

CMA Digital Comparison Tools (DCT) Mystery Shopping and Websweep Research Report

Conducted as part of the Digital Comparison Tools (DCT) market study

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1 Executive Summary

- In September 2016, the Competition and Markets Authority (CMA) launched a Market Study of Digital Comparison Tools (DCTs) with the aim of producing an authoritative assessment of the role of DCTs, including an assessment of the benefits they offer and of concerns that have been raised about them.
- As part of this study, the CMA commissioned GfK to conduct an online mystery shopping exercise. The CMA also conducted an internal websweep exercise across a range of DCT websites and apps to review their content. This report provides an overview of the results from both the mystery shopping and the websweep.

The research

- 3. The websweep involved an assessment of 35 DCTs (including some apps) where reviewers identified the information they could find about DCTs themselves when looking at their sites. This included information on their ownership, market coverage, business model, ranking and rating methodologies, claims about what savings consumers can make, their use of personal data and what consumers can do if things go wrong. The aim of this research was to give a high-level indication and general picture of what information appeared to the reviewers to be available on a range of DCTs rather than to provide detailed site assessments, or to assess whether or not sites were accurate in their descriptions of their services or complying with any relevant regulatory requirements.
- 4. The mystery shopping involved an assessment of 56 DCTs (some of which were covered by the websweep exercise as well) across seven industry sectors. The aim was to understand the actual consumer journey from the point when consumers' information and requirements were requested by DCTs to the presentation of results and the purchase journey that followed. This exercise assessed also what happened when follow-up revisits were undertaken.
- 5. The mystery shopping was a complex assessment which raised a number of reporting issues. For example, in some instances the DCT itself presented results that were open to interpretation and in others, although most assessments reported the same finding, one or more indicated a different one. In these instances, when the analysis of screenshots revealed what was most probably the most accurate answer, the analysis was adjusted to reflect it. However, as explained in detail in the report, this was not always possible. For these reasons, there are a number of caveats to be aware of when looking at the results of this research. However, despite these caveats, there are some key results and trends, both within sectors and across sectors, that emerge from this research.
- 6. The report, like the assessments, is based around the consumer journey, from the information available about DCTs on their sites to input of consumer information to the presentation of results on DCTs and the presentation of specific providers' quotes.

What DCTs say about the services they provide (Websweep)

- 7. The websweep found that DCTs vary considerably in the range and type of information they provide on their sites about their nature and the services they provide to users; although the broad structure of the sites were largely consistent. For example, all sites included a Terms and Conditions and Privacy Policy page; and only two did not have an About Us page.
- 8. All DCT websites/apps that were assessed appeared to include information about their use of consumer data, as well as contact details and information relating to ownership / affiliation (with the exception of one site). Other information was less frequently found for instance on business models and complaints



procedures. There were also differences noted between sectors, with DCTs in the travel sector appearing less likely to provide information on their business models and about complaints procedures, whilst DCTs in the broadband and telecoms sectors appeared more likely to provide general information about the suppliers of the product / service (e.g. how checks are made).

- 9. There were also differences in the information provided by sites covering different sectors in relation to factors such as market coverage, pricing and ranking. However, across most sectors, relatively few sites appeared to explain their policies on keeping offers up-to-date, or their methods for ranking offers. Many sites, especially for flights and broadband, also did not appear to explain their market coverage.
- 10. In terms of explaining their business model, there were differences in DCTs' provision of information relating to their revenue sources; with 13 of the 35 DCTs appearing not to mention this. Twelve of the DCTs appeared to say whether or not financial arrangements with suppliers could influence how results are presented (e.g. ranking, prominence, size of text).
- 11. All DCTs provided some information about the use of consumer data, although there were differences on the extent of that information including the use of Personal Identifiable Information (PII) and non-PII. In particular, most sites appeared to say that they would, or might, share such data with third parties, although many did not appear to explain with whom they would share it. Most appeared to offer some form of control over whether the DCT could contact the consumer in the future for marketing purposes (usually as an opt-out and described in Privacy Polices or Terms and Conditions), but about half did not appear to offer information about whether third parties could contact the consumer for marketing purposes.
- 12. Of the 35 DCTs reviewed, 22 appeared to provide information on how to complain to them about problems in connection with the comparison itself and 16 appeared to include information about what a consumer could do if unsatisfied with the response to a complaint.

Consumer information requested by DCTs (Mystery shopping)

- 13. The results of the mystery shopping indicated that the type of information requested from consumers varied substantially across sectors, reflecting the nature of the services involved. Although within each sector there was a high level of similarity between DCTs in terms of the information requested, even within some sectors, there was some variation across comparison sites.
- 14. In the insurance sector DCTs requested a comparatively high volume of personal and financial information, including factors relating to the person (or people) and the item (or items) being insured (e.g. a car or a house). The energy sector also requested a relatively high volume of information, again due to the need to generate results based on a number of factors such as usage, energy supply etc.
- 15. Less information in general was requested by DCTs in the credit card and broadband sectors. However, whilst most DCTs in the credit card sector requested personal information (e.g. name, date of birth, address), the majority of DCTs in broadband only requested postcode to generate quotes. The information requested by DCTs in the hotels and flights sectors was very much based around the consumer's travel requirements, including destinations and timings, rather than any personal information.



Presentation of results by DCTs (Mystery shopping)

- 16. A key part of the mystery shopping exercise was to answer the following research questions:
 - What product dimension information is provided?
 - · What is the default ordering of results?
 - Is it possible for consumers to filter and re-order the results?
 - Is an explanation of technical terms provided?
 - Do DCTs display advertising?
 - Are results consistent with the search criteria?
- 17. Overall, we found that DCTs presented information in similar way, within the same sector, regardless of the enquiry type. However, the research highlighted that, in some cases, different consumers may see slightly different information (presented in different ways) using the same DCT. This reflected a number of factors, such as:
 - The providers themselves may display different information for example, one provider of home insurance may show 'monthly premium', whilst another provider on the same results page may not.
 - Advertising and sponsored results may impact on ordering and how results are displayed.
 - Differences in the information provided by consumers can affect how the results are ranked /ordered and in some cases, particularly credit cards, different filters can change the ordering of variables.
- 18. The majority of DCTs in the insurance sectors displayed the same information (e.g. premium, payment terms, additional policy cover) and generally used a default ranking based on a measure of price (e.g. monthly or annual premium). There were differences, however, in the ability of shoppers to either filter or re-order their results, meaning that changing the ranking to tailor to a consumer's needs was easier on some DCTs than others.
- 19. In the energy sector the level of information shown on DCT results pages was also similar across DCTs with some measurement of price (e.g. estimated level of saving, yearly bill) also commonly used as a default ranking. Also, whilst every DCT in this sector allowed filtering (all including payment option filters) no DCT allowed re-ordering.
- 20. DCTs in the hotels and flight sectors were similar in that the information displayed on results pages varied little across all DCTs (e.g. price, dates and ratings in the case of hotels). However, whilst DCTs in the flights sector consistently ranked the results by price, default ranking by recommendation (or similar factors) was much more prevalent within the hotels sector. Also, the majority of DCTs in these sectors allowed filtering and re-ordering across a range of factors.
- 21. DCTs in the credit card sector were less consistent in the display of results pages. Whilst the information provided was largely the same across DCTs (e.g. representative APR, balance transfer offer), there were considerable differences in terms of how the results were ranked and, whilst the majority of DCTs allowed re-ordering, filtering or both, the variables used differed between DCTs.
- 22. Explanations of technical terms were more likely to be observed in the insurance, broadband and credit card sectors, with the use of technical terms less prevalent in the travel sector.
- 23. Incentives, paid-for results and advertising were also observed by shoppers, but only in a minority of assessments across each sector. Advertising and incentives were more commonly used by DCTs in the broadband sector.



- 24. Shoppers were asked to report on whether they were able to find a quote that matched their search criteria. We provided shoppers with a range of different search criteria (ie scenarios) to understand if and how the consumer journey changed. We found that shoppers were more successful in matching their scenarios in the insurance, credit card and energy sectors, and less so in broadband. However, within each sector, the results page did not match the search criteria in a number of assessments. This was the case, when, for example, the shopper was instructed to insert a voluntary excess or to look for a favourable foreign purchase rate on a credit card. In broadband, where the majority of DCTs only requested the consumer's postcode, a comparatively high proportion of scenarios could not be matched as most search criteria (eg a specific speed) could not be specified in the search.
- As part of this exercise, we also assessed which were the most common brands displayed on the DCT result pages and compared them with the largest brands in each sector identified using market shares calculated on the basis on GfK data. Although there are a number of caveats attached to this analysis, as explained in the report, we found that in the insurance sectors the brands that were most often presented on DCTs were likely to be smaller brands in the insurance market. Similarly we found that, in energy, the largest brands in the sector were under-represented on the DCTs assessed. However, the credit card sector showed greater consistency between market share leaders and most commonly shown brands on DCTs results.

Comparison between DCTs and providers (Mystery shopping)

- 26. After the assessment of the result pages, shoppers continued the consumer journey and clicked on some of the providers listed on the result page. The subsequent analysis assessed what the shoppers found on suppliers' sites and how this compared with the information provided by DCTs.
- 27. We found that purchase journey varied significantly between sectors. In credit card and broadband all DCTs redirected shoppers to providers' sites, whereas in hotel and energy most of the times the purchase journey continued directly on the DCTs. Where purchases had to be made on the provider site, shoppers were instructed to assess three different providers (where possible) and compare the results against those on the DCT results page.
- 28. In almost all the assessments in the insurance sectors the providers saved the shopper information entered on the DCT and used it on the provider site. This was the case also in the majority of assessments for flights and hotels. However, in over two thirds of assessments in credit cards, broadband and energy the shopper's details were not saved; and in many cases additional information was required on the provider site.
- 29. A key part of the study was to understand whether quotes changed between the DCT and the provider site. This was measured by comparing individual elements of the offering, including the price (or 'package' in the broadband sector and 'offer' in credit card). Where there were differences, shoppers were instructed to indicate the reasons of such differences, where possible. A detailed analysis of shoppers' screenshots provided further details on these differences.
- 30. The fewest differences in price occurred in the motor insurance sector (with only 2% of assessments showing an apparent price change) and home insurance (with 6% of assessments showing an apparent change in price). Only 1% of assessments in the credit card sector showed a change in the Representative APR, although changes to the 'offer' were also reported (but mainly on DCTs where limited information had been provided on the results page). The number of price changes was higher in



both energy and travel; and shoppers reported that the package changed in a high number of assessments in the broadband sector, for a range of reasons.

Revisits (Mystery shopping)

- 31. Finally, following the initial visits, shoppers were instructed to go back to the DCT (either once or twice according to the sector) and input exactly the same information to assess whether differences occurred, particularly in the presentation of results.
- 32. In the majority of cases across all sectors the results pages remained the same when comparing the first visit and the revisit(s); however, in each sector, there were a small number of examples where the position of the providers on the result page and/or the price of its offer changed.



2 Project Overview

2.1 Background to the research

- 33. In September 2016,¹ the Competition and Markets Authority (CMA) launched a Market Study of Digital Comparison Tools (DCTs)² with the aim of:
 - Producing an authoritative assessment of the role of DCTs for use by all policymakers and other stakeholders – the benefits that they offer and the merits and extent of concerns that have been raised about them.
 - Identifying how to maximise the benefits that DCTs can deliver for example by ensuring that
 consumers have sufficient and well-placed trust in them, or ensuring that regulation is proportionate
 and well-designed.
 - Reducing barriers to the effective functioning of DCTs, such as consumer distrust, or DCTs' access to the data they need in order to offer a compelling service.
- 34. As part of this study, the CMA commissioned GfK to conduct an online mystery shopping exercise. The CMA also conducted an internal websweep exercise across a range of DCT websites and apps to review their content. This report provides an overview of the results from both the mystery shopping and the websweep.
- 35. In March 2017, the CMA published an Update Paper on its progress with the Market Study, which included some emerging findings from the mystery shopping and websweep research.³

2.2 Research themes and questions

- 36. The following five high-level research themes were identified as the key areas for the research:
 - DCTs' transparency on issues such as market coverage, business model and savings claims.
 - Information requested by DCTs from consumers.
 - How the results are presented by DCTs, including variation in offers according to shopper profile; and if and how users can change the presentation of results.
 - How the results / quotes on the DCT compare to those presented by providers.
 - What happens when a consumer re-visits a DCT in terms of how results presented by DCTs change in price and/or other dimension; and how the experience compares to the initial visit.
- 37. Across each of these five high-level themes, a significant number of key research questions were identified. These were explored across the two programme strands introduced above: the websweep and the mystery shopping research.
- 38. The websweep mainly investigated the first key research theme above. In particular, it addressed what information reviewers identified about the DCTs themselves when looking on their sites for instance, in terms their ownership, market coverage, business model, ranking and rating methodologies, claims about

¹ CMA, Market Study of Digital Comparison Tools – Statement of Scope, September 2016.

² The CMA's working definition of DCTs is 'Web-based, app-based or other digital intermediary services used by consumers to compare and/or switch between a range of products or services from a range of businesses'.

³ CMA, <u>Digital comparison tools market study – Update paper</u>, March 2017.



what savings consumers can make, their use of personal data and what consumers can do if things go wrong. Where most relevant, this included an assessment of how easy the information was to find (in terms of 'clicks' from the homepage).

39. The mystery shopping focused on the actual consumer journey, covering the latter four key research themes above. In particular, shoppers were instructed to assess what personal and financial information was requested by DCTs, how the results were presented by DCTs, what purchase journey followed the presentation of results (including how the quotes on the provider site compared to the DCT) and what happened when follow-up revisits were undertaken.

2.3 Websweep

40. The websweep involved an assessment or 'sweep' of 35 DCTs, including two apps. These sites were selected as a combination of some of the most visited DCTs (using Alexa global website rankings) for each of the four case study sectors for the market study⁴ plus energy, as well as some newer and innovative sites – for instance offering concierge services. The DCTs assessed are shown below, with the brand names redacted.

Table 1: DCTs assessed in the websweep.

List of DCTs – Financial Services 16 DCTs	List of DCTs – Travel 16 DCTs	List of DCTs – Utilities 19 DCTs ⁵
DCT	DCT	DCT
		DCT
		DCT
		DCT

⁴ Home insurance, credit cards, flights and broadband.

⁵ Of these 19 DCTs, 12 offered energy services and 17 offered broadband and telecoms services.



- 41. Of the 35 DCTs assessed, 18 did not appear to offer an app; and of those that did, all 17 offered the app on both Google Play and IoS (Apple Store). The reviewers looked at DCT websites only, with the exception of two apps included in the sweep. One of these two apps had no website equivalent. For the other app, provided by a DCT operator in the Travel sector, the sweep reviewed the content on *both* the operator's website and its app. In practice, while there appeared to be small differences in the information (for instance in terms of contact details not being apparent on the app), these were not substantial and the app linked through to the website if users wanted more information. Readers should, however, bear in mind that where our report discusses the websweep of 35 DCTs, and specifically sites in the Travel sector, these numbers *include* an app that largely mirrored one of the DCTs.
- 42. Of the 35 DCTs, 23 covered one sector. Eight DCTs covered two of the three sectors (highlighted in orange), and four DCTs covered all three sectors (highlighted in red).
- 43. The websweep was conducted by four CMA employees (termed 'reviewers' in the section covering the websweep), each of whom looked at DCTs across a range of sectors using a structured questionnaire to collect standardised information about each DCT. The questionnaire was designed by the CMA and completed online as the reviewer looked at each site. The questionnaire was accompanied by guidance on its completion and the CMA reviewers attended a briefing session on how to complete it. To help ensure consistency, the CMA's reviewers conducted spot checks on samples of each other's reviews.
- 44. The questionnaire employed a looped structure to collect comparable information about each of the following website/app pages:
 - Homepage
 - About Us page
 - Terms and Conditions page
 - Privacy Policy page
 - Elsewhere on the website (this was asked about only where key information was not already provided on the main four pages above)
- 45. It should be noted that the aim of this research was to give a high-level indication and general picture of what information appeared to the reviewers to be available on a range of DCTs rather than to provide precise, detailed site assessments. In particular, although reviewers used the same questionnaire and guidance, comparison tools can vary substantially in their complexity and layout as well as how they describe their services, which means that there was always the potential for some evidence to be missed or misinterpreted. It is also important to note that the websweep focused on information provided by DCTs about themselves and their services prior to conducting a search for offers (ie the reviewers did not input data or request offers), and it is therefore possible that in some cases sites may have presented more information about their services when presenting offers than the reviewers recorded. In addition, reviewers intentionally acted as 'informed consumers' i.e. seeking to locate and identify specific information, but also doing so within reasonable timescales (for instance only looking for few minutes for pieces of information). It is important, therefore to note that the sweep and this analysis can provide only an indication of the information present on the sites reviewed. For this reason, the analysis frequently makes clear that it reflects what information appeared to the reviewers to be on the sites they reviewed.
- 46. Furthermore, where we report whether or not information was apparently present, or on the details of the information identified on the sites reviewed, this should not be considered an assessment of whether or not the sites were accurate in their descriptions of their services, nor whether they were complying with any relevant regulatory requirements. The exercise was not intended to review sites' compliance and reviewers did not seek to assess whether particular information should or should not have been present.



47. Finally, the sweep necessarily focused on a comparatively small number of DCTs (including some of the larger ones). There are hundreds of DCTs consumers can use, including many smaller ones, so care should be taken in generalising from our high-level findings.

2.4 Mystery Shopping⁶

- 48. The mystery shopping involved an assessment of 56 DCTs (covering both websites and apps, across seven industry sectors including home insurance (HI), motor insurance (MI), credit cards (CC), flights (F), hotels (H), energy (E) and broadband (BB). As with the websweep, the DCTs were selected on the basis of being some of the most visited according to Alexa global website rankings and are listed below.
- 49. In total, 29 DCTs (highlighted in green or orange) were covered in both the websweep and mystery shopping exercises. Of those covered in both the websweep and mystery shopping, those highlighted in orange were assessed in more than one sector.

⁶ This section briefly sets out the methodology of the mystery shopping exercise. More details are available in the Technical Report.



Table 2: DCTs assessed in the mystery shopping.

