumers  D. Under a heading clearly intended for
27.	the authority/credentials of individuals		☐ Under a heading clearly intended for business users
	providing the information or advice?		☐ Under headings for both consumers and
	☐ Yes, all of the time		business users
	☐ Yes, some of the time		☐ Other (please write in here where you
	$\square$ No, never or almost never		found it)
	☐ Not applicable to this site (go to Q29)		
	☐ Don't know/not sure	33.	If yes to Q31, what does it say? (tick one
•	717 · 1 · 6 · 6 · 1 · · · · · · · · · · · ·		only)
28.	Which of the following generally applies:		☐ Site has no commercial interests so
	(tick one only) ☐ Full information given about the		content is impartial  Site states that content and commercial
	- 1 am milotimation given about the		- one states that content and commercial

	where I indicated that I wanted to go
☐ Site states that there is some relationship	ahead a make a purchase
between content and commercial interests	☐ Yes, but not personally identifiable data
(please print off and attach statement,	(eg post/zip code, income level but
clearly labelled with your name and site	without name etc)
URL)	☐ No, the user was not asked to give
☐ Other (please explain)	personal information on this site (please go
- Cuter (pieuse explain)	to end and record time assessment
34. If you answered NO or don't know to Q31,	finished)
•	intistied)
can you tell if there seems to be any	20. December 21. Leave a major and 11
commercial influence on the site content	39. Does the site have a privacy policy?
(eg the way the site present information or	☐ Yes ☐ No (if no go to Q42) ☐ DK/NS
ranks products)?	40 747 41 4 4 6 10 4
☐ There <b>does</b> seem to be some commercial	40. Was the privacy policy easy to find? (see
influence (please explain in space below	guidance notes for definition)
this question)	☐ Yes ☐ No ☐ DK/NS
☐ There does <b>not</b> seem to be any	
commercial influence	41. Were the following included in the privacy
□ DK/NS	policy: (tick all that apply)
☐ Not applicable to this site	☐ What information is gathered from the
	user
35. Does the site contain any advertising,	☐ What is done with that information (eg
including banner adverts and unsolicited	sharing or sale of information to affiliates
links to commercial sites?	or third parties)
☐ Yes ☐ No (if no go to Q38) ☐ DK/NS	☐ What choices users have (eg opting out
	of mailings, disabling cookie tracking)
36. Does the site make any specific statement	☐ What access users have (to see what
about the relationship between its content	information is held and amend)
and its advertisers?	☐ How security of data is maintained
☐ Yes ☐ No (if no go to Q38) ☐ DK/NS	☐ Now go to end and record time
= 165 = 140 (if 110 go to 200) = 211/110	assessment finished
37. If yes, what does it say? (tick one only)	ussessment innorted
☐ Site takes no advertising so content is	42. If there was no privacy policy, were the
impartial	key aspects of privacy listed in Q41
-	contained elsewhere but not actually called
☐ Site states that content and advertising	•
interests are completely separate	a privacy policy?
☐ Site states that there is some relationship	☐ Yes ☐ No (if no go to end and record
between content and advertising interests	time assessment finished) $\Box$ DK/NS
(please print off and attach statement,	40.16
clearly labelled with your name and site	43. If yes, where were they located (tick all
URL)	that apply)
☐ Other (please explain)	☐ Terms and conditions, Terms of use or
	Legal information page
38. During your use of the site, did you notice	☐ FAQs page
any opportunities or requirements for	☐ About Us or About the Site page
users to enter personal information?	☐ Other (please write in name of page)
(please tick one only):	
Yes, including personally identifiable	Time assessment ended – hour and minute
data (ie name, address, phone, insurance	(24 hour clock):
number, email) but only at the point when	
I wanted to go ahead a make a purchase	
☐ Yes, including personally identifiable	
data (ie name, address, phone, insurance	

number, email) before I got to the point

# Appendix 3: websites used

The website names listed here were correct at the time of the study (April to July 2002). However some may have changed or closed down since then.