List of DCTs – Financial Services (23 DCTs)	List of DCTs – Travel (24 DCTs)	List of DCTs – Utilities (18 DCTs)
DCT	DCT	DCT
DCT	DCT	
	DCT	



- 50. For the mystery shop, shoppers were asked to act out a number of example scenario assessments (explained further below). As a result, a total of 478 assessments were undertaken, including 443 website assessments and 35 app assessments.
- 51. The initial aim was to conduct 465 assessments across 7 sectors (see Table 3). The original target was based on two sectors (flights and home insurance) covering 15 DCTs and 6 scenarios per DCT (90 assessments in total per sector); two sectors (broadband and credit cards) covering 15 DCTs and 5 scenarios (75 assessments in total per sector); one sector (hotels) covering 15 DCTs and 3 scenarios (45 assessments in total); a further sector (energy) covering 8 DCTs and 6 scenarios (48 assessments in total) and one final sector (motor insurance) covering 7 DCTs and 6 scenarios (42 assessments in total).
- 52. In mystery shopping it is common practice to include an over-sample to ensure that any non-completed assessments (i.e. those failing quality checks) are covered. Therefore, whilst all DCTs and scenarios were covered across every sector, the final number of assessments undertaken was higher in five sectors (flights, home insurance, broadband, hotels and motor insurance). However, in two sectors (credit cards and energy) the final assessment numbers were slightly lower than originally required due to assessments being excluded from the final sample based on back-end quality checks.
- 53. Shoppers were instructed, where possible, to click on three provider quotes on the results page to assess how the provider quotes compared to the DCT quote. As such, the figures for the 'number of providers' visited represents the number of provider sites assessed by shoppers following the initial visit to the DCT. In the majority of cases shoppers did click through to three providers, but in some cases there were fewer than three quotes available on the results page and so the shopper only clicked through on the one or two quotes available. Some DCTs allowed shoppers to make the purchase via the DCT (i.e. not via a click-through), which was particularly prevalent in certain markets, hence the number of providers visited was lower in the hotels and energy sectors, as below (Table 3). It is also important to note that the figures relating to 'number of providers visited' only relate to the initial visits, as opposed to including any subsequent re-visits. The main reason was that, in the majority of cases, the list of providers was the same following the re-visit.



Table 3: Breakdown of assessment numbers.

Sector	Required number of DCTs to be assessed (number of DCT apps. in brackets)	Number of scenarios	Required number of DCT assessments	Number of DCT assessments completed	Number of providers visited
Flights	15 (5 apps)	6	90	92 (10 apps)	171
Home insurance	15 (3 apps)	6	90	91 (5 apps)	234
Broadband	15 (1 app)	5	75	76 (4 apps)	226
Credit cards	15 (1 app)	5	75	74 (1 app)	207
Hotels	15 (5 apps)	3	45	53 (6 apps)	18
Energy	8 (2 apps)	6	48	47 (6 apps)	33
Motor insurance	7 (2 apps)	6	42	45 (3 apps)	126
Total	90 DCTs (19 apps)	37	465	478 (35 apps)	1,015

- 54. In order to ensure that each assessment was undertaken consistently, mystery shoppers were provided with a set of briefing notes (with detailed instructions on how to undertake the assessment) and a questionnaire to complete. Whilst there were differences in each of these documents depending on the specifics of each sector, the questionnaire (and briefing notes) were kept as consistent as possible to allow for analysis across sectors. All shoppers were instructed to take screenshots throughout their assessments to provide evidence backing-up their answers.
- 55. In essence, shoppers were instructed to undertake the following steps and assess the process:

Step 1 - Each shopper was instructed to follow a specific scenario.

These scenarios were designed by the CMA to reflect a range of realistic examples of likely consumer requirements and circumstances and the type of product / service they required, and were based around providing specific information relating to shoppers' own personal and financial circumstances as required to begin the comparison process. As such, shoppers were specifically recruited to ensure that their real-life circumstances met the requirements of each scenario as closely as possible. The scenarios were tailored for each sector and their number varied by sector: six scenarios for energy, flights, home and motor insurance; five scenarios for credit card and broadband and three scenarios for hotels. The nature of the scenarios by sector is shown in Appendix I. The original aim was to achieve an even number of assessments for each scenario; however due to the over-sample and because certain scenarios were more compatible with a higher number of shopper circumstances (e.g. broadband scenario 1) an exactly equal spread of assessments was not achieved (Appendix II).



Step 2 - Shoppers were then instructed to visit one of the DCTs in the list above, as a normal customer.

Shoppers visited the DCT they were assigned to (either on the DCT's website or app), but were instructed not to assess a DCT they had previously used. They were also instructed to clear their cookies prior to starting the assessment so as to remove traces of their previous search history. They were then asked to start the comparison on a DCT website or app for a specific sector (e.g. home insurance) entering their details, where required, as per their scenario. They were instructed to assess what information was requested by the DCT.

Step 3 - Shoppers were then instructed to go through to the results page.

Once the shoppers had entered the required information, they went through to the results page presented by the DCT and assessed a number of factors including the default order in which the quotes were presented, if and how quotes could be re-ordered, and whether technical terms were explained.

Once the assessment of the results page was complete, shoppers were also told to re-order the quotes (where possible) based on the following:

- Annual premium Home insurance / motor insurance / broadband
- Price (from low to high) Flights / hotels
- Representative APR Credit cards
- Monthly savings Energy

Following the re-ordering (on DCTs where this was possible), shoppers were then asked to choose the quote that was most appealing to them; followed by the top two ranked quotes if not already chosen. For example, if the shopper chose the top ranked quote as his/her preference, he/she would then had to choose the quotes ranked in positions 2 and 3.

Shoppers were then told to either click through to the provider sites for all three quotes (where this was possible) or, for DCTs where the purchase was made on the DCT, shoppers were instructed to follow the process up to the point of purchase. No shopper actually made a purchase or switched provider.

Step 4 – Comparing the information on the provider site with that on the DCT.

The shoppers then compared the quotes on the providers' sites with the DCT's quotes for all three suppliers (where possible). Where shoppers visited DCTs that required the purchase to be made on the DCT itself, and didn't re-direct shoppers to providers' sites, shoppers were asked to compare the final quote of their chosen provider as presented on the DCT – the quote provided just before the point of purchase – with the initial quote presented for the same provider on the DCT (the quote presented after the comparison process was initiated).

The main aim of this element of the assessment was to assess whether there were apparent differences between the provider and the DCT quotes or between the initial and final quote on the DCT. This included recording whether shoppers' personal information previously inserted was saved and if additional information was requested.

Step 5 - The re-visits

Following the initial visit to DCTs and providers, shoppers were then instructed to undertake either one or two revisits on the same day to the same comparison site, according to the sector, using the same scenario as follows:

Revisit 1 (not removing cookies) – All sectors



Revisit 2 (after removing cookies) – Most sectors, aside from credit cards and energy.

The aim of this element of the programme was to assess whether there were apparent differences in the results from the previous visits, including whether this appeared to relate to the retention of data on previous visits in the form of cookies. This included whether the ordering of quotes was different and, for the top 10 quotes, whether and, if so how, the price and other product features changed.

56. Once the questionnaires were completed the shoppers entered their data on GfK's online data collection system; and a detailed follow-up programme of quality checks was undertaken by GfK's specialist mystery shopping proofing team.

Caveats

- 57. During the process of analysing the results, it became clear that the complexity of the process did not lend itself to simple reporting. For example, one of the research objectives for the mystery shopping was to answer the question "do all DCTs provide X information?" To answer this question reports of all assessments for each DCT were examined to see whether this information was indeed provided for each DCT. In the great majority of cases all assessments reported that a particular DCT did (or did not) provide the relevant information and the research question could easily be answered "yes" or "no" accordingly.
- 58. However there were instances where *most* of the assessments for a particular DCT reported the same finding but one or more assessments indicated a different one. In some cases this was the result of how shoppers were asked to record their findings. To give one example, shoppers were asked to record what information, such as annual or monthly premium, was provided in the first quote on the results page, and for some DCTs most of the assessments reported that it did contain monthly premium, while others reported that it didn't. Examination of the screen shots taken by the shoppers revealed that this usually reflected differences in the information provided by the DCT for different providers (possibly because of differences in information supplied by providers to the DCT), and the discrepancy only occurred because in one scenario a different provider appeared at the top of the list than in others. In these instances, where the screen shot revealed that the other quotations provided below the top one did indeed include monthly premium, it was agreed that this should be reported as a finding that the DCT concerned did indeed provide monthly premiums, even though one assessment report may have reported differently.
- 59. Furthermore, in some cases the DCT itself presented results that were open to interpretation. For example, there were occasional inconsistencies between assessments of the same DCT about how the displayed results were ranked by default with it not being immediately obvious what criterion had been used by the DCT to default rank the results. There were thus a few cases where **most** assessments for an individual DCT reported the same default ranking criterion, but there were also some assessments that reported a different ranking criterion. Provided the screen shots showed that the criterion reported by the majority of assessments **could** have been a ranking criterion in the others even if the assessment had reported a different criterion the result was treated as being consistent for the majority criterion.
- 60. There were also cases where the shopper was unable to record how the DCT ranked the results because only one result was presented. In these cases, the assessment of the default ranking for that DCT was based on the majority of assessments for that DCT.
- 61. Additionally, there were also a few occasions where the report on the revisit by the shopper showed that different information was provided at the revisit from the information provided at the first visit. Examination of the screenshots and checking back with the shopper revealed that this was in some cases almost certainly the result of slightly different information being submitted to the DCT as part of the two assessment visits.



- As stated above, shoppers as in all mystery shopping exercises were given detailed scenarios for each assessment, including the responses to a whole series of information requests that they might get on the DCT. But some DCTs asked for information that was not given in the scenario instructions, and shoppers had to develop their own response to put in. Because this was not part of the formal scenario shoppers did not always keep a record of the answers given to questions outside the scenario, and may have entered a slightly different answer at the revisit. The algorithms used by DCTs can be extremely complex, and even a small variation in input variables can lead to a large difference in the providers and prices displayed by the DCT in response.
- 63. Where this quality control exercise suggested the difference between first visit and revisit was most probably the result of a slight difference in information provided by the shopper, this case was removed from the revisit results.
- 64. These examples mean that, in some cases, the findings presented in this report are the result of a judgement based on our assessment of the screen shot evidence including instances where we have taken the weight of evidence rather than 100% of the assessment reports. Examples of where this occurred are given in the appropriate sections below.

The shoppers

- 65. In total, 124 mystery shoppers from GfK's large mystery shopping panel were used, with each shopper undertaking 3.85 assessments on average across sectors. Shoppers assessing a website were most likely to use a laptop (over 50% did so) and the most commonly used browsers were Google Chrome and Internet Explorer.
- 66. The profile of the shoppers was slightly different from the UK population as a whole, but the shopper profile is more reflective of typical DCT users.
- Table 4 below compares the profile of the 124 shoppers used to the 18+ population as a whole, based on GfK Financial Research Survey (FRS) data.⁷

⁷ Source: http://www.gfk.com/products-a-z/financial-research-survey



Table 4: Mystery shopper demographic profile

Category	Sub-category	18+ Population	Mystery shopper profile	Difference
Gender	Male	49%	46%	-3
	Female	51%	54%	+3
Age band	18-20	7%	0%	-7
	21-24	7%	3%	-4
	25-34	17%	26%	+9
	35-44	16%	26%	+10
	45-54	17%	25%	+8
	55-64	14%	13%	-1
	65+	22%	7%	-15

- 68. It is important to highlight the following caveats associated with the mystery shopping exercise:
 - The assessments were undertaken between 8th December 2016 and 6th January 2017 and, therefore, provide a snapshot of those websites at that particular time. As such, changes to websites may have been made subsequently.
 - Although 56 DCTs were covered in the mystery shopping, representing a significant number of
 comparison sites, the mystery shopping did not cover every DCT active in each sector. Therefore this
 exercise aims at providing a high level overview of some DCTs in these sectors; it is not intended to
 present a comprehensive analysis of each DCT active in these sectors.
 - This was not an assessment of compliance with regulations or, in many cases, accuracy (for instance whether a site did in fact list the providers it claimed to); but intended as an overview of the typical consumer journey.

2.5 Reporting conventions

69. This report has been prepared by GfK based on the data collected from the mystery shopping conducted by GfK and the websweep conducted by the CMA.

The websweep

- 70. The websweep collected information across a number of webpages (Homepage, About Us, Terms and Conditions, Privacy Policy and elsewhere on the website) and, as such, the data from each has been combined.
- 71. Analysis by sector and individual DCTs is also included where appropriate, although it should be noted that a number of DCTs covered multiple sectors. The following broad categories and the sectors within them have been used:



Energy

Energy

Broadband and telecoms

- Broadband/fixed telecoms
- Mobile phones

Financial products

- •Lending/loans
- Credit cards
- Other finance products
- Motor insurance
- Home insurance
- Other insurance

Travel

- Hotels
- Flights
- Package holidays
- •Car hire
- Other travel and leisure

72. Due to the number of DCTs included in this websweep (35), all results are presented as raw numbers rather than percentages.

The mystery shopping

- 73. The mystery shopping data was analysed on a sector-by-sector basis, covering 7 sectors home insurance, motor insurance, credit cards, broadband, energy, flights and hotels with references to individual DCTs where appropriate.
- 74. The data has been presented in different ways depending on the topic and the most appropriate base:
 - At the DCT level to answer research questions related to the structure of comparison websites or apps (e.g. consumer information requirements, the structure of the results page, reordering and filtering, and the inclusion of technical terms), the results are presented as a proportion of all DCTs assessed in each sector (e.g. 8/15 DCTs).8
 - At the assessment level to answer research questions related to factors that could vary by
 assessment for the same DCT or app, or were open to shoppers' observations and/or interpretation
 (e.g. whether there were any featured or paid-for results, whether the results matched the shoppers'
 scenario), the results are presented as percentages of the total number of assessments carried out in
 each sector.
 - At the quote level to identify the brands that were more frequently listed on DCTs in each sectors, results are presented as percentages of the total number of quotes (as the sum of the top 10 quotes on each DCT) in each sector.
 - At the supplier/provider level to answer research questions aimed at comparing information on DCTs vis-à-vis suppliers' sites (e.g. whether the information inserted on the DCT was saved on the provider's site, how the offer changed on the supplier's site (if at all) compared to the DCT, etc), the

⁸ As noted in Section 2.4, in most cases, as might be expected, shoppers reviewing the same DCT reported the same findings – for instance in terms of what information the DCT requested from them to provide offers. In a small number of cases, however, reviewers assessing the same site reported differences in what they saw on the DCT. We discuss the details of this in our report, where it is relevant.



results are presented as percentages of the total number of providers' sites clicked-through to in each sector.

- 75. Although the base sizes are small for the results based on assessments (often lower than 100) the normal concerns about reporting percentages in survey research findings based on small sample sizes do not apply, since we are not reporting on samples of the population, but on actual experiences with DCTs. In most research we draw a sample from the universe (for example all people aged 18+ in the case of interview research, or all branches of a fast food outlet in the case of mystery shopping) and generalize from the sample we interview/observe to the whole universe. In this case, however, we are reporting on computerized services where the concepts of branches/outlets does not apply. We are effectively reporting on the entire universe of those DCTs included in the mystery shopping exercise (or more properly the universe of certain types of enquiry to those DCTs) and so the concept of sampling error does not apply. There still needs to be some caution applied, but in these circumstances it is perfectly acceptable to present assessment results in the form of percentages, and we have chosen to do this, particularly because it makes the differences between sectors much easier to understand, given the considerable difference in numbers of assessments per sector.
- 76. Throughout the report we clearly indicate the basis we have used to analyse and present the results in each chart.



3 Step 1: DCTs' general information about their services (Websweep)

- 77. Overall, DCTs can vary quite considerably in the range and nature of the information they provide on their sites about their nature and the services they offer to users. The following section provides an overview of the findings relating to the following research questions addressed for all 35 DCTs in the websweep:
 - a) What main webpages did the sites have; and how far were these from the homepage?
 - b) What types of information did DCTs appear to provide on their sites and where?
 - c) What information did the DCTs appear to provide on their ownership?
 - d) What did DCTs say about the contact address/location of owners?
 - e) What information did the DCTs provide about their use of white label providers?
 - f) What licensing information did the sites appear to have?
 - g) How did DCTs appear to describe their business model / how they make money?
 - h) Did the DCT appear to say whether financial arrangements could affect results?
 - i) Did the DCT explain how it selects suppliers; and the use of quality ratings / reviews?
 - j) What did the DCT say about sharing data, including consumer opt-outs?
 - k) What did the DCT appear to say about what consumers can do if things go wrong?

3.1 What main webpages did the sites have; and how far were these from the homepage?

78. All DCTs had a 'Terms and Conditions' and 'Privacy Policy' page; all but two had an 'About Us' page. For each of these pages, the vast majority could be accessed via a single click from the homepage (see Table 5).

Table 5: Number of clicks to get to key pages from the homepage

Dama nama	Total	Number of clicks from homepage					
Page name	Total	1	2	3	4		
About Us	33	31	2	-	-		
Terms and Conditions	35	31	1	3	-		
Privacy Policy	35	31	2	1	1		

⁹ It is important when considering the results of this websweep of DCTs to bear in mind the caveats set out in Section 2.3.



3.2 What types of information did DCTs appear to provide on their sites and where?

- 79. For each of the 35 DCTs, the websweep recorded the presence of a range of information on each of the following 'MAIN' website/app pages: Homepage; About Us page; Terms and Conditions page; Privacy Policy page.
- 80. In addition, where information was not already provided on the main four pages above, the websweep recorded whether this information appeared elsewhere on the website (with the exception of the FCA register number; and whether there was advertising for a product that was part of a market compared by the website).
- 81. Figure 1 below shows that all DCT websites/apps appeared to include information about the use of consumer data and their contact details, and all but one included information about DCT ownership/affiliation. Typically, this information was provided on the main four pages. Other information was less frequently found for instance on business models and complaints procedures. The chart shows the number of DCTs (out of a total of 35) that presented each type of information, either on the main four pages, or elsewhere.
- 82. It is important to note that for some of this information, some sites would not be expected to provide information for instance if they are not members of an accreditation scheme or not registered. Furthermore, it should be noted, that this is a record of *whether* reviewers noted some form of reference to the information or issue on the DCT pages reviewed we discuss below for some of these the *nature* of what the reviewers found.



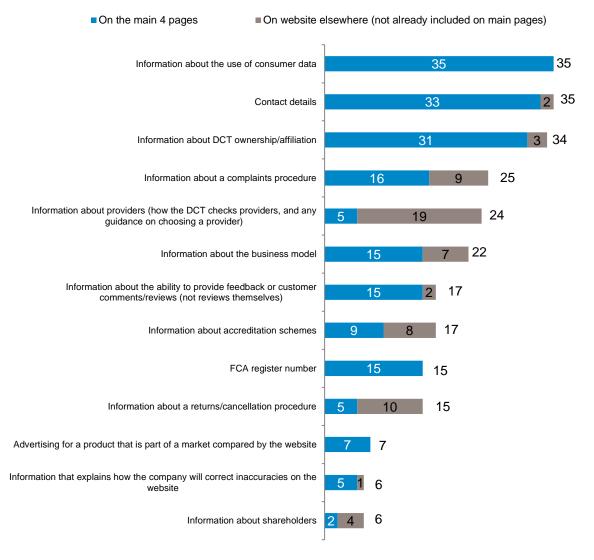


Figure 1: Differences in the provision of information across DCTs.

Note: Summary of information found by reviewers on DCT website/apps. Reviewers only checked the main 4 pages for an FCA register number; and whether there was advertising for a product that was part of a market compared by the website.

Base: 35 DCTs.

- 83. In a number of cases, information appeared to be repeated across more than one of the four main website/app pages. The table below shows, for the four main pages, the information recorded as included on each. It shows, for example, that whilst all 35 DCTs included information about the use of consumer data on their Privacy Policy pages, 21 also included information related to this on their Terms and Conditions page, five on their About Us page and one on their Homepage. For each type of information the table shows the number of DCTs, out of the total of 35, that displayed it.
- 84. While information about the use of consumer data, contact details, and DCT ownership/affiliation in particular were usually found on the main webpages; information about the suppliers on their site, cancellation policies, complaints handling and business models were often found on other pages.



Table 6: Differences in the location of information on the DCT websites.

SUMMARY OF INFORMATION PROVIDED	MAIN WEBPAGES ALL WEBPAGES						ES
ON DCT WEBSITES BY WEBPAGE	HOME	ABOUT US	TERMS AND COND- ITIONS	PRIVACY POLICY	TOTAL (main 4 pages only)	WEBSITE ELSE- WHERE (not already on main pages)	TOTAL (whole
Information about the use of consumer data	1	5	21	35	35	0	35
Contact details	19	18	26	28	33	2	35
Information about DCT ownership/affiliation	11	16	22	14	31	3	34
Information about the complaints procedure	1	5	12	1	16	9	25
Information about suppliers (how the DCT checks suppliers, and any guidance on choosing a supplier)	3	4	2	0	5	19	24
Information about the business model (including whether financial arrangements may affect the rankings and what the financial relationship between the DCT and the customer is)	5	9	6	1	15	7	22
Information about the ability to provide feedback or customer comments/ reviews (not reviews themselves)	4	3	11	0	15	2	17
Information about accreditation schemes	5	9	2	1	9	8	17
FCA register number	14	11	10	5	15	N/A	15
Information about a returns/cancellation procedure	0	0	5	0	5	10	15
Advertising for a product that is part of a market compared by the website	7	3	1	2	7	N/A	7
Information that explains how the company will correct inaccuracies on the website	0	0	5	0	5	1	6
Information about shareholders	0	2	0	0	2	4	6



- 85. Table 7 below summarises the information provided by DCT websites/apps operating within each sector. While base sizes are small and there is crossover with DCTs covering multiple sectors, some trends were observed:
 - A higher proportion of the DCTs reviewed in the broadband and telecoms sectors (15 out of 17)
 appeared to provide general information about suppliers, e.g. how the DCT checks suppliers, or any
 guidance on choosing a supplier.
 - DCTs in the travel sector appeared least likely to provide information on their business model (5 out of 16 did so). They were also slightly less likely to provide some information about the complaints procedure (10 out of 16 did so, compared with 11 out of 12 in the energy sector and 14 out of 17 in the telecoms sector).

Table 7: Differences in the level of information provided by DCT websites across sectors.

SUMMARY OF INFORMATION PROVIDED ON DCT WEBSITES OPERATING WITHIN EACH SECTOR	ENERGY	BROADBAND & TELECOMS	FINANCIAL	TRAVEL
TOTAL DCTs REVIEWED IN EACH SECTOR	12	17	16	16
of which the following number appeared to include information about the following anywhere on their website/app:				
Information about the use of consumer data	12	17	16	16
Contact details	12	17	16	16
Information about DCT ownership/affiliation	12	17	16	15
Information about the complaints procedure	11	14	13	10
Information about suppliers (how the DCT checks suppliers, and any guidance on choosing a supplier)	9	15	11	10
Information about the business model (including whether financial arrangements may affect the rankings and what the financial relationship between the DCT and the customer is)	11	17	15	5
Information about the ability to provide feedback or customer comments/reviews (not reviews themselves)	7	10	8	9
Information about accreditation schemes	7	10	9	7
FCA register number	10	10	14	5
Information about a returns/cancellation procedure	4	8	5	8
Advertising for a product that is part of a market compared by the website	1	3	2	4
Information that explains how the company will correct inaccuracies on the website	3	3	3	4
Information about shareholders	2	3	3	3



3.3 What information did the DCTs appear to provide on their ownership?

- 86. All but one of the 35 DCTs appeared to provide some information about their ownership. None appeared to have the same owner (with the exception of one of the apps which was owned by one of the DCTs in the sweep).
- 87. The reviewers looked for evidence of whether the site appeared to say it was owned, partly owned or affiliated to a company whose products or services it was comparing on its site. Twenty of the 35 DCTs appeared to provide information on this:
 - 2 were owned by companies whose products or services are compared;
 - 6 were affiliated to a company whose products or services are compared; and
 - 10 were not owned by or affiliated to a company whose products are compared. 10

3.4 What did DCTs say about the contact address/location of owners?

- 88. All 35 DCTs provided some contact details: 33 included these on their four main webpages. Reviewers recorded that 33 provided a postal address; 29 provided an email address; and 21 provided a telephone number.
- 89. Reviewers also found that all but one of the 35 DCTs displayed the owner on their website/app and 33 of these gave details of the owner's address.
 - Of these, five all of which were single-sector DCTs operating in the travel sector were based/registered outside of Europe.
 - The remaining 28 that gave details of the owner's address were all based and registered in England and Wales; all of these gave details of the owner's registered company number.

3.5 What information did the DCTs provide about their use of white-label providers?

- 90. The websweep suggested that some DCTs were using comparison services provided by others (white-label services). 11 For each of the five sectors explored by the websweep, the following number of DCTs were found to state that they used white labels or partners:
 - Energy 5 out of 12 DCTs
 - Broadband 2 out of 17 DCTs
 - Home insurance 3 out of 12 DCTs
 - Credit cards 2 out of 12 DCTs
 - Travel 3 out of 16 DCTs

¹⁰ For the remaining two DCTs, reviewers coded an 'other' response, as there was some ambiguity surrounding their affiliations/ownership.

¹¹ It should be noted that this information may not always be immediately obvious from looking at a site, because sites differ in how they badge and integrate white label services.



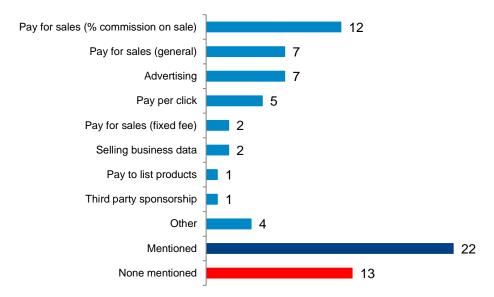
3.6 What licensing information did the sites appear to have?

- 91. The reviewers checked to see whether the DCTs were listed as being registered with the FCA or ICO. It should be noted that they did not assess whether sites were subject to any requirement to register with the FCA or ICO or provide details, only whether or not they appeared to be registered or licensed; and whether reviewers could see a registration or licence number on the DCT's site. Reviewers found that:
 - Twenty-four of the DCTs were found to have an FCA register number¹². This included 15 of the 16 DCTs that compared financial services. The reviewers recorded finding the registration number on 15 of the 24 DCT sites.
 - Twenty-one of the DCTs were registered with the Information Commissioner for data protection purposes¹³. Of these 21 DCTs, six were found to display the ICO number on their website.

3.7 How did DCTs appear to describe their business model / how they make money?

- 92. In terms of their revenue sources, 22 of the 35 sites appeared to provide some information on their webpages/apps (with some citing multiple revenue sources). These sources are summarised in Figure 2 below.
- 93. Thirteen DCTs did not appear to provide any information about their revenue sources.

Figure 2: Differences in the provision of information relating to revenue sources



Note: Information about revenue sources apparent on DCT websites/apps

Base: 35 DCTs.

¹² Reviewers used the website https://register.fca.org.uk/ to check whether DCTs were registered (had an FCA register number) on the Financial Services Register. The Financial Services Register is a public record that shows details of firms, individuals and other bodies that are, or have been, regulated by the Prudential Regulation Authority (PRA) and/or the Financial Conduct Authority (FCA). The FCA regulates and supervises the conduct of more than 50,000 firms in the UK that provide financial products and services to both UK and international customers.

¹³ Reviewers used the website https://ico.org.uk/esdwebpages/search to check whether websites were registered.



3.8 Did the DCT appear to say whether financial arrangements could affect results?

- 94. Twelve DCTs appeared to say whether or not financial arrangements with suppliers can influence how results are presented (e.g. ranking, prominence, size of text). DCTs in the travel sector did not tend to say whether or not financial arrangements influenced their results (2 out of 16 appeared to refer to this).
- 95. Of the 12, three appeared to state that financial arrangements with suppliers did influence how results are presented, nine appeared to say that they did not.
- 96. Of the three DCTs that appeared to say that financial arrangements with suppliers did influence how results are presented, two stated that this would be clearly identified when the customer makes a comparison (e.g. the ranking will be flagged as a sponsored result). The remaining DCT appeared to make no mention about whether or not such results would be identified in this way.

3.9 Did the DCT explain how it selects suppliers; and the use of quality ratings / reviews?

- 97. Thirteen DCTs appeared to state whether or not they pre-checked suppliers for credibility and legitimacy before listing them: eight DCTs said that they did and five said they did not.
- 98. Fourteen DCT websites/apps were found to mention that they offered a feedback platform for consumers to share their experience on purchases via the DCT website or any of the retailers. Reviewers found that of these 14:
 - Five appeared to state that they reserved a right to delete anything from the feedback platform, such as any unfavourable feedback.
 - Three appeared to mention whether or not the website verified that comments shown have been made by someone who had purchased a product: two stated that they did and one stated that they did not verify this.
 - The same number of DCTs were found to include some information about whether it had taken steps
 to discourage fake reviews and ensure that they are trustworthy, although they varied in the level of
 responsibility taken.

3.10 What did the DCT appear to say about sharing data, including consumer opt-outs?

- 99. All 35 DCT websites/apps included some information on one or more of their four main webpages about their use of consumer data. Reviewers typically found the information in their Privacy Policy or Terms and Conditions pages.
- 100. Personally identifiable information (PII):14
 - No DCTs appeared to state that they would or might sell PII to other parties; and eight appeared to state
 that they would not sell such data. Most sites were, however, silent on this issue.¹⁵
 - Three DCTs appeared to say that they would share PII with third parties and 28 that they might do so –

¹⁴ For the purposes of the review, PII was defined as information that can directly identify the consumer (eg. name, address, email). This information is typically entered by the consumer actively, as part of a search.

¹⁵ However, 12 DCTs appeared to say that data may be passed to a third party in the event of a sale of their business.



- with one appearing to state that it would not share such data.
- Where DCTs appeared to say that they would or might share PII, 13 stated who the information would be passed to (with six of these referring to a named party or parties).
- 101. Non-Personally identifiable information (non-PII):16
 - No DCTs appeared to say that they would sell non-PII to other parties and six appeared to state that
 they would not sell such data, while one appeared to say that it might sell such data. Again, most sites
 were silent on this issue.
 - Seven DCTs appeared to say that they would share non-PII with third parties and 23 that they might do so with only one appearing to state that it would not share such data.
 - Where DCTs appeared to say that they would or might share non-PII, 19 stated who the information would be passed to (with 12 of these referring to a named party or parties).
- 102. Reviewers sought to identify the extent to which DCTs provided them with information on their main pages on what control they could exercise over whether the DCT or third parties could use their PII to contact them for marketing purposes in the future. This information was typically contained in their Privacy Policies or Terms and Conditions. The reviewers found varying practices:¹⁷
 - All but 3 of the DCTs appeared to offer some form of control over whether the DCT could contact the
 consumer in the future for marketing purposes. In approximately two thirds of the cases, this was in the
 form of an opt-out to such future communications (typically by suggesting they contact the DCT directly,
 or by providing an unsubscribe link in emails), although a minority appeared to offer an opt-in to further
 contact. In some cases, reviewers found the explanations guite lengthy or unclear.
 - Approximately half of the DCTs reviewed did not appear to offer information about whether third parties
 could contact the consumer for marketing purposes. Where they did, most DCTs appeared to offer optouts to third party marketing and a small number appeared to say that they did not share contact
 information for third party marketing.

3.11 What did the DCT appear to say about what consumers can do if things go wrong?

- 103. Reviewers looked for references to complaints processes, and any applicable cancellation periods and rights to redress.
- 104. A total of 25 of the 35 DCTs appeared to provide some information about their complaints procedures. Of these, 22 provided information on how to complain to them about problems in connection with the comparison itself (and 20 providing specific contact details for complaints). The reviewers considered that this information was clearly presented in all but two cases.
- 105. Reviewers found that 17 DCTs stated a minimum period for dealing with and responding to complaints, although reviewers also recorded variation in the level of detail provided as well as the time periods given.

¹⁶ For the purposes of the review, non-personally identifiable information was defined as information that does not directly identify the consumer (eg. products the consumer has searched for, time spent on the website). Some non-PII is actively entered by consumers, but much non-PII is collected through cookies.

¹⁷ These results should be treated with some care since it reflects what the reviewers were able to identify on the sites they reviewed within a reasonable timespan. It is also possible that the DCTs and suppliers would provide further information on their use of consumer data and controls over future contacts as part of the consumer journey.



In a majority of cases (12 out of 17) they found this information elsewhere on the site (i.e. not on the main pages).

- 106. Sixteen DCTs appeared to include information about what a consumer can do if unsatisfied with the response to a complaint: 11 DCTs (all operating in the Financial Products sector) directed the consumer to the Financial Ombudsman Service (FOS).
- 107. Overall, 15 DCTs appeared to provide any information about returns/cancellations procedures. ¹⁸ Thirteen DCTs stated its (or its suppliers') cancellation policy on its website ¹⁹ and of these, nine stated the cancellation period.
- 108. The reviewers also looked at DCTs covering the following five sectors, to explore in greater detail the level of information provided in relation to the deals and comparisons offered:
 - Energy
 - Broadband
 - Credit cards
 - Home insurance
 - Flights

109. The reviewers sought to answer the six questions set out in Table 8 for each relevant DCT and by each sector:²⁰

¹⁸ Care should be taken when interpreting this information, since cancellation and return policies will depend on the product and whether the DCT sells them itself.

¹⁹ Four provided this information on their Terms and Conditions page, the remainder provided this information elsewhere on the website.

²⁰ The reviewers conducted this analysis on the same set of 35 sites, but focused on the specific case study sectors for the market study (broadband, credit cards, home insurance and flights), plus energy. In some cases, the same DCT covered multiple sectors, but the reviewers sought to identify what the site appeared to say about its services for each sector. Because the bases for these questions differs from the rest of the sweep analysis (for instance, addressing the 14 sites that provided flight comparisons rather than the 16 sites that covered the wider travel category), we have kept the analysis separate.



Table 8: Differences in the level of information provided by DCT websites across sectors in relation to factors such as market coverage, pricing and ranking.

	ENERGY	BROADBAND	CREDIT CARDS	HOME INSURANCE	FLIGHTS
	TOTAL MENTIONS	TOTAL MENTIONS	TOTAL MENTIONS	TOTAL MENTIONS	TOTAL MENTIONS
Total number of sites assessed by sector	12	17	12	12	14
Of which the following number addressed at least to some extent the following					
1. What, if anything, is said about how often [product] prices are updated?	4	8	5	1	1
2. What, if anything, is said about guaranteeing consumers the best [product] price, or claiming that they won't be able to find lower prices for [product] elsewhere?	7	8	6	5	6
3. What, if anything, is said about how much the website saves consumers on their [product] bills?	6	1	1	5	1
4. What, if anything, is said about how much of the [product] market the website covers?	6	6	8	8	2
5. What, if anything, is said about limitations of the comparisons it makes?	3	8	6	5	4
6. What, if anything, is said about how the DCT ranks the [product] search results, prior to actually searching? (I.e. do not actually search for a deal to see how offers are ranked).	3	4	5	5	1

110. Very broadly, the DCTs covering flights appeared least likely to have information on their sites relating to most of the issues listed above. Overall, across most sectors, relatively few sites appeared to explain at a high level (ie prior to a search) their policies on keeping offers up-to-date, or their methods for ranking offers. Many sites, especially for flights and broadband, also did not appear to explain their market coverage.

3.12 What did DCTs appear to say about their policies on updating offers?

- 111. Most DCTs appeared not to address the issue of how often they updated their offers less than half in every sector appeared to provide information on this. In the case of the home insurance and flights sectors only 1 in 12 and 1 in 14 DCTs respectively appeared to address the issue.
- 112. Where DCTs did address the issue of updating their offers, their descriptions varied:
 - In six cases, the DCTs referred to prices being updated daily (or in one case 'at least monthly') and in a further two cases, the DCT appeared to refer to providing a 'last updated' date';
 - In eight cases, the DCT appeared to refer more generally to monitoring prices or ensuring accuracy, and in two of these cases this included references to the site not being liable for inaccuracies; and
 - In a further three cases, the DCT provided a disclaimer referring for instance to the possibility that prices (and other information) might not be up-to-date.