#### **Australia**

www.airfairs.com.au www.au.lastminute.com www.buyguide.com.au www.cannex.com.au www.dietclub.com.au www.echoice.com.au www.emedical.com www.flightcentre.com.au www.fodors.com www.futuresafe.com.au www.gatewaytravel.com.au www.healingwithnutrition.com www.healthanswers.telstra.com www.homeloansnow.au www.homepath.com.au www.infochoice.com.au www.insurancewatch.com.au www.interestrate.com.au http://lifestyle.ninemsn.com.au/goodmedicine/ www.liquid.co.nz www.loannet.com.au www.loseweightnow.com www.moneymanager.com.au www.mortgageaustralia.com.au www.rightloan.com.au www.travel.com.au www.travelbook.com.au www.travelcity.com www.traveltickets.com.au www.webtravel.com.au

#### Belgium

www.abcourtier.be www.airstop.be www.amadeus.net www.arbalet.com www.assurfinance.com www.assurteam.com www.assurweb.be www.bancompare.com www.buyit.be www.cepiac.be www.connections.be www.defa.be www.degriftour www.dinafinance.com www.dvdpascher.net www.eccent.be www.emprunt.be www.hypocent.com www.lemoniteurautomobile.be www.leningoline.be www.meilleurtaux.be www.officeduprethypothecaire.be www.shopping.be www.speed.be www.ticketbbltravel.be www.travelprice.be www.travelstreet.be www.vdvconseil.be www.viptravel.be www.zone-dvd.com

#### Canada

www.abcvoyages.com www.accesdirect.com www.activebuyersguide.com www.aqaa.qc.ca www.ask.com www.assurancedirect.ca www.assurancexactaux.com www.buybuddy.sympatico.ca www.ca.travel.yahoo.com www.canada.etrade.com www.caringforkids.cps.ca www.cimbl.ca www.expedia.ca www.feelbest.com www.healthatoz.com www.jefixe.com www.kanetix.com www.lung.ca www.mediresource.canoe.ca www.mediresource.com www.money.msn.ca

www.moneysense.ca www.mortgagecentre.com www.mysimon.com www.pages.cinet.net www.pages.infinit.net www.reiqcs.org www.shopper.cnet.com www.shopping.mybc.com www.temporaireplus.com

#### Denmark

www.bestpriceeu.com/dk www.alternativinfo.dk www.consumerdesk.dk www.cure4vou.dk www.dabbadoo.dk www.dit-apotek.dk www.doktoronline.dk www.drekkert.dk www.edbpriser.dk www.hvidevarepriser.dk www.iform.dk www.infomarked.dk www.kelkoo.com www.linkmedica.dk www.madogsundhed.dk www.medicinmedfornuft.dk www.mobilpriser.dk www.netdoktor.dk www.netnaturdoktoren.dk www.netpatient.dk www.nomedica.dk www.patientnet.dk www.pricerunner.com www.sundhed.dk www.sundhedsguiden.dk www.sundhedsinformation.dk www.telepriser.dk www.vitamindoktor.com/dk www.vitaviva.com www.webdoktor.dk

#### **France**

www.33docavenue.com www.acheter-moins-cher.com www.airfrance.fr www.allergienet.com www.allergie-recettes.com www.axa.fr www.buycentral.fr www.comparerlesprix.fr www.csante.com www.cvotresante.com www.doctissimo.fr www.doctuerinfo.com www.e-sante.fr www.esculape.com www.generique.net www.gyneweb.fr www.hardware.fr www.hertz.fr

www.kelkoo.com www.leguide.com www.lejournalsante.com www.medecine-et-sante.com www.mediamed.online.fr www.notredocteur.com www.opodo.fr www.partirpascher.com www.pathol08.com www.pratique.fr/sante/ www.primadoctor.com www.promedical.net www.sante.egora.fr www.santeweb.com www.tamaloo.com www.toobo.fr www.travelprice.fr www.urolink.fr www.veille-pharmaceutique.com