3.13 What general claims did DCTs appear to make about offering the 'best' products?

- 113. About half the DCTs across all sectors appeared to comment on how consumers would benefit from using their site typically at a general level. In terms of the most frequently cited comments:
 - In 14 cases, across all sectors, DCTs appeared to include statements to the effect that they offered the 'best' or the 'cheapest' deals.



- In seven cases, also across different sectors, DCTs appeared to include statements to the effect that consumers would not be able to buy the product more cheaply by going to the suppliers' sites.
- In six cases, DCTs simply made general statements about how consumers could save money by using them. Others made general claims about being the best comparison site.

3.14 What specific savings claims did DCTs appear to make?

- 114. Fewer DCTs appeared to make more specific claims about how much their site could save consumers, and the prevalence and nature of such claims again differed by sector:
 - One DCT in each of the broadband, flights and credit cards sectors mentioned something about how much consumers might save; compared with five in home insurance and six in energy.
 - Seven of these claims were in the form of 'save up to £xx', while two referred to average savings made by consumers; two to a percentage saving; and two to many users being quoted a price 'below £x'. Another provided a savings calculator. Some of the claims were based on quoted proportions of consumers who had made or could make the claimed savings.

3.15 What did DCTs appear to say about the extent of their market coverage?

- 115. There were differences by sector in the level of information apparently provided by DCTs about market coverage:
 - The credit cards and home insurance sectors had the highest proportion of DCTs that appeared to say something about their coverage: 8 out of 12 in both cases.
 - Of the 12 DCTs offering energy, six mentioned something about how much of the market their site covers.
 - Of the 17 DCTs in the broadband sector, six mentioned coverage; and 2 out of 14 in the flights sector did so.
- 116. Of those DCTs that appeared to comment on their market coverage, explanations varied by DCT and sector:
 - For the six in energy most sites said that they covered all the market, with the others stating that they 'aimed to' or equivalent.
 - Both the DCTs in the flights sector that mentioned coverage and most of those in credit cards and home insurance that did so described it either in numerical terms (i.e. stating the number of suppliers), or in percentage terms (i.e. stating the proportion of all suppliers they covered).
 - In broadband, three of the six sites that appeared to comment on their coverage explained that they may not cover all suppliers. One referred to its coverage in percentage terms and the other two referred to offering 'many' suppliers or equivalent.

3.16 What if anything did sites say about the limitations of their comparison?

- 117. Across all the sectors, some DCTs appeared to mention various limitations to the comparisons they provide varying from 3 out of the 12 offering energy, to 8 out of 17 for broadband and 6 out of 12 for credit cards. In particular, where mentioned, the main disclaimers were one or more of the following:
 - the site might not be offering the whole of the market for the sector;
 - deals can change, or that accuracy is not guaranteed; and
 - availability and prices might change according to the consumer's circumstances.



3.17 What, if anything, did sites appear to say about their ranking methodologies?

- 118. Relatively few DCTs appeared to provide general information on their main pages (i.e. before users commenced making a comparison) about how they ranked results and this again differed by sector. Reviewers recorded that:
 - In both the home insurance and credit card sectors, 5 out of the 12 DCTs provided some information on ranking, a quarter did so in energy (3 out of 12) and broadband (4 out of 17) and 1 out of 14 did so in flights.
- 119. As with the other questions, where DCTs did explain their ranking practices, these explanations differed:
 - In eight cases across three sectors (energy, broadband and home insurance), they appeared to refer to first ranking by price or savings the most frequent explanation.
 - In a couple of cases, the DCT appeared to suggest it ranked by popularity (in broadband) and by eligibility (in credit cards).
 - In a couple of cases (both in credit cards), the sites appeared to refer to putting at the top of the list offers from suppliers with which they had an arrangement.
 - In a further six cases, various ranking factors were mentioned but it was unclear what the default ranking would be.

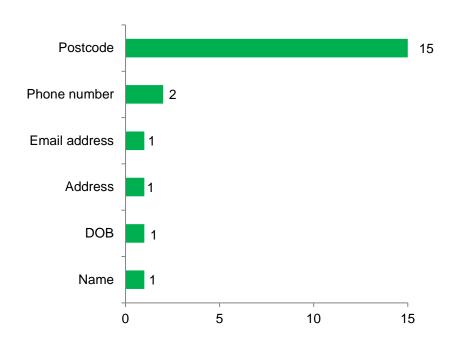


4 Step 2: Consumer information requested by DCTs (Mystery shop)

4.1 What consumer information is requested by DCTs?

- 120. The results of the mystery shopping indicate that the type of consumer information requested varied substantially across sectors and that, even within some sectors, there was some variation across comparison sites. DCTs in the insurance sectors requested the most information, whereas DCTs in flights and hotels required very little, if any, such information.
- 121. In home and motor insurance the shopper's name, postcode, address, email address and date of birth (DoB) were requested by every DCT. The shopper's phone number was requested by every DCT in home insurance (although, whilst this was requested on one DCT website, it was not requested on the app), however one of the seven DCTs in this sector did not request this information in motor insurance.
- 122. In the travel sector (i.e. flights and hotels), very little personal information was requested and only two DCTs in the hotels sector requested an email address.
- 123. In both the broadband and energy sectors, every DCT requested the shopper's postcode, but otherwise there were significant differences in terms of the other information requested. For example, in broadband (Figure 3) only a DCT app requested the shopper's email address, address, date of birth (DOB) and name. In the energy sector only one DCT did not ask for the shopper's email address. In addition, whilst this information was requested on another DCT website it was not requested on the app.

Figure 3: Information requested on broadband DCTs



Note: Are you asked to enter the following details? Please select all that apply.

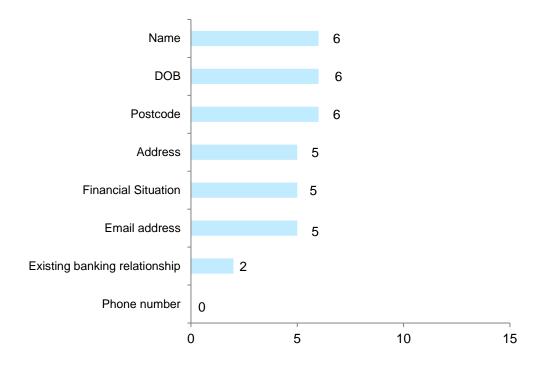
Base: 15 DCTs.

124. In the energy sector all eight DCTs requested home postcode, and six requested an email address.



125. Unlike the other sectors, for credit cards there was no one type of personal information that was consistently requested by all DCTs (Figure 4). Instead fewer than half of DCTs requested information on shopper's name, date of birth and postcode and a third or fewer requested other information such as address or financial situation. This reflects the finding that seven DCTs did not request any personal information and results are shown without input from consumers.

Figure 4: Information requested on credit card DCTs



Note: Are you asked to enter the following details? Please select all that apply.

Base: 15 DCTs.

- 126. Shoppers were also asked to confirm what additional information was requested by DCTs to inform the selection of the most appropriate offers to present. As expected, the type of additional information requested varied substantially between sectors according to the specific product or service being compared. For example, comparison sites in insurance asked for information on the property or vehicle to be insured, whereas DCTs in flights asked for information on the travel details.
- 127. In the energy sector every DCT requested information on the shopper's current payment method, usage, type of energy, current tariff, provider and whether the shopper had an economy 7 meter (although this was not necessarily requested if the consumer was enquiring about 'gas only'). This additional information was required by DCTs to provide shoppers with an indication of the total savings they could earn by switching to the listed providers and energy tariffs.



128. In home insurance, additional information relating to the property to be insured and its occupants was consistently requested across all DCTs (i.e. property information, contents, security, building construction, previous claims, property left unattended, and whether any occupants smoke). One DCT did not request information on 'previous criminal offences' and 'previous insurance claims'; and, in addition, there were some differences between this DCT's app and website (e.g. the website asked if the shopper was a landlord or tenant, the app did not). Only three of the 15 home insurance DCTs asked whether the property was a holiday home.

Property information Contents Security **Building construction** Previous claims Property left unattended 15 **Smoking** 15 Landlord / tenant Previous criminal offences Previous insurance declines Cost of rebuilding home Holiday home 0 5 10 15

Figure 5: Information requested on home insurance DCTs

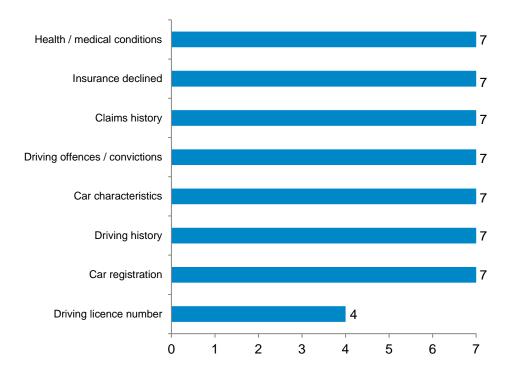
Note: Are you asked to enter the following details? Please select all that apply.

Base: 15 DCTs.

129. Motor insurance was similar to home insurance in terms of type of additional information requested, with all seven of the DCTs assessed requesting information on the vehicle to be insured and its users (ie health / medical conditions, insurance previously declined, claims history, driving offences / convictions, car characteristics, driving history and car registration) – see Figure 6. The one element that was not common across DCTs was 'driving licence number', which was only requested by four DCTs (however, this element was not mandatory in order for the DCT to provide a list of quotes).



Figure 6: Information requested on motor insurance DCTs



Note: Are you asked to enter the following details? Please select all that apply.

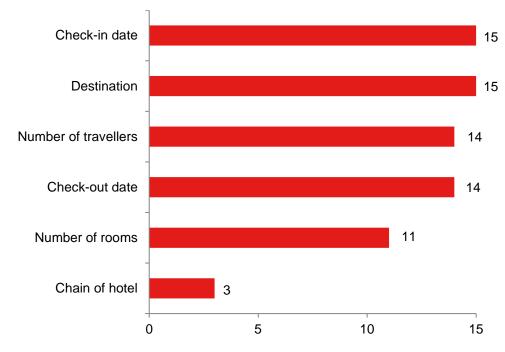
Base: 7 DCTs.

130. In the hotels sector all fifteen DCTs requested the shopper's check-in date and destination (Figure 7). One DCT did not request the number of travellers (unless a family or multiple rooms were requested) and another one instead of asking for the check-out date, requested the total number of nights. There were also small differences in the number of DCTs that asked the number of rooms and only three requested the name of the hotel chain.²¹

²¹ Those shoppers assessing hotels on one DCT were all re-directed to an alternative DCT following the instruction to 'get prices'.



Figure 7: Information requested by hotel DCTs

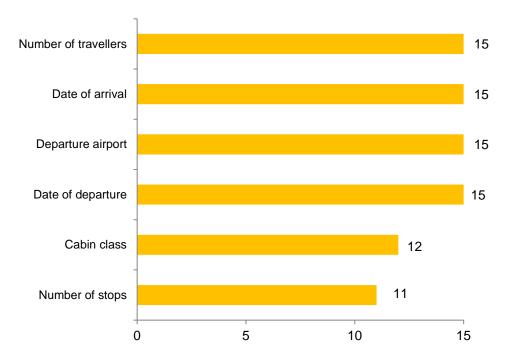


Note: Are you asked to enter the following details? Please select all that apply.

Base: 15 DCTs

131. Finally, all DCTs in flights requested the number of travellers, date of arrival and departure, and destination airports (Figure 8). Four DCTs did not request the 'number of stops' and three did not request the 'cabin class'. No DCT asked for 'baggage allowance' information.

Figure 8: Information requested on flights DCTs



Note: Are you asked to enter the following details? Please select all that apply.

Base: 15 DCTs



4.2 Summary

- 132. There are clear differences between sectors in terms of the information requested of consumers by DCTs; however within each sector there was a high level of similarity between DCTs in terms of the information requested.
- 133. In both the home and motor insurance sectors, DCTs require key pieces of both personal and financial information in order to generate results which match the exact needs of the customers including factors relating to the household to be insured (home insurance) and the car to be insured (motor insurance). Therefore, with few exceptions, detailed information about the consumer and their property were requested across all the DCTs assessed for these sectors.
- DCTs in the energy sector, in common with insurance, also require information about the household in order to establish the most appropriate results and potential savings of switching to a new supplier. As such, every DCT assessed in the mystery shopping established current payment method, usage, type of energy and current tariff and supplier and whether (for those requiring electricity) an Economy 7 meter was used.
- 135. In the broadband sector, however, the only piece of information requested by all DCTs was the mystery shopper's postcode. All DCTs were able to deliver an initial results page relating to the 'best offers' on the market without the need for any additional information.
- 136. DCTs in the travel sectors (i.e. hotels and flights) were similar in as much that the key information about the mystery shopper's trip (e.g. destination, travel dates, number of travellers) was requested by all DCTs in order to derive the most appropriate results.



5 Step 3: Presentation of results by DCTs (Mystery shop)

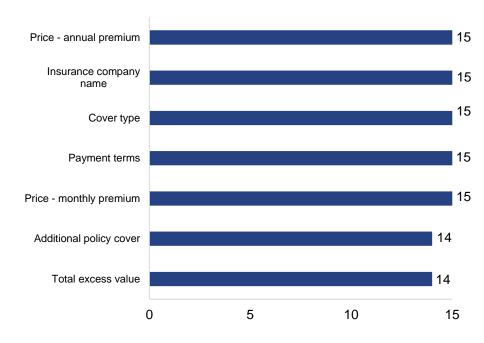
- 137. Shoppers assessed the results pages of every DCT to answer the following key research questions:
 - What product dimension information is provided?
 - What is the default ordering of results?
 - Is it possible for consumers to filter the results?
 - Is it possible for consumers to re-order the results?
 - Is an explanation of technical terms provided?
 - Do DCTs display advertising?
 - Are results consistent with the search criteria?
- 138. In addition, the brands shown in the top 10 quotes on every assessment were identified to understand the brands most commonly displayed in each sector (see section 5.7).
- 139. As explained in the introduction (Section 2.4), there were some differences in outcomes for individual DCTs that may reflect possible differences between providers in the information they provide to DCTs and where the screenshot evidence showed this was an isolated event, it was decided to treat this DCT as consistently supplying the information, rather than sometimes providing and sometimes not. For example, if the first quote presented did not show a certain type of information, but every other quote presented did provide it, then that DCT was treated as always providing the information.

5.1 What product dimension information is provided?

- 140. Shoppers were instructed to assess the first quote presented on the results page to ascertain what information was provided by DCTs. As expected, there were substantial differences across sectors in terms of the product characteristics displayed. While DCTs in each sector tend to present the same information, there were more differences between DCTs in the energy sector.
- 141. In home insurance, every DCT displayed information on the first quote relating to annual premium, the insurance company name, cover type, and payment terms (Figure 9). In addition, whilst the monthly premium was not provided in the first quote on *every* assessment, every DCT provided this information on either the first quote shown, or if not on the first quote then on all other quotes shown. As discussed above, this was treated as the DCT consistently providing this information.
- 142. The redacted screenshot (Figure 10) shows an instance of this. The DCT shows both monthly and annual premiums for all of the quotes provided except for the quote at the top of the list. Because it still has a heading "or pay monthly" but instead of a figure it just says "Check with provider" this is a good example of a case where the provider may not have supplied the information, but the DCT would presumably have displayed it if available, as it did for other providers. Thus this DCT is recorded as having provided monthly premium consistently.



Figure 9: Product characteristics presented by home insurance DCTs



Base: 15 DCTs

Figure 10: Redacted screenshot showing an example of different product information presented across offers on the same DCT

143. In motor insurance all DCTs consistently displayed information on annual premium, insurance company name, payment terms, additional policy cover, total excess value and monthly premium²² (Figure 11). One DCT never displayed information on 'cover type', while two always displayed it and the remaining four DCTs displayed cover type in the majority of cases.

CMA Digital Comparison Tools (DCT) Mystery Shopping and Websweep Research Report

²² Using the definition of "consistently" discussed above.



Price - annual premium Insurance company name Payment terms Additional policy cover Total excess value Price - monthly premium Cover type 0 1 2 3 5 6 7 4

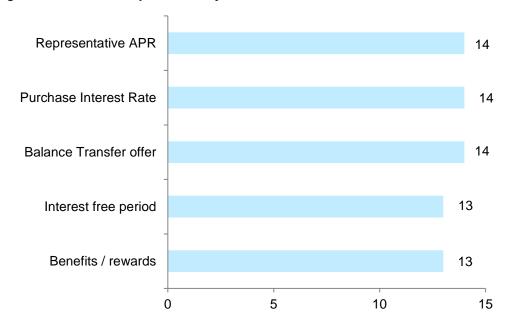
Figure 11: Information presented by motor insurance DCTs

Base: 7 DCTs

144. In the credit cards sector, one of the 15 DCTs never showed representative APR, purchase interest rate or balance transfer offers on any of its assessments (Figure 12). Other than minor differences between assessments of the same DCT of the type discussed above, all the other DCTs displayed information on representative APR, purchase interest rate, and balance transfer offers, and all but one of them displayed interest free period and benefits / rewards.



Figure 12: Information presented by credit card DCTs

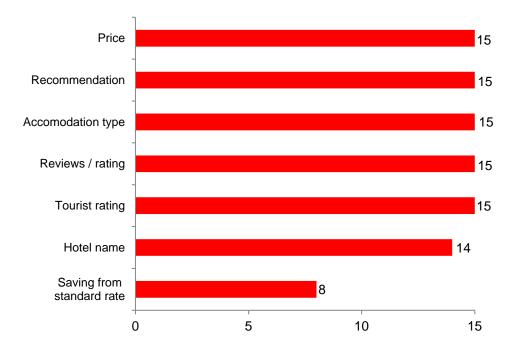


Base: 15 DCTs

- 145. However, there were sites which did not display this information as follows:
 - 2 DCTs did not show the 'interest free period'.
 - 2 DCTs did not show benefits / rewards.
 - On the results page of one DCT the DCT provides a list of credit cards (without consumers needing
 to input any information), a brief description and the cashback the buyer would receive if purchased
 via the website. Further click-throughs are required to obtain more information and then click-through
 to the provider site (although this was only possible for customers signed-up to this DCT).
- 146. Every DCT in the hotels sectors displayed similar variables price, recommendation, accommodation type, reviews/ratings and tourist rating (Figure 13). One DCT did not include the hotel name and just over half of the DCTs displayed 'savings from the standard rate'.



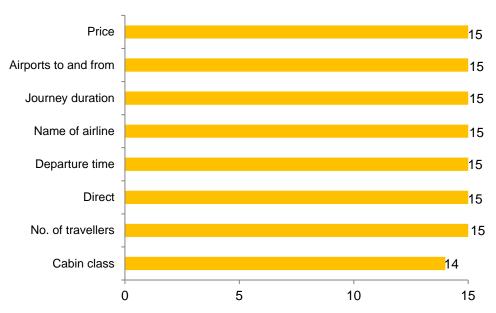
Figure 13: Information presented by hotel DCTs



Base: 15 DCTs

All 15 DCTs in the flights sector displayed seven of eight pieces of similar information, and all but one DCT showed cabin class (Figure 14).

Figure 14: Information presented by flights DCTs



Note: Looking at the first quote presented based on your scenario and the initial ranking on the results page, what of the following information is provided?

Base: 15 DCTs



In the energy sector, every DCT displayed the 'estimated level of savings', which is an estimate that can only be calculated based on the information provided by consumers about their current usage and payment (Figure 15). In addition, every DCT displayed the rate type, the yearly bill or projection and the variable 'how long the rate is fixed for'. However, slightly fewer DCTs displayed information on other dimensions such as exit fee, payment options and fuel type, and only half of DCTs assessed provided information on the monthly bill.

Estimated level of savings
Rate type

Price - yearly bill or projection
How long the rate is fixed for
Exit fee
Payments options
Switch through a DCT
Fuel types
Price - monthly bill
0 2 4 6 8

Figure 15: Information presented by energy DCTs

Note: Looking at the first quote presented based on your scenario and the initial ranking on the results page, what of the following information is provided?

Base: 8 DCTs

- All the DCTs assessed in broadband provided the same product information about the provider's name, monthly bill, contract length and broadband usage and speed.
- In summary, across all sectors there are product dimensions which are included by all DCTs. In every sector the price of the product or service (defined as annual / monthly premium, estimated level of savings, price or APR) is shown across the board; and beyond that only a small handful of DCTs differ from the majority in showing the product dimensions relevant to the product / service required on the results page.

5.2 What is the default ordering of results?

- 151. Shoppers were instructed to assess the order in which results were shown on DCTs, based on the initial presentation of results. Shoppers found that the default ordering was often a measure of price or savings across many of the sectors assessed.
- As outlined in section 2.4 above, it was not always obvious which criterion had been used to rank results, and screenshots were used to reach a judgement as to whether differences in assessments within any given DCT represented real differences in criteria used, or just different shoppers reaching (entirely reasonably) different conclusions when the results were in fact consistent.



- 153. In **home insurance**, all the assessments found that the default ordering was based on annual premium, across all 15 DCTs.
- In **motor insurance** there was less consistency. For four of the DCTs all the assessments for that DCT showed results that were ordered by annual premium. However, across the other three DCTs the picture was less clear with assessments for the same DCT reporting different results. As an example for one DCT six assessments showed results ordered by annual premium and the remaining one showed results ordered by monthly premium, while for another DCT five assessments showed annual premium and just one monthly. The most extreme case was the final DCT, which ranked by annual premium in two assessments and by monthly premium in three.
- The redacted screenshots in Figure 16 show the results of two assessments for the same DCT the first showing ranking by monthly premium and the second by a total annual cost built up from those displaying monthly premiums. It is important to note, however, that in the first assessment where the results are ranked on monthly premium the shopper followed Scenario 2 (which includes an instruction to pay monthly); whereas in the second assessment relating where the results are ranked on annual premium the shopper followed Scenario 1 (which includes an instruction to pay a lump-sum). This indicates, therefore, differences in the ranking of results depending on the information provided by customers.

Figure 16: Redacted screenshots showing two examples of the same DCT ranking results differently – annual premium vs monthly.

The redacted screenshots in Figure 17 show another example of the same DCT ranking differently. In the first case the results appear to be ranked on the £17.03 'cheapest monthly' option, but the table also shows annual premium below. In the second example results seem to be ranked on the £221.10 'cheapest annually' option, but the table also shows monthly premium underneath. It is thus not difficult to see how one shopper chose 'annual premium' as the default ranking and another chose 'monthly premium'. However, as outlined above, it is also important to note that in the assessment relating to screenshot 1 (where the results are ranked on monthly premium) the shopper followed Scenario 2 (which includes an instruction to pay monthly); whereas in the assessment relating to screenshot 2 (where the results are ranked on annual premium) the shopper followed Scenario 1 (which includes an instruction to pay a lump-sum).

Figure 17: Redacted screenshots showing an example of a DCT ranking results differently²³

157. In the redacted screenshot (Figure 18) the ranking is displayed in the final column, but the column is headed simply "premium" with no indication of whether the premium is annual or monthly. The sheer scale of the price means it has to be annual, but in fact examination of the detailed numbers shows that the number in large font is an annual total based on monthly premiums, and the simple annual premium

²³ The 'Black box' option referred to in the redacted screenshot refers to insurance (also known as 'telematics insurance') where a car is fitted with a small black box that is used to gather information on things like the time of day or night the car is driven, the speed driven at on different sorts of road, sharp braking or accelerating, total mileage, mileage on different types or road, and so on. This information is then used to work out how safely the car is driven, and this can be a means to reduce the cost of insurance for high risk groups like young drivers.



shown below the monthly calculations is not only lower, but also shows a different ranking order. However, as above, it should be noted that in the three assessments where the shopper indicated the results were ranked on annual premium, the scenarios involved a 'lump sum' payment; whereas in the two assessments where the results were ranked on monthly premium, the scenarios involved a 'monthly' payment.

Figure 18: Redacted screenshot showing an example of the same DCT ranking results unclearly from a shopper perspective

In **energy**, there were five DCTs for which every assessment reported that the quotes were ordered by 'estimated level of savings'; and two further DCTs where every assessment reported that the quotes were ordered by 'yearly bill / projection'. On the remaining DCT, however there were differences in the reports of different assessments for that DCT. On four of the assessments for this DCT the shopper reported that it ranked on 'price – yearly bill', while one reported that it ranked on 'estimated level of savings'. In the redacted screenshots (Figure 19) the ranking appears to be on 'estimated level of savings', as that is highlighted. The same is true of the second one, but in fact in that example the savings increase going down the list.

Figure 19: Redacted screenshots show an example of a DCT ranking results unclearly from a shopper perspective

- 159. In the case of **flights**, for 12 of the 15 DCTs every assessment reported that results were ranked on price. For the remaining three DCTs most, but not all, assessments reported ranking by price. Again, where there were differences this may simply be the result of it not being clear to shoppers exactly how the results had been ranked.
- 160. In the redacted screenshot (Figure 20) only one price was presented, but there were three different departure times, so the shopper quite reasonably reported that the ranking was by departure time.

Figure 20: Redacted screenshot showing an example of a shopper indicating 'departure time' as the default ranking

There were other occasions where the way the results were presented made it difficult for shoppers to record consistent findings. In the redacted screenshot (Figure 21) the way the text suggesting a specific option was a smart choice appeared in a large and contrasting font led the shopper to conclude that the default ranking was indeed a smart choice and thus coded "other" rather than price; despite that the remaining results are ranked on price. In the redacted screenshot below that (Figure 22), only one result is provided. Since it is impossible to rank a single result, the shopper again coded this as "other". In a particularly volatile market like flights it seems likely that differences in the assessment reports for the same DCT may simply be an artefact of changes in the number of results that came up.



Figure 21: Redacted screenshot showing an example of a shopper indicating 'other' as the default ranking

Figure 22: Redacted screenshot showing an example of a shopper indicating 'other' as the default ranking due to only one quote being available.

- The picture was also mixed in the **hotels** sector, with every assessment across ten out of fifteen DCTs indicating that the results were ordered by recommendation, whilst assessments across the remaining five DCTs indicated a range of other factors (none clearly relating directly to the price)
 - The results on one DCT (all via another DCT) all appeared to be ranked on 'relevance';
 - Two DCT results were all ranked on 'popularity'; and
 - A further 2 DCT results were all ranked on 'best deals'.
- In the **broadband** sector, the ordering varied both across DCTs and in some cases for assessments of the same DCT. In four assessments, the order was unclear to the shopper and in one assessment only one quote was provided (thus preventing the shopper from establishing the ranking system). However, in the majority of the remaining assessments (76%) the quotes were ordered by a measure of price²⁴ (either 'monthly price', 'total first year charges' or, in one case, 'total charges over the contract period'), with a small number of other factors such as popularity / customer reviews / top picks or deals also mentioned. Where DCTs showed both 'monthly price' and 'total first year charges' the shoppers would not necessarily have been able to distinguish the factor on which the quotes were ranked (as the order was the same), so the two responses have been combined for the purposes of this analysis:
 - a. 9/15 DCTs ranked the results on price (either identified as 'monthly price' or 'total first year charges'). This includes one DCT where the ranking was identified as 'monthly' price on three assessments; but was unclear on the three remaining assessments.
 - b. 4/15 DCTs where the results were ranked on price in half or more of the assessments undertaken; whilst in the remaining assessments the top ranked quote appeared to be based on a 'top pick', 'top deal' or because it was 'sponsored deal'.
- 164. Of the remaining two DCTs, in one case two of the five assessments indicated a ranking on price with the remaining three based on customer reviews or rating; and in the other case three of the five assessments indicated a ranking on 'top deal', one indicated a ranking on 'monthly price' and the other assessment indicated a ranking on 'broadband speed'. In this second example, the default ranking appears to be based on the customer requirements. For example, if the shopper requested 'fastest broadband' the results would be ranked on this factor.
- 165. In the credit cards sector, the ranking was largely dependent on the type of credit card chosen and, as such, there was variation across DCTs, but also in some assessments for the same DCT. For example, on one DCT, in two of the four assessments the quotes were ranked by representative APR, one was

²⁴ This may reflect to some extent the requirement in Ofcom's accreditation scheme for default ranking to be price-related. Ofcom, Accreditation scheme for price calculators.



ranked by balance transfer offer and one by the introductory offer on purchases. Again, because of the extent of the differences we present results based on assessments across all the DCTs. Overall:

- 20% of assessments reported that results were ordered by 'representative APR'. These assessments
 were spread across 7 of the 15 DCTs. There was no DCT that ordered results by representative APR
 on every one of its assessments. Thus 8 of the 15 DCTs never ranked by representative APR.
- 15% of assessments reported that results were ordered by 'balance transfer offer', and these 15% were spread across 6 of the 15 DCTs.
- 12% of assessments reported that results were ordered by 'likelihood of being accepted', and only 4
 of the 15 DCTs ever ranked by this.
- 9% of assessments reported that results were ordered by 'benefits / rewards / cashback'. Just 6 of the 15 DCTs ever ranked in this way.
- 9% of assessments reported that results were ordered by 'introductory offer on purchases', and again 6 of the 15 DCTs ever ranked in this way.
- In summary, with the exception of DCTs in the hotels and credit card sectors a measure of price or savings was predominantly used by DCTs to order the results. In credit cards, the rankings depended on the consumer's requirements and in hotels, whilst the majority of DCTs ranked the results on 'recommendation', the default ranking was not always clear.



Table 9: Overview of DCTs' default quote ordering by sector.

Sector	Number of DCTs assessed	Overview of default ordering by proportion of DCTs
Home insurance	15	all ordered by annual premium
Flights	15	all consistently ordered by price
Motor insurance		4 consistently ordered by annual premium
	7	2 mainly ordered by annual premium and 1 mainly ordered by monthly premium (however, both appeared to be driven by the shopper's payment requirements)
Energy		5 ordered by estimated level of saving
	8	2 ordered on yearly bill / projection
		1 mainly ordered by yearly bill
Hotels	15	10 ordered by recommendation
	13	5 ordered on other factors
Broadband		9 ordered by price
	15	5 consistently ordered by price or top picks / deals
		1 ordered results depending on the shopper choices
Credit cards		0 consistently listed by representative APR
	15	7 listed by representative APR at times
	. •	8 listed by other factors (eg balance transfer offer, likelihood of being accepted)

5.3 Is it possible for consumers to filter and/or re-order results?

- 167. Filtering and re-ordering allow consumers to refine results to their own specific needs and, therefore, these functions facilitate the comparison process. Filtering allows consumers to set which results appear on the site (e.g. only credit cards offering cash-back) and re-ordering allows consumers to change the initial ordering of results according to their chosen factor (e.g. from lowest to highest monthly premium in motor insurance).
- As the tables below show, there was considerable variation between sectors: in some sectors all DCTs allowed customers to filter and reorder, and by the same variables; while in other sectors there was little or no consistency between DCTs.



Table 10: Overview of DCT filtering by sector.

Sector	Number of DCTs assessed	Number of DCTs allowing filtering	Main filtering options allowed.
Energy	8	8	8 allowed filtering on payment options plus at least one other factor
			14 allowed filtering on the departure time plus at least one other factor
Flights	15	14	13 allowed filtering on the number of stops
			13 allowed filtering on 'direct flights'
Hotels	15	13	13 allowed filtering on tourist rating, plus at least one other factor
			11 allowed filtering on price
Credit cards	15	12	12 allowed filtering on benefits / rewards / cashback plus at least one other factor
Broadband	15	9	8 allowed filtering on broadband provider plus at least one other factor
Bioaubanu	15	9	8 allowed filtering on broadband speed plus at least one other factor
			Variation across DCTs in filtering options
Motor insurance	7	4	2 allowed filtering on total excess value
Motor insurance	,	4	2 allowed filtering on cover type
			2 allowed filtering on additional cover
Home insurance	15	3	Variation across DCTs in filtering options
Tionie insulance	13	3	2 allowed filtering on additional cover



Table 11: Overview of DCT re-ordering by sector.

Sector	Number of DCTs assessed	Number of DCTs allowing re-ordering	Main re-ordering options allowed.
Broadband	45	45	15 allowed re-ordering on monthly price plus at least one other factor
	15	15	13 allowed re-ordering on broadband speed
			13 allowed re-ordering on contract length
Hotels	15	13	13 allowed re-ordering on price plus at least one other factor
			11 allowed re-ordering on tourist rating
Flights			12 allowed re-ordering on price plus at least one other factor
	15	12	11 allowed re-ordering on journey duration
			11 allowed re-ordering on departure time
Credit cards	15	11	10 allowed re-ordering on Representative APR plus at least one other factor
			Variation can be caused by the filters used
Home insurance	15	10	6 allowed re-ordering on annual premium, but no other factors
	13	10	4 allowed re-ordering on annual premium, plus at least one other factor
Motor insurance	7	3	3 allowed re-ordering on annual premium, plus at least one other factor
Energy	8	0	N/A

- In **energy**, all eight DCTs assessed allowed shoppers to filter their results, but none allowed them to reorder the results differently. However there were some differences in terms of the product dimensions that could be used to filter results. All DCTs allowed shoppers to filter on payment options, however only one allowed filtering on the yearly bill or on the estimated level of saving.
- All but one of the 15 DCTs in the **flights** sector allowed filtering, and all but three allowed re-ordering. Of these, one DCT did not allow re-ordering or filtering, and two DCTs did not allow the re-ordering of results. All 12 DCTs allowing re-ordering allowed shoppers to re-order on price, however only one allowed re-ordering on the airport to fly from / to. All 14 DCTs allowing filtering allowed shoppers to filter on departure time (outbound/inbound) and 13 of the 14 DCTs allowed filtering on the number of stops.
- The majority of DCTs in the **hotels** sector (13/15) allowed filtering and the same number allowed reordering. As shoppers from one travel DCT were directed to another DCT, shoppers stated that no filtering or reordering was possible on the original site. All 13 DCTs allowing re-ordering allowed shoppers to re-order on price and 11 of the 13 DCTs allowing filtering allowed shoppers to filter on price; whilst all 13 allowed filtering on tourist rating.
- In **credit cards** 12 out of 15 DCTs allowed filtering (including all 12 allowing filtering on 'benefits / rewards / cashback') and 11 DCTs allowed re-ordering. Two DCTs did not allow either re-ordering of filtering. In addition, the product dimensions by which shoppers could re-order the results differed by DCT and, in some cases, changed according to the selected filter.



- 173. For example, on one DCT for credit cards, when the shopper filtered the results on '0% balance transfer credit cards' the re-ordering options were:
 - Balance transfer period
 - Transfer fee
 - Representative APR
 - Total cost
 - Repayment period.
- However, when the shopper filtered the same site on 'air miles credit cards' the re-ordering options were factors such as rewards or 'purchase offer period'.
- 175. Filtering was slightly less common in the **broadband** sector (9/15), although all 15 DCTs in the sector allowed re-ordering, including all 15 DCTs allowing re-ordering on monthly price.
- In the **insurance** sectors the proportion of DCTs allowing filtering and reordering was lower than in other sectors. In **motor insurance**, just over half of the DCTs (4/7) allowed filtering and just under half (3/7) allowed reordering with all 3 allowing re-ordering on annual premium. **Home insurance** was the sector with the lowest proportion of DCTs allowing filtering (3/15). 10/15 DCTs did allow reordering, with all 10 allowing re-ordering on annual premium. One did allow filtering (although only on monthly and annual premium), but not re-ordering; and four DCTs in total did not allow either re-ordering or filtering.

5.4 Is an explanation of technical terms provided?

- 177. In addition to assessing how the results were ranked and re-ordered / filtered, shoppers were also instructed to assess whether an explanation of technical terms was provided. The responses to this question were largely based on shopper interpretation in terms of (a) whether they could see information relating to technical terms and (b) how each individual shopper defined 'technical terms'. This latter point is particularly important, as not every DCT used the terminology of 'technical terms'.
- 178. Because this task was much more subjective than the other ones, in the absence of any simple definition that could be given to shoppers of what exactly constituted "technical terms" there was, not surprisingly, more variation in assessments of the same DCTs than on the other tasks described previously. The differences were greater than a simple case of four assessments within a particular DCT reporting one finding, and a lone one reporting a different finding because of special circumstances. Because of the extent of the differences in this section we present results based on assessments rather than on DCTs.
- 179. It may be expected that DCTs in the hotel and flights sectors would be less likely to use and thus need to explain technical terms, whereas DCTs in potentially more complex sectors such as insurance would be more likely to do so.
- In thirteen of the fifteen DCTs in **home insurance**, at least one assessment per DCT indicated that an explanation of 'technical terms' was provided. There were no assessments where an explanation of technical terms was seen on two of these DCTs. However, there was no unanimity of findings: there wasn't a single DCT in this sector where all assessments reported the same finding, indicating clearly the point made above that the provision of technical terms was not necessarily clear.