#### Germany

www.33max.de www.ac-services.de www.airline-direct.de www.airlinetickets.de www.allergate.de www.allergie-info.de www.angebotsvergleich-immobilien.de www.apotheke.de www.aspect-online.de www.baugeldvergleich.de www.billigflug.de www.einsurance.de www.finanzradar.de www.gesundheit-aktuell.de www.holidayautos.de www.hypothekendiscount.de www.interhyp.de www.kostenlose-mietwagen.de www.krebsinformation.de www.lebensversicherung-versicherungsvergleich.de www.leihautos.de www.lifeline.de www.medizinfo.de www.medizin-forum.de www.megavitalshop.de www.meinegesundheit.de www.opodo.de www.qualimedic.de www.topscout24.de www.travelchannel.de www.travelinfo.de www.travel-overland.de www.versicherung.de

#### **Hong Kong**

www.852001.com www.999.com.cn www.admortgage.com www.aerohkg.com www.airticket.com.hk

www.asia-hotels.com www.ccpc.com.tw www.easterntour.com www.ebao.com www.favmui.com www.flyfu.com.hk www.fortress.com.hk www.globalrentalcar.com.tw www.healthskv.com http://hk.dollardex.com www.hkcomputermall.com www.hkgolden.com www.home-appliance.com.hk www.imed21.com www.insurance.com.hk www.insurancestreet.net www.kwiksure.com www.lc-insurance.com.hk www.lotus-tours.com www.pioneer-travel.com www.speedinsure.com www.trinity.com.hk www.vhouse.com.hk www.wedar.com www.yung-sing.com.tw

#### **Italy**

www.benessere.com www.bigliettiaerei.it www.brokeronline.it www.buycentral.com www.costameno.it www.creditway.com www.dica33.it www.donnamed.it www.edreams.it www.eviaggi.com www.farmacia.it www.freefinance.it www.fulcron.com www.getmoney.it www.gooru.com www.icompare.it www.inrotta.it www.it.kelkoo.com www.mffamily.it www.miaeconomia.it www.mutuionline.it www.mutuipoint.it www.mybestlife.com www.piazzasalute.it www.prezzi-online.it www.risparmio-assicurazioni.it www.salus.it www.salutedonna.it www.travelconsult.it www.travelprice.com

#### The Netherlands

www.4-cheap-car-rentals.com www.allergietest.nl www.autohuurpagina.nl

www.dealtime.com www.dehypotheker.nl www.dokter.nl www.drogistentips.net www.elcheapo.nl www.geencentteveel.nl www.geldshop.nl www.gezondheidsplein.nl www.holidayautos.nl www.holidaycars.nl www.ikhaatfinancieleplanning.net www.independe.nl www.kijkenvergelijk.nl www.levenplein.nl www.miepkniep.nl www.moneyou.nl www.mrfinch.nl www.nl.kelkoo.com www.prijspagina.nl www.productverglijk.nl www.prostaat.nl www.rug-klachten.info www.scherpeprijzen.nl www.tickettracker.nl www.verzekerjegoedkoop.nl www.vliegwinkel.nl www.wellowell.nl

#### **Portugal**

www.crediglobal.pt
www.farmaciasaude.com
www.investidorglobal.com
www.investirseguro.pt
www.mni.pt
www.onbolsa.com
www.roche.pt
http://saude.sapo.pt
www.vivasaudavel.pt
www.webcare.pt

#### **Spain**

www.abctusalud.com www.aero.es www.alergiasmatic.com www.bancaonline.patagon.es www.buscamed.com www.buscatuhipoteca.com www.canalsalud.com www.ccm.es www.elmedico.net www.elmundosalud.elmundo.es www.e-medicum.com www.fefoc.org www.hipoteccasenlaweb.es www.inmopolis.com www.invertia.com www.lacasadelalergico.com www.lainmobilaria.com www.medicinainternet.com www.msc.es www.oncologia2000.com www.salud.discoveryespanol.com www.salud.medicinatv.com www.saludalia.com www.saludclick.com www.todohipoteca.com www.tuhipoteca.com www.tuotromedico.com www.tusalud.com www.webdelamior.com www.winterthur.es