- 181. In credit cards, there were four DCTs where all assessments reported that there was no explanation of technical terms but, as with home insurance, even where at least one assessment indicated that the DCT provided technical terms there was variation across assessments for the same DCT.
- More than half of the DCTs in the **broadband** and **motor insurance** sectors had at least one assessment reporting that the DCT explained 'technical terms'. Using the same criterion of at least one assessment reporting an explanation, this proportion dropped to a half (4/8) in the **energy** sector, four in ten (6/15) in the **hotels** sector and only one in five (3/15) in the **flights** sector.
- In summary (Table 12), whilst the analysis of technical terms was largely based on shopper interpretation it is clear that in all sectors many shoppers did not identify any explanations of technical terms. Where shoppers did identify any, they were more prevalent in the financial services and utilities markets, where terms that are generally less familiar to consumers are more commonly used. However, even in these sectors, there were DCTs where no technical terms were recorded at all.

Table 12: Overview of whether DCTs explained technical terms by sector.

Sector	Number of DCTs assessed	Number explaining technical terms in at least one assessment	Number explaining technical terms in majority of assessments
Home insurance	15	13	4
Credit cards	15	11	2
Broadband	15	11	3
Motor insurance	7	4	2
Energy	8	4	3
Hotels	15	6	1
Flights	15	3	0

5.5 Do DCTs display advertising or provide incentives?

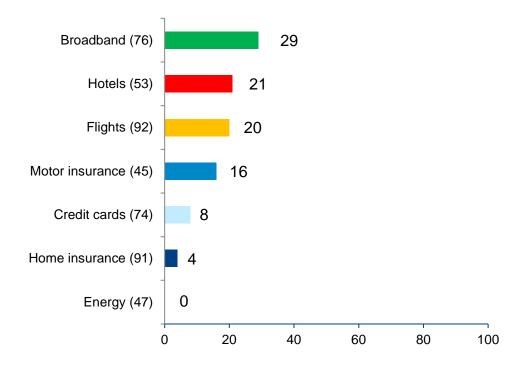
Shoppers were also instructed to assess whether any advertising (in the form of recommended, featured / paid-for results), or incentives (such as cashback or rewards), were displayed by DCTs. Because these results could vary considerably depending on the inputs of users (including information collected passively on their past browsing behaviours), they were analysed as a proportion of the assessments as opposed to the proportion of DCTs. Overall, the display of recommended, featured / paid for results, and the use of incentives varied substantially across sectors (Figures 23 and 24).

Advertising

Broadband was the sector where shoppers found the most advertising – for just under a third of the assessments carried out (29%) shoppers indicated seeing featured or paid-for results (Figure 23).



Figure 23: Differences between sectors in the use of recommended, featured or paid-for results.



Note: Do you notice 'recommended', 'featured' or 'paid for' results on the results page of the comparison website/app? Base: Percentage of assessments per sector (base sizes shown in brackets)

Incentives

Likewise, the broadband sector was where the highest proportion of shoppers, just over a third (34%), indicated that incentives were displayed (Figure 24).²⁵

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²⁵ The question relating to 'incentives' was not asked in the flights sector.



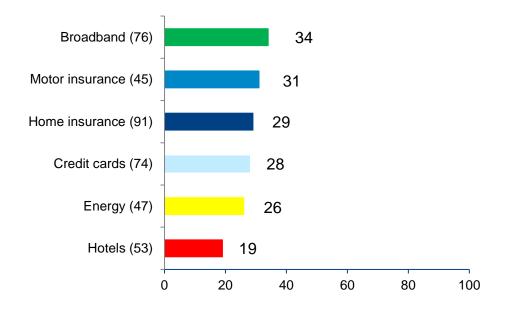


Figure 24: Differences between sectors in the use of incentives.

Note: Does it appear that any quotes offer an incentive for choosing that particular supplier/product (such as cashback or rewards)?

Base: Percentage of assessments per sector (base sizes shown in brackets)

- 187. Whilst it is important to analyse the data at an assessment level, it is also important to view the data at a DCT level in the sectors (including whether some shoppers reached different conclusions when looking at the same DCT).
- Two DCTs in the **broadband** sector displayed featured or paid-for results in every assessment, whilst six did not display any advertising in any of the assessments. In the case of incentives, some shoppers noted that a site offered incentives, whereas other shoppers looking at the same site did not identify any incentives. No site was identified as having offered incentives in every single assessment of it. A large number of different incentives were offered including a £125 reward incentive and free equipment (e.g. routers, TV, laptops, introductory money-off, SIM offers).
- 189. In the **hotels** sector, displayed featured / paid for results were reported in 21% of the assessments and incentives in 19% of assessments. For a number of DCTs neither type of advertising was reported. Incentives included savings, nectar points and extra nights.
- 190. In the **flights** sector, one in five (20%) assessments reported featured / paid for results. There were five DCTs where no advertising was seen and one site where shoppers in five of the six assessments reported featured / paid for results.
- 191. In the **insurance** and **credit card** sectors, only a small proportion of assessments indicated featured or paid-for results, however a higher number of assessments identified 'incentives offered'.
- 192. In **motor insurance** 31% of assessments reported incentives offered across four out of the seven DCTs and the types of incentives included free MOT²⁶, breakdown and discounts. In **home insurance**, 29% of

²⁶ A compulsory annual test for safety and exhaust emissions of motor vehicles of more than a specified age.



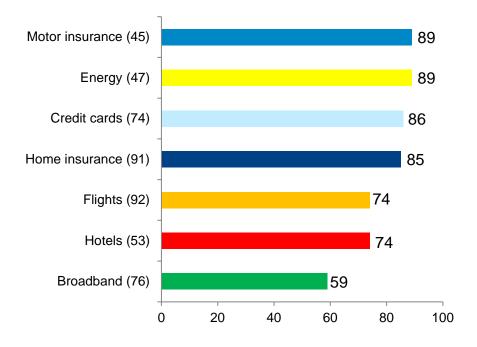
assessments reported incentives across nine of the fifteen DCTs, with the main incentives including cashback, free legal protection and Now TV.

- 193. In **credit cards**, 28% of assessments reported incentives across eleven of the fifteen DCTs. Incentives in this sector included loyalty points, free tickets and airmiles.
- 194. Finally, no assessment indicated featured / paid for results in the **energy** sector, whilst 26% reported incentives across five of the eight DCTs. The type of incentives offered in this sector were rewards (eg vouchers), gifts and cinema tickets.
- 195. In summary, the approaches vary in how DCTs use paid-for results and incentives; and whilst the use of these features was more prevalent in certain sectors (e.g. broadband) there were differences between DCTs and, indeed, between assessments of the same DCTs depending on the quotes that were displayed.

5.6 Are the results consistent with the search criteria?

196. Finally, shoppers were asked whether the results shown on the result pages were consistent with their search criteria.

Figure 25: Differences between sectors in terms of whether shoppers could match their scenario to a quote.



Note: Can you find the quote that matches your needs in your allocated scenario?

Base: Percentage of assessments per sector (base sizes shown in brackets)

197. Every shopper was instructed to follow a specific scenario, based on a number of factors relevant to the product / service they were searching for. In the majority of assessments carried out in each sector, shoppers were able to find a quote that matched their needs as described in their scenarios. However in some assessments across each sector shoppers did not find any suitable quote. It is difficult to design scenarios, that can work in all circumstances and in some cases, this may have reflected how the scenarios were designed.



Motor insurance

In the motor insurance (MI) sector, shoppers in five assessments (i.e. 11% of all assessments) said that they could not find a quote that matched their scenario across three DCTs. Those assessments where the shopper couldn't match their scenario were spread across the scenario types, however all reasons related to the shopper not being able to match requirements in terms of 'voluntary excess' (Table 13).

Table 13: Number of MI assessments where the shopper could not match their scenario.

Scenario	Number of assessments	Number of non- matching assessments	Reason for quote not matching the scenario
Scenario 1 (You want fully comprehensive car insurance and a voluntary excess of £250. The insurance is for you only and you want to pay a lump sum up front as opposed to monthly instalments)	13	1	Unable to find a quote which had a voluntary excess of £250
Scenario 2 (You want 3rd Party Fire & Theft for your car and a voluntary excess of £250. The insurance is for you and your partner. You want to pay monthly)	7	1	Website does not allow adjustment of voluntary excess
Scenario 3 (You want fully comprehensive car insurance and a voluntary excess of £100. The insurance is for you and your partner. You want to pay monthly)	6	0	
Scenario 4 (You want fully comprehensive car insurance and a voluntary excess of £250. The insurance is for you only and you want to pay monthly)	6	1	Not offered the required voluntary excess of £250
Scenario 5 (You want 3rd Party Fire & Theft and a voluntary excess of £500. The insurance is for you and your partner. You want to pay a lump sum up front as opposed to monthly instalments)	6	2	Did not allow the voluntary excess to be set.
Scenario 6 (You want fully comprehensive car insurance but no voluntary excess. The insurance is for you only and you want to pay a lump sum up front as opposed to monthly instalments)	7	0	



Home insurance

- 199. In the home insurance (HI) sector, shoppers in 14 assessments (i.e. 15% of all assessments) were unable to match their scenario with a quote, across nine DCTs. The reasons can be grouped into three categories, as follows:
 - Not being able to match voluntary excess requirements (8 assessments)
 - Not being able to find a quote that offered home emergency cover (3 assessments)
 - No reference to a £500 laptop (3 assessments)
- 200. The assessments where the shopper could not match their scenario were spread across all six scenario types (Table 14).

Table 14: Number of HI assessments where the shopper could not match their scenario.

Scenario	Number of assessments	Number of non-matching assessments	Reason for quote not matching the scenario
Scenario 1 (You are looking for contents insurance for your home, including your laptop (valued at £500). You want to include a voluntary excess of £200 and want to pay monthly)	24	3	No reference to a £500 laptop
Scenario 2 (You are looking for building & contents insurance for your home. You want to include a voluntary excess of £100 for buildings and £50 for contents. You want accidental damage cover to be included and want to pay monthly)	14	4	Voluntary excess requirements could not be matched
Scenario 3 (You are looking for building & contents insurance for your home. You also want to insure your TV (valued at £1,100) but nothing else is worth over £1,000. You want to include a voluntary excess of £200 for buildings and £100 for contents)	14	1	Voluntary excess requirements could not be matched
Scenario 4 (You are looking for contents insurance for your home including your bike (worth £300) when it's out of the home. You want to include a voluntary excess of £50 and want to pay a lump sum for the year up front)	16	1	Voluntary excess requirements could not be matched
Scenario 5 (You are looking for contents insurance for your home and a diamond ring (worth £2,000). You do not have any other possessions worth over £1,000. You want to include a voluntary excess of £150 and want to pay a lump sum for the year up front)	11	1	Voluntary excess requirements could not be matched
Scenario 6 (You are looking for building & contents insurance for your home. You want to include a voluntary excess of £200 for buildings and contents and a home emergency cover in your policy. You want to pay a lump sum for the year up front)	12	4	Home energy cover could not be matched (3) Voluntary excess could not be matched (1)



Energy

201. In the energy sector, shoppers in 5 assessments (i.e. 11% of all assessments) could not match a quote to their needs, across five DCTs and across three of the six scenarios as follows, based on a number of reasons specific to each scenario (Table 15).

Table 15: Number of energy assessments where the shopper could not match their scenario.

Scenario	Number of assessments	Number of non- matching assessments	Reason for quote not matching the scenario
Scenario 1 (You want a dual fuel (gas and electricity) energy supplier for your address. You want to pay by monthly direct debit)	11	0	
Scenario 2 (You want a dual fuel (gas and electricity) energy supplier for your address. You currently have a prepayment meter and wish to continue to pay by prepayment meter)	6	0	
Scenario 3 (You want an electricity supplier for your address and you want to pay by quarterly direct debit)	7	0	
Scenario 4 (You want a gas provider for your address. You want a one year fixed term tariff with no exit fees. You want to pay on receipt of bill - i.e. not by direct debit)	7	2	No offer fixed for 1 year, with no exit fees, unable to choose an option of quarterly cash/cheque (to avoid direct debit) and all of quotes had early exit fees
			Could not select length of contract
Scenario 5 (You want a dual fuel (gas and electricity) energy provider for your address. You want to pay by monthly direct debit. You would like a tariff which supports the Warm Home Discount and has paper bills)	8	2	Could not find the warm home discount scheme
Scenario 6 (You want a dual fuel (gas and electricity) energy provider for your address. You want to pay on receipt of your bill (i.e. not by direct debit) and would like a green or environmental tariff)	8	1	No mention of green or environmental tariffs, nor dual fuel



Credit cards

202. In the credit cards (CC) sector, shoppers in 10 assessments (i.e. 14% of all assessments) could not match a quote to their allocated scenario, across six DCTs (including all three assessing one site) and across all five scenarios, although most prevalent in two:

Table 16: Number of CC assessments where the shopper could not match their scenario.

Scenario	Number of assessments	Number of non- matching assessments	Reason for quote not matching the scenario
Scenario 1 (You want to get a credit card with an interest-free deal on new purchases. You're looking for the card that has the longest 0% offer period)	23	1	The DCT did not show charges
Scenario 2 (You want to get a credit card that offers cashback on purchases and you're looking for the lowest APR)	14	1	Could find cashback offers, but no information on APR
Scenario 3 (You have existing credit card debt and you want to transfer the balance to a new credit card. You're looking for 0% interest on transfers (usually for a fixed time)	13	1	The quotes were generic and were not displayed according to what they offered but according to what the site offers as cashback
Scenario 4 (You travel abroad frequently and you want to get a new credit card with favourable terms for overseas use (e.g. a good rate on foreign purchases)	13	4	No option for travel / foreign purchases (2) None of the quotes matched (2)
Scenario 5 (You want a credit card to make regular purchases and wish to earn airmiles on purchases. You intend to repay in full each month)	11	3	Couldn't find air miles Could not search using 'regular purchases' or full monthly repayment Filters not appropriate to accurately find the information required.



Travel

- 203. In the flights and hotels sectors, the proportion of assessments where shoppers did not find a match to their needs was greater than in all other sectors except broadband.
- 204. In **flights**, shoppers in 24 assessments (26% of all assessments) stated they could not match their scenario. This was across all DCTs (with the exception of 2 DCTS, where all quotes were matched) and across five of the six scenarios (Table 17).

Table 17: Number of flights assessments where the shopper could not match their scenario.

Scenario	Number of assessments	Number of non-matching assessments	Reason for quote not matching the scenario
Scenario 1 (You want 1 adult ticket to (any airport) on Monday, 24 July 2017 between 1000 and 1100 from any London airport returning on Monday, 31 July 2017 after 1730. You want a nonstop flight and to check in a single item of baggage - up to 20kg)	19	4	No outbound flight at the hours required (2) No option to choose 'any' destination airport (1) No option to choose baggage allowance (1)
Scenario 2 (You want 2 adult tickets from any London airport to (any airport) on Friday, 3 February 2017 after 1730 and returning on Sunday, 5 February 2017 after 1730. You desire non-stop flights. You don't need to check in any luggage)	14	0	
Scenario 3 (You want 1 adult, 3 children and 1 infant tickets from London Gatwick leaving after 0930 to (any airport) on Saturday, 22 July 2017. You want to return from/to the same airport leaving before 1900 on Sunday 13 August 2017)	14	1	It was not possible to amend and select the appropriate times.
Scenario 4 (You want 2 return adult tickets from Birmingham to Bangkok departing on Sunday, 26 March 2017 and returning on Thursday, 6 April. You would like one layover on the way out and one on the way back of at least 12 hours)	17	6	No best fit for the layover requirements (2) Could not filter minimum layover duration (2) Could not amend baggage needs, in addition to layover issues (2)
Scenario 5 (You want 1 fully flexible adult ticket from (any airport) to London City Airport leaving before 0800 on Wednesday, 14 December 2016. You want a return flight from London Heathrow, leaving between 1800 and 1900)	14	7	Unclear how to book a return flight from another airport (3) No flight leaving from Heathrow at that time (2) No option for fully flexible (1) No flight departing before the specified time (1)
Scenario 6 (You want 1 adult ticket for 2017 Easter holiday from (any airport) to Bristol leaving after 0930. You want to stay for a week and are happy to fly any days between Wednesday, 12 April 2017 and Saturday, 22 April 2017)	14	6	Could not match the baggage requirements (4) No non-stop flights between the airports selected by the shopper (2) ²⁷

²⁷ In these cases, the shoppers chose departure airports but could not find direct flights and therefore recorded the scenarios as being unavailable (in effect adding some additional realism to the scenario).



205. In **hotels**, shoppers in fourteen assessments (26% of all assessments) could not match their scenario across nine DCTs and all three scenarios; with the main reasons relating to free cancellation and breakfast (Table 18).

Table 18: Number of hotel assessments where the shopper could not match their scenario.

Scenario	Number of assessments	Number of non- matching assessments	Reason for quote not matching the scenario ²⁸
Scenario 1 (You want to book a double room (including breakfast) for 2 adults for 2 nights (a Friday and Saturday) in Brighton at any time during March 2017. You want at least a four star hotel but value for money is important)	21	5	Do not offer free cancellation or breakfast (2) Did not offer free cancellation (1) Did not offer free breakfast (1) Could not determine the cancellation period (1)
Scenario 2 (You want to book a room (without breakfast) for 1 adult for 3 nights covering 3, 4, 5 March 2017 in any location. You want a least a three star hotel)	15	3	Unable to find free cancellation and breakfast (2) Unable to find free cancellation (1)
Scenario 3 (You want to book 3 double rooms (including breakfast) for a total of 6 adults for 5 nights in Las Vegas in September 2017. You wish to be in Las Vegas for the weekend of 16/17 September 2017 but are flexible on arrival and departure dates)	17	6	No free cancellation (2) No 4 star hotels offering free cancellation (2) No hotels in Las Vegas (1) Could not search on 6 travellers (1)

206. Finally, as indicated above, broadband was the sector where, in the highest number of assessments, shoppers were unable to find a match for their scenarios. In 31 assessments (41%) shoppers could not find a match for their scenario and furthermore there were no DCTs where all shoppers assessing them found that their scenario could be matched. A wide range of reasons were given by shoppers including issues relating to broadband speeds, packages not including sports, no options for one month contracts, no international calls, no packages with unlimited calls. However, broadband is the sector where the least personal information is requested by DCTs and whilst all DCTs in the broadband sector allow consumers to re-order their results (with the majority allowing for filtering) it was not always possible for shoppers to match their scenario exactly with a quote, as follows:

²⁸ As with some flights assessments, in some cases the shoppers chose to add some additional requirements – in particular free cancellation.