#### **United Kingdom**

ww2.farefinder.co.uk www.1uphealth.com www.1uptravel.com www.abcaz.com www.adviceonline.co.uk www.all-inclusive-car-rental.co.uk www.bargains.co.uk www.bargainseurope.com www.bestbuy-mortgage.co.uk www.blays.co.uk www.bnm.com www.bonaportlife.co.uk www.cancerbacup.org.uk www.cancernet.co.uk www.carhire4less.co.uk www.charcol-online.co.uk www.cheapflights.co.uk www.computerprices.co.uk www.dealtime.co.uk www.easy-quote.co.uk www.easyvalue.com www.ebookers.com www.expedia.co.uk www.fish4.co.uk www.flightfind.co.uk www.globcars.com www.grabaflight.com www.just-mortgages.co.uk www.loanz.co.uk www.majortravel.co.uk

www.med4u.co.uk www.medicdirect.co.uk www.mens-care.org www.menshealthforum.org.uk

www.moneyextra.com www.moneyfacts.co.uk www.moneyguest.co.uk www.moneynet.co.uk

www.moneysupermarket.com www.mortgageandloangroup.co.uk www.mortgage-uk-mortgage.co.uk

www.netdoctor.co.uk www.opodo.co.uk www.price-guide.co.uk www.pricewatch.co.uk www.prostate.org

www.prostate-cancer.org.uk www.rentacar-europe.com www.skydeals.co.uk

www.telmeglobaltraveller.com

www.travelbag.co.uk

www.travelocitv.co.uk www.travelselect.com http://uk.kelkoo.com http://uk.pricerunner.com http://uk.shopsmart.com www.ukmortgagesonline.com www.ustoo.com www.zdnet.co.uk

#### **United States**

www.123termlifeinsurance.com www.1800lifeinsurace.com www.1stquote.com www.4freequotes.com www.800allergy.com www.accuquote.com www.accuterm.net www.allquotesinsurance.com www.americaquote.com www.answerfinancial.com www.awnow.com www.bankrate.com www.bizrate.com

www.bnm.com www.breastfeeding.com www.cancerdirect.com www.cancerlinksusa.com www.charteronedirect.com

www.cnet.com

www.computerinsurance.com www.cwinsurance.com www.dartloan.com www.dealtime.com www.ditech.com www.doigualify.com www.drkoop.com www.ebix.com

www.eheaven.com/federalequity

www.epinions.com www.expedia.com www.healingedge.net www.ibuyernet.com www.iinsurancequotes.com www.insurance.com www.insuranceselect.com www.insureone.com www.insurerate.com www.insweb.com

www.interestratesonline.com www.lenderscompete.com www.lendingtree.com www.loanweb.com www.lowermybills.com www.lowestmortgage.com www.merck-medco.com www.mortgageexpo.com www.netquote.com www.nextag.com www.onetravel.com www.peanutallergy.com www.personalmd.com www.termmaster.com

www.tigerquote.com www.traveljam.com www.travelnow.com www.travelselect.com www.webmd.com www.youngagain.com www.yourlowestrate.com www.pollen.com www.price.com www.pricegrabber.com www.pricescan.com www.prostate health directory.comwww.qoutesmith.com www.quickquote.com www.quotetermlife.com www.rcog.net www.reliaquote.com www.selectquote.com www.sky-tours.com www.stopsneezin.com www.streetprices.com www.summitlending.com www.term.com www.term4sale.com www.youdecide.com

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Web site: http://www.consumersinternational.org



#### **About Consumers International**

Founded in 1960, Consumers International (a non-profit organisation registered in The Netherlands as the International Organisation of Consumer Unions, registration number S1 49999) is a federation of consumer organisations dedicated to the protection and promotion of consumers' interests worldwide through institution building, education, research and lobbying of international decision-making bodies. An independent, non-profit foundation, Consumers International has more than 260 members in almost 120 countries.

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Latin America and the Caribbean, Casilla 9635, Santiago, Chile
Tel: +56 2 335 1695 Fax: +56 2 231 0703 e-mail: consint@consint.cl
Africa, Private Bag A6215, Avondale, Harare, Zimbabwe