Table 19: Number of broadband assessments where the shopper could not match their scenario.

Scenario	Number of assessments	Number of non-matching assessments	Reason for quote not matching the scenario
Scenario 1 (You want home broadband with unlimited data downloads and an advertised download speed of at least 30 mb/s. You require a 12 month contract)	24	4	Could not match the speed (4)
Scenario 2 (You want a package including fixed line telephony (with weekend calls) and home broadband with unlimited data downloads and an advertised download speed of at least 17 mb/s. You want a one month contract only)	13	8	No one month contracts available (7) Month contract available, but not for the required package (1)
Scenario 3 (You want a package including fixed line telephony (with anytime calls), home broadband (with unlimited data downloads and an advertised download speed of at least 30 mb/s), and a Sky Atlantic TV package. You require an 18 month contract)	13	3	Could not find package with unlimited calls (1) Could not find a Sky Atlantic option (2)
Scenario 4 (You want a package including some international calls from your fixed line to Sweden (but not any other calls), and home broadband with unlimited data downloads and an advertised download speed of at least 76 mb/s. You require an 18 month contract)	14	7	Could not find or were unclear about international calls (7)
Scenario 5 (You want a package including home broadband with unlimited data downloads and an advertised upload speed of at least 9 mb/s, and a BT sport TV package which includes all European Champions League football matches. You require an 18 month contract)	12	9	Couldn't find the correct package for 18 months (6) The 'closest' package was not unlimited (1) Speed information not available on app (1) Could not find BT sport (1)

207. In summary, whilst the majority of shoppers were able to match their scenario, a proportion of shoppers could not. In general, the reasons for not being able to match the quote were related to the shopper's scenario.



5.7 What are the most common brands shown on DCT results pages?

- 208. GfK used the screenshots of the result pages taken by shoppers during their assessments to calculate within each sector, and at an aggregated level, which providers' brands were most commonly shown among the top 10 results.
- 209. There were occasions where the number of results provided was less than ten and in some cases the screenshots provided by shoppers were cut off or unclear. However, by combining the number of quotes on the results pages across the initial visits, the 'share of top 10 quotes' data is based on the following overall numbers:
 - Home insurance 852 quotes
 - Broadband 599 quotes
 - Credit cards 555 quotes
 - Motor insurance 439 quotes
 - Energy 414 quotes
 - Hotels 464 quotes
- 210. In the flights sector, the analysis of the common brands was not possible due to the number of variations and different airlines being used for the same journey, but using non-direct flights.
- 211. In addition, to understand whether the providers' brands more often displayed on the DCTs' result pages were among the largest brands in each sector, GfK calculated market shares on the basis of two datasets:
 - The Financial Research Survey (FRS) this GfK flagship consumer survey, looks at the behaviour of consumers in the financial services sector, drawing on 60,000 interviews per annum, based on a representative sample of the 18+ Great Britain population. The survey covers all main financial retail markets (including banking, savings and investments, lending, insurance and retirement planning) and covers brand share, consumer behaviour and a wealth of demographic information. The data covers a range of sectors including home insurance, motor insurance and credit cards. FRS figures have been used when comparing the mystery shopping data in these three markets.
 - GfK Consumer Panels our consumer panel data is based on regular interviews with a panel of 10,000 consumers exploring their shopping behaviour, how they find new products, how products are researched and compared and the factors that drive the decision making and path to purchase. The data covers a range of sectors including energy. Consumer Panels figures have been used when comparing the mystery shopping data in the energy sector only.
- 212. For the broadband, flights and hotels sectors, GfK does not have market share data and for these markets we provide details only of the Top 10 providers shown on the DCTs.
- 213. In the analysis below, the first table for each sector shows the extent to which the top 10 brands based on the mystery shopping match the top 10 brands for market share. The first column shows each provider's share of the aggregated top 10 quotes from the assessments, while the second column shows each of these providers' share of the market as a whole (based on the FRS or Consumer Panel data discussed above). The second table for each sector shows the extent to which the top 10 brands based on market share appear in the mystery shopping assessments. In these tables the first column shows their market share from the FRS or consumer panel, while the second column shows each brand's share of the top 10 brands based on the mystery shopping.



214. In some sectors some of the largest brands in terms of market share do not appear in the mystery shopping Top 10 at all, and this is entirely or largely because some major brands are not listed on DCTs as a matter of policy. These brands are shown in the tables below as N/A.

Home insurance

- 215. In home insurance, eight of the top ten brands based on the mystery shopping data have, individually, less than 1% share of the home insurance market. The two biggest brands by overall market share that were often displayed in the result pages were 'Brand 2' (with 5.8% share of the aggregated mystery shopping data) and 'Brand 9' (with 3.1%). This provides a broad indication that smaller providers appear to be more prevalent on DCTs than larger ones. This may reflect the fact that some of the largest in terms of brand share do not appear at all on DCTs, but it is also worth noting that this is a very dispersed market, with the overall brand leader holding only a 3.4% market share.
- One home insurance brand states that their insurance policies are not available on DCTs; however based on the mystery shopping they do appear on two DCTs. These DCTs do not allow click-throughs to the provider site in the household insurance market.

Table 20: Brands ranked on share of Top 10 quotes from the mystery shopping, compared to FRS market share (home insurance)

Top 10 brands – Mystery Shopping	Share of top 10 quotes – Mystery Shopping	FRS market share
Brand 1	8.7%	<1%
Brand 2	5.8%	1.7%
Brand 3	4.2%	<1%
Brand 4	4.2%	<1%
Brand 5	3.9%	<1%
Brand 6	3.8%	<1%
Brand 7	3.6%	<1%
Brand 8	3.5%	<1%
Brand 9	3.1%	2.0%
Brand 10	2.8%	<1%



Table 21: Brands ranked on share of market (FRS), compared to share of Top 10 quotes from the mystery shopping (home insurance)

Top 10 brands (FRS)	FRS market share	Share of top 10 quotes – Mystery shopping
Brand 1	3.4%	2%
Brand 2	3.1%	1.1%
Brand 3	3%	N/A
Brand 4	3%	0.7%
Brand 5	2.1%	0.5%
Brand 6	2.0%	0.2%
Brand 7	2.0%	3.1%
Brand 8	1.9%	N/A
Brand 9	1.8%	0.7%
Brand 10	1.8%	N/A

Motor insurance

- In motor insurance, two of the top three brands based on the mystery shopping data ('Brand 1' and 'Brand 3') were also top 5 brands based on overall market share. However, no other brand within the top 10 most common brands on DCTs' result pages accounted for more than a 1.3% share of the *overall* market (as per Table 22 below).
- 218. Six of the top 10 largest providers in the market as a whole ('Brand 1', 'Brand 4', 'Brand 5', 'Brand 7', 'Brand 9' and 'Brand 10') also had a greater than 1% share each based on the aggregated mystery shopping data (as per Table 21) though only 'Brand 1' and 'Brand 5' also appeared in the Top 10 in the mystery shopping.
- 219. This indicates that the major providers of motor insurance appear to be more prevalent on DCTs than the equivalent brands in home insurance, but also indicates that smaller providers are still common-place across DCTs.

Table 22: Brands ranked on share of Top 10 quotes from the mystery shopping, compared to FRS market share (motor insurance)

Top 10 brands – Mystery Shopping	Share of top 10 quotes – Mystery Shopping	FRS market share
Brand 1	7.1%	4.2%
Brand 2	5.7%	<1%
Brand 3	4.6%	5.6%
Brand 4	3.4%	<1%
Brand 5	3.2%	<1%
Brand 6	3.0%	<1%
Brand 7	2.7%	<1%
Brand 8	2.3%	1.3%
Brand 9	2.1%	<1%
Brand 10	2.1%	<1%



Table 23: Brands ranked on share of market (FRS), compared to share of Top 10 quotes from the mystery shopping (motor insurance)

Top 10 brands (FRS)	FRS market share	Share of top 10 quotes – Mystery shopping
Brand 1	5.6%	4.6%
Brand 2	5.0%	N/A
Brand 3	4.5%	N/A
Brand 4	4.4%	1.8%
Brand 5	4.2%	7.1%
Brand 6	3.3%	0.7%
Brand 7	3%	1.4%
Brand 8	2.5%	0.7%
Brand 9	2.2%	1.1%
Brand 10	2.1%	1.8%

Credit cards

220. In the credit card sector there are fewer brands in the market than in home and motor insurance. As such, there are fewer differences between the most common brands listed on result pages and the largest brands in the overall market. Six of the top 10 brands presented in the mystery shopping data have a share of over 6% in the market as a whole, and even the smallest brand in the top 10 mystery shopping results had a share of the overall market of 1.7%. Therefore, in the credit cards sector the brands shown on DCTs' results pages are more representative of the market as whole when compared to the insurance

Table 24: Brands ranked on share of Top 10 quotes from the mystery shopping, compared to FRS market share (credit cards)

Top 10 brands – Mystery Shopping	Share of top 10 quotes – Mystery Shopping	FRS market share
Brand 1	8.8%	3.0%
Brand 2	8.7%	11.7%
Brand 3	6.9%	2.0%
Brand 4	6.1%	1.7%
Brand 5	5.8%	25%
Brand 6	5.6%	8.9%
Brand 7	5.4%	12.1%
Brand 8	5.1%	10.8%
Brand 9	4.9%	6.6%
Brand 10	4.5%	1.9%



Table 25: Brands ranked on share of market (FRS), compared to share of Top 10 quotes from the mystery shopping (credit cards)

Top 10 brands (FRS)	FRS market share	Share of top 10 quotes – Mystery Shopping
Brand 1	25%	5.8%
Brand 2	12.1%	5.4%
Brand 3	11.7%	8.7%
Brand 4	10.8%	5.1%
Brand 5	8.9%	5.6%
Brand 6	8.8%	2.0%
Brand 7	8.5%	0.5%
Brand 8	7.6%	0.2%
Brand 9	7.6%	4.3%
Brand 10	6.6%	4.9%

Energy

221. In the energy sector, where fewer providers are present than in insurance, eight of the top ten brands, according to the mystery shopping data, had a share of less than 1% in the market as a whole. However, two of the Big 6 providers ('Brand 3' and 'Brand 6') did appear in the top six brands in the mystery shop. Therefore, whilst it appears that smaller brands were particularly likely to appear in the top 10 results, some larger brands also appeared.

Table 26: Brands ranked on share of Top 10 quotes from the mystery shopping, compared to Consumer Panels market share (energy)

Top 10 brands – Mystery Shopping	Share of top 10 quotes – Mystery Shopping	Consumer Panels market share
Brand 1	11.6%	<1%
Brand 2	9.7%	<1%
Brand 3	8.2%	11% (Elec. & Gas)
Brand 4	7.5%	<1%
Brand 5	5.1%	<1%
Brand 6	4.6%	13% (Elec.) / 11% (Gas)
Brand 7	4.4%	<1%
Brand 8	4.4%	<1%
Brand 9	3.9%	<1%
Brand 10	3.9%	<1%



Table 27: Brands ranked on share of market (Consumer Panels), compared to share of Top 10 quotes from the mystery shopping (energy)

Top 10 brands (Consumer Panels)	Consumer Panels market share	Share of top 10 quotes – Mystery Shopping
Brand 1	23% (Elec.) / 37% (Gas)	1.5%
Brand 2	16% (Elec.) / 11% (Gas)	0.2%
Brand 3	13% (Elec.) / 11% (Gas)	4.6%
Brand 4	11% (Elec.) / 11% (Gas)	8.2%
Brand 5	13% (Elec.) / 9% (Gas)	3.1%
Brand 6	9% (Elec.) / 8% (Gas)	2.9%
Brand 7	5% (Elec.) / 5% (Gas)	3.9%
Brand 8	4% (Elec.) / 4% (Gas)	0.7%
Others	6% (Elec.) / 4% (Gas)	75%

Broadband

In the broadband sector, where fewer providers are present than in insurance, the top five brands (based on the aggregated mystery shopping data) all had a share of over 9%.

Table 28: Brands ranked on share of Top 10 quotes from the mystery shopping, compared to Consumer Panels market share (broadband)

Top 10 brands – Mystery Shopping	Share of top 10 quotes – Mystery Shopping
Brand 1	16.5%
Brand 2	12.7%
Brand 3	11.2%
Brand 4	10.9%
Brand 5	9.2%
Brand 6	8.5%
Brand 7	7.0%
Brand 8	4.5%
Brand 9	4.3%
Brand 10	4.3%

Hotels

- 223. In the hotels sector, across the 530 quotes, there were 261 hotels. Where possible, hotels were combined into the major hotel groups.
- 224. Based on this data, market shares were as follows:



Table 29: Brands ranked on share of Top 10 quotes from the mystery shopping (hotels)

Top 10 brands – Mystery Shopping	Share of top 10 quotes – Mystery Shopping
Brand 1	5.0%
Brand 2	4.1%
Brand 3	3.0%
Brand 4	1.3%
Brand 5	0.9%
Brand 6	0.4%
Brand 7	0.2%
Brand 8	0.2%
Not part of a hotel group listed above	84.9%

Summary

- Care must be taken over the mystery shopping data in terms of the analysis of most common brands, due to (a) the fact that this research was conducted at a specific point of time (b) the calculations were based on mystery shoppers taking a screenshot of the Top 10 quotes, as opposed to all available quotes and (c) the relatively small base sizes. However, the data does provide an overview of the more commonly featured brands.
- In both the home and motor insurance sectors the most common 'Top 10' brands on the DCTs assessed in the mystery shopping were not reflective of the market as a whole, with smaller brands predominating, whilst in credit cards the most common 'Top 10' brands were more representative of the market as a whole (although fewer brands compete in the credit cards sector).
- 227. In the energy sector only two of the Big 6 brands were amongst the most common 'Top 10' brands on the DCTs assessed in the mystery shopping; and whilst market share in the broadband sector was not available, a small number of big brands dominated.
- 228. In the hotels sector, the number of hotel 'brands' presented was much more diverse, given the variety of destinations and the number of different hotels available in those destinations.

5.8 Section summary

- When analysing the presentation of results by DCTs it is important to note the differences by sector, whilst acknowledging the similarities where appropriate.
- When presenting results there are generally commonalities across DCTs within the same sector in terms of the 'core' product information that is displayed e.g. price, name of the provider. And, whilst many DCTs use a tabulated approach to display results, including columns with key 'product dimension' headings, the level of information that is displayed can sometimes depend on the quote itself. As such, different types of product information can be provided about different quotes on the same DCTs results page.
- 231. DCTs also employ different techniques in terms of re-ordering and filtering and, therefore, there are differences in how consumers can rank and, therefore, focus on the results that are most pertinent to their search.



- 232. There are also differences in the extent of explanations for technical terms and the use of advertising and incentives.
- 233. In general, the majority of shoppers were able to match their scenario with the results they received, although it some cases this was not always possible due to the specifics of the enquiry not matching (e.g. the requirement for breakfast at a hotel).



6 Step 4: Comparison between DCTs and providers (Mystery shop)

- 234. Once shoppers had assessed the results pages and taken the relevant screen-shots they were instructed to re-rank the results on the following factors:
 - Home insurance annual premium
 - Motor insurance annual premium
 - Broadband annual premium
 - Flights low to high prices
 - Hotels low to high prices
 - Credit cards representative APR
 - Energy monthly savings
- 235. On certain DCTs shoppers were unable to re-order their results (as highlighted in section 5.3) and, therefore, the choice of providers was based on how the results were shown initially.
- Following the re-ordering, shoppers were then instructed to pick three providers to assess and compare to the DCT's information, as follows:
 - The first choice of provider was entirely at the discretion of the shopper based on the quote that was most appealing to them. This could be a quote shown on the first results page or any subsequent page.
 - 2. The second choice of provider either had to be the first quote shown (if the shopper had not already picked it) or the second quote shown (if the shopper had picked the first ranked quote).
 - 3. The third choice of provider was dependent on the first two choices, but was either the second quote (if the shopper had chosen an initial quote outside of the top three and the top ranked quote) or the third quote (if the top two quotes had already been chosen).
- 237. The purpose of this approach was to ensure that the shopper made their preferred choice, but also to ensure that the top ranked quotes were also chosen.

6.1 What was the purchase route from the DCT to provider?

- 238. Once the shopper had decided which quotes to choose, they were instructed to provide feedback on the purchase journey.
- 239. The vast majority of shoppers were able to identify whether the purchase was to be made by clicking through to the provider site or by making the purchase on the DCT. However, in a small number of assessments the shoppers were unclear on the next steps and, as shoppers were not actually making a purchase, it was not always clear what the *actual* purchase journey was. Therefore, to a degree, the findings are based on shopper interpretation, although in the majority of cases site the process was clear and analysed.
- 240. In 3 of the 92 assessments in the **flights** sector, the shoppers undertaking the assessment stated they were unclear on the next steps. One shopper on one DCT was unclear about next steps as there was no obvious 'click-through' option; however other shoppers to this site were able to click on the price and go through to the provider site. Two shoppers were uncertain on next steps when using two other DCTs, although it was clear to the majority of shoppers that click-throughs were possible.



Figure 26: Redacted screenshot showing an example of a DCT in the flights sector where it was unclear to one shopper how to make the purchase.

241. In 10 of the 47 assessments in the **energy** sector, the shopper undertaking the assessment stated either that (a) they were either unclear on the next steps *or* (b) that they could not click through to make the purchase on a provider site nor purchase directly on the DCT. On one DCT there were options either to proceed via telephone or click on 'I want this tariff'. The site also shows the process for making the purchase (along the top bar) including what appears to be the requirement for consumers to ensure their details and confirm the switch via the DCT. As such, some shoppers were confused about how to proceed.

Figure 27: Redacted screenshot showing an example of a DCT in the energy sector where the purchase is either made by calling the provider or via the DCT.

In some circumstances, as per the redacted screenshot (Figure 28) the 'plan' was not made available by the provider, despite still being shown by the DCT.

Figure 28: Redacted screenshot showing an example of a DCT in the energy sector where the quote was shown, but was not available via the DCT.

243. For one DCT in the energy sector, shoppers were instructed to click-on 'next steps' as per the redacted screenshot (Figure 29). At that point they are told that the DCT could not progress the switch any further and shoppers were, therefore, either expected to visit the actual provider site separately or contact the provider over the telephone.

Figure 29: Redacted screenshot showing an example of a DCT in the energy sector where next steps are shown, following which the shopper could not proceed any further.

244. For another DCT in the energy sector (Figure 30), shoppers were either given the option to 'proceed' (and, therefore, purchase on the DCT) or contact the provider directly, based on the instruction 'sorry we can't switch you to this tariff'. In these cases the shopper was required to contact the DCT directly.

Figure 30: Redacted screenshot showing an example of a DCT in the energy sector where different purchase paths are required depending on the provider.

In the **credit cards** sector, the majority of shoppers were able to click through to the provider website. However, one shopper using one DCT stated that they were unable to click-through or purchase directly on the website and three shoppers across three different DCTs were unclear. Consumers have to signup to one DCT in order to move forward with the purchase and this may have been unclear to shoppers. For another DCT the term 'apply now' is used, as per the redacted screenshot (Figure 31) which resulted in the shopper being unclear about the next steps; and on another DCT the requirement for an eligibility check also confused the shopper in terms of next steps.



Figure 31: Redacted screenshots showing examples of DCTs in the credit cards sector where the next steps were not clear

Broadband (76) 100 Credit cards (74) 100 Motor insurance (45) Home insurance (91) 86 Flights (89) 36 64 Energy (37) 70 Hotels (53) 89 0 20 40 60 80 100 DCT ■ Provider

Figure 32: Differences between sectors in terms of the purchase journey

Note: When you selected the quote, do you go through to the provider's website/app or do you have to purchase the product/service on the comparison website/app?

Base: Percentage of assessments per sector, based on those clicking through to a provider (base sizes shown in brackets)

- 246. The data has been analysed in terms of the number of assessments (as opposed to the number of DCTs) and excludes those 17 assessments described above (four in credit cards, three in flights and ten in energy) where the shoppers were unclear on the next steps.
- 247. In every broadband and credit card assessment, the shopper was instructed to click through to the supplier site. This was slightly lower in motor insurance (93%), where certain sites allowed a mix of click-throughs and direct purchases, as follows:
 - Motor insurance Shoppers undertaking assessments on three DCTs stated that the product service
 had to be purchased on the DCT, whilst other shoppers to the same DCTs reported being able to
 make the purchase via the provider site.

Figure 33: Redacted screenshot showing an example of a DCT in the motor insurance sector where the purchase appears to be conducted directly via the DCT.

In home insurance, shoppers in 14% of assessments (13 assessments in total) stated that they were required to make the purchase on the DCT.



- 249. The process was more mixed in the energy, flights and hotels sectors as outlined below:
 - Flights in slightly under two thirds of assessments shoppers stated that they had to click-through to make the purchase. Certain DCTs appeared to only allow click-through, whilst others appeared only to allow purchases on the DCT. A small number allowed both approaches.
 - Energy no DCT that was assessed gave only click-through options, with DCTs either allowing both click-through and direct purchases or only direct purchases.
 - Hotels shoppers in only six assessments (11%) reported being required to make their purchase via the provider site (across two DCTs).
- 250. Generally DCTs used a wide range of terms in relation to next steps as follows:
 - Apply now
 - Switch
 - Proceed
 - Next steps
- 251. Once the purchase journey was established the shoppers were instructed to follow the instructions (where clear) in terms of either clicking through or making the purchase on the DCT; and assess the next steps of the journey.
- 252. For those <u>clicking through to providers</u> the following key research questions were covered:
 - Is the information from the DCT saved by providers?
 - Is additional information requested?
 - Was the original quote available?
 - Were additional quotes available on the provider site?
 - Do results on the provider sites match what was provided on the DCT?
 - What is the difference, where the price on the provider site differs from the DCT?
- 253. Each of these research questions are covered in the section below and the analyses based on the number of quotes / providers assessed rather than the number of shoppers / assessments, due to the fact that shoppers were instructed to assess three providers (where click-throughs were possible).

6.2 Is the information saved from the DCT saved by providers?

254. The data in this section is analysed by the proportion of providers, based on each assessment analysing up to a maximum of three providers. As such, the numbers are calculated as follows:

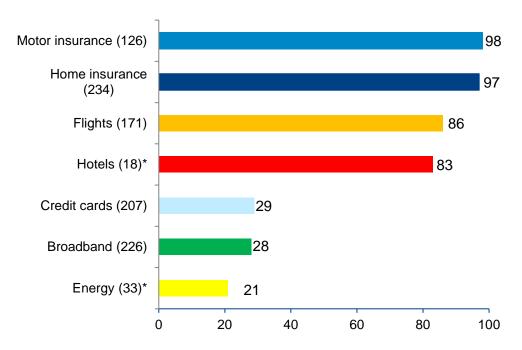


Sector	Number of assessments	Proportion of assessments clicking through to providers	Number of provider assessments
Home insurance	91	78 full click-throughs 13 purchased via DCT	234 (78 assessments x 3 providers)
Broadband	76	75 full click-throughs 1 click-through to one provider	226 (75 assessments x 3 providers) (1 assessment x 1 provider)
Credit cards	74	67 full click-throughs 3 click-through to two providers 4 unclear / couldn't do either action	207 (67 assessments x 3 providers) (3 assessments x 2 providers)
Flights	92	57 full click-throughs 32 purchased via DCT 3 unclear	171 (57 assessments x 3 providers)
Motor insurance	45	42 full click-throughs 3 purchased via DCT	126 (42 assessments x 3 providers)
Energy	47	11 full click throughs 26 purchased via DCT 10 unclear / couldn't do either action	33 (11 assessments x 3 providers)
Hotels	53	6 full click-throughs 47 purchased via DCT 18 (6 assessments x 3	
Total	478	336 full click-throughs to 3 providers 3 click-throughs to two providers 1 click-through to 1 provider	1,015 provider assessments

- 255. There were differences by sector in terms of the proportion of shoppers saying that the provider had not saved the details they entered into the DCT (Figure 34).
 - Home insurance of the 234 provider quotes that were assessed, for only 3% of quotes did shoppers state that their details had not been saved.
 - Motor insurance of the 126 quotes that were assessed, for only 2% of them did shoppers state that their details had not been saved.



Figure 34: Differences between sectors in the proportion of providers' sites where details were saved



Note: Has the provider saved all of your details entered on the comparison website/app?

Base: Percentage of the total number of providers' sites clicked-through to in each sector (base sizes shown in brackets)

*Base sizes are small in the hotels and energy sectors due to the high number of shoppers being instructed to make the purchase directly on the DCT and, consequently, the low number of shoppers who click through.

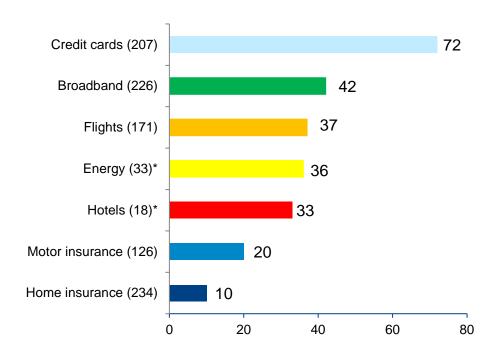
- This was, to a degree, based on shopper interpretation and even if only one piece of information did not appear to be saved a 'no' response may have been given. However, in general, following a click-through from a DCT, providers did save the details provided by consumers on the DCT. In the insurance sector, a high level of relevant information is requested in order for the DCT to ascertain the insurance products that are applicable; and this is equally applicable to the quotes on the provider sites hence the high proportion of assessments where the information was saved.
- 257. In terms of the travel sector, the majority of providers saved the shopper details, although not in every case.
- 258. In the remaining sectors (i.e. credit cards, broadband and energy) where less personal information is generally requested by DCTs it appears that in many cases the information that is provided by consumers whilst on the DCT is not necessarily saved upon clicking through to the providers' sites. As such, in these sectors a higher proportion of providers requested additional information, as outlined below.



6.3 Is additional information required?

259. There were differences by sector in terms of the proportion of provider visits where additional information was requested.

Figure 35: Differences between sectors in the proportion of providers' sites requiring additional information.



Note: Is any additional information required?

Base: Percentage of the total number of providers' sites clicked-through to in each sector (base sizes shown in brackets)

*Base sizes are small in the hotels and energy sectors due to the high number of shoppers being instructed to make the purchase directly on the DCT and, consequently, the low number of shoppers who click through.

Credit cards

In the credit cards sector, a number of reasons were outlined by shoppers where additional information was requested by providers. Typically, detailed personal information was requested:

'Full application details including name, address, phone, date of birth, income and employment.'

'All personal details (name, address etc.), employment details and bank account details were required.'

'Further personal details regarding expenditure and employment details.'

'I was asked for spending and expenditure, my Account number and sort code and what credit limit I would like.'

'I was asked my name, address & postcode and how long at address, date of birth, nationality, email, phone, detailed financial information and mother's maiden name.'



Energy

Only a small number of shoppers in energy clicked through to a provider and were asked for additional information. However, in those cases where additional information was requested shoppers said that they had to re-enter all details again. In one case, the shopper was unable to complete the quote online and was advised to call to complete their quote (Figure 36).

Figure 36: Redacted screenshot showing an example of a DCT in the energy sector where the shopper was unable to complete the quote on the provider website.

Broadband

262. In terms of the broadband sector additional information was requested in 42% of provider quotes, with some typical examples shown below; most commonly in relation to the shoppers' post-code and telephone number:

'The provider would need all my information as no information was transferred as far as I could see.'

'All information was required as the presented page had no personal information on it at all.'

'I had to re-enter my postcode and additionally my phone number.'

'I was asked for my post code, landline number and email address.'

'I needed to input postcode, address, telephone number, whether moving broadband, or new or moving house. In addition the package needed to be selected and tailored.'

Flights

263. In flights, additional information was requested in 37% of provider quotes and the main requirement for additional information related to personal information and baggage, as the following examples indicate:

'Quantity of bags was not allowed to be added on the comparison site'

'Passenger details were required.'

'The comparison website would not allow input of baggage'

'Flight options are required. These include seat selection, hold luggage and insurance.'

'Travellers' information and booking contact details.'

Hotels

Only a small number of shoppers clicked through and were asked for additional information, but in a small number of cases the main additional information requested related to the 'number of people'.

Motor insurance

265. In 20% of cases in the **motor insurance** sector providers requested additional information, with some typical examples shown below:



'I was asked for payment details.'

'A number of optional extras require a yes or no response before the user is allowed to progress onto the next page of the site.'

'I was asked to confirm my no claims bonus'

'I was asked whether I required additional extras.'

Home insurance

266. Finally, in **home insurance**, where additional information was requested in 10% of cases, the typical requirements are shown below:

'It asks whether you would like additional cover for accidental damage.'

'I was asked for the price of my property.'

'I was asked for confirmation of various assumptions such as no CCJs etc. and also asked what additional cover (legal, gadget etc.) I required.'

'The optional 'Legal Expenses' and 'Home Emergency' box requires a 'yes' or 'no' answer before being allowed to proceed.'

'It asked me whether I wanted to include Keycare cover.'

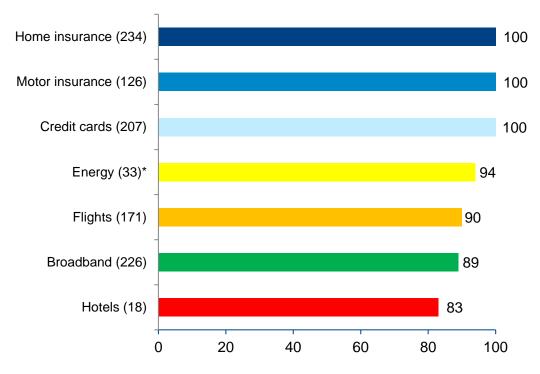
267. Following an assessment of whether additional information was required, shoppers were instructed to focus on the quote in terms of whether the original quote was still available and whether additional quotes were made available.

6.4 Is the original quote available?

As indicated below, the original quote was available for every click-through in motor and home insurance and credit cards; and whilst this was also the case in the majority of assessments across the other sectors there were some differences.



Figure 37: Differences between sectors in the proportion of providers sites' where the original quote was not available.



Note: Is the quote still available for you?

Base: Percentage of the total number of providers' sites clicked-through to in each sector (base sizes shown in brackets)

*Base sizes are small in the hotels and energy sectors due to the high number of shoppers being instructed to make the purchase directly on the DCT and, consequently, the low number of shoppers who click through.

Energy

269. In a small number of cases the original quote was not available. This included an example where the DCT stated the plan was 'not available' for a number of potential reasons, including the supplier not having the required capacity, or only wanting some offers to be available online (Figure 38).

Figure 38: Redacted screenshot showing an example of a DCT in the energy sector where the plan was unavailable.

Flights

270. In a small number of cases the original quote did not appear to be available.

Figure 39: Redacted screenshot showing an example of a DCT in the flights sector where an error occurred following click-through

Figure 40: Redacted screenshot showing an example of a DCT in the flights sector where the shopper could go no further due to a continuous searching message.



271. In a third example, the shoppers were informed that their original quote had expired and when the page was refreshed the price had changed.

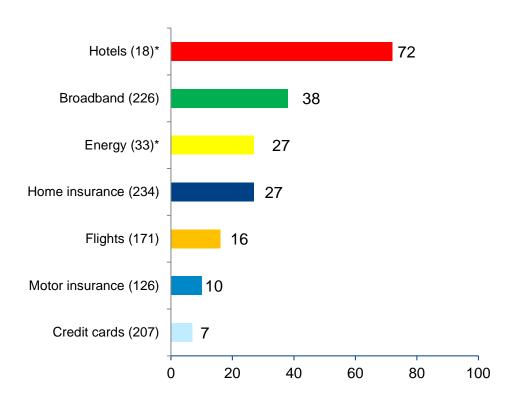
Broadband

272. In cases where the original quote was not available this was either because the original quote was not shown, was different or because shoppers were informed that certain elements weren't available (e.g. fibre broadband).

6.5 Were additional quotes available?

273. In addition to a small number of assessments where the original quote was not available; there were differences by sector in terms of whether additional quotes were provided (Figure 41).

Figure 41: Differences between sectors in the proportion of providers' sites where additional quotes were available.



Note: Does the site present only the quote you selected on the comparison site/app or additional quotes?

Base: Percentage of the total number of providers' sites clicked-through to in each sector (base sizes shown in brackets)

*Base sizes are small in the hotels and energy sectors due to the high number of shoppers being instructed to make the purchase directly on the DCT and, consequently, the low number of shoppers who click through.

Although based on small numbers, providers in the hotels sectors were most likely to provide additional quotes (in 72% of cases). This may merely reflect the fact that hotels often offer alternatives such as twin versus double beds, or quotes with and without breakfast.

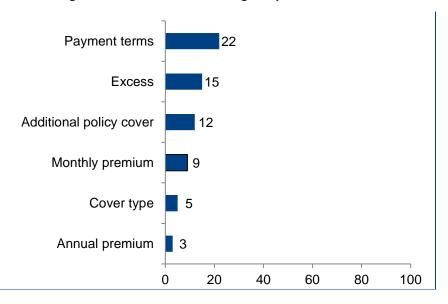


6.6 Do the results on the provider sites match what was provided on the DCT?

- A key part of the assessment related to whether the quote on the provider site was different to the quote on the DCT, with differences by sector shown below²⁹. The questionnaires varied by sector in order to focus on the key elements within each product / service (e.g. annual premium for insurance, departure time for flights); and each sector used two separate questions to establish whether the quote on the supplier site matched the DCT. The first question in each sector focused on a range of sector-specific features (which included some elements relating to price); whilst the second question focused specifically on the price itself (or in the case of credit cards 'the final offer' and broadband 'the package'). In assessments where the shopper noticed a difference in the price, offer or package they were instructed to provide the relevant screenshots indicating the difference and explain what the difference was. We address apparent price differences between the DCT and the providers in the next section and focus in this section on the other specific differences between them.
- Whilst in every case it was possible for a mystery shopper to ascertain whether the price had changed (or in the case of credit cards and broadband, the offer or package), it was not always possible to shoppers to observe whether other specific features had changed. This may have been because the variable was presented in an unclear way (either by the DCT or the provider) or because the variable simply wasn't shown either by both the DCT and the provider or by one of the two. Thus, where a shopper was asked 'did feature X shown by the provider match the comparison website/app' and the feature was not observable on either the DCT or the provider website, the shopper may well have answered 'no' despite the fact that in reality the parameters of the feature may have been the same, but just not shown or identified by them on one of the two sites.

Home insurance

Figure 42: Differences relating to specific features between the DCT and provider



Note: Does the result shown by the provider in terms of the following features match what the comparison website/app offered?

Base: Percentage of assessments (base size - 234)

²⁹ The analysis of differences between DCT results pages and providers' sites is based on the initial visits only and does not include the revisits.

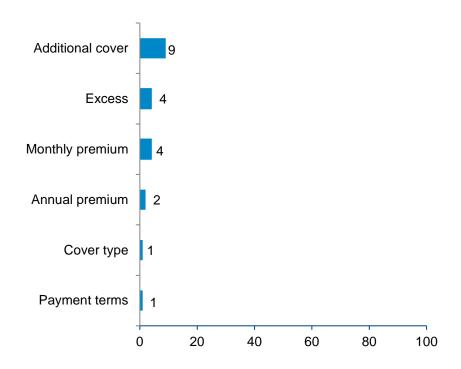


277. In a number of home insurance assessments the shopper could not match at least one element of the quote on the provider site with the quote on the DCT. As discussed above, this was because either the element had changed, or simply because information related to the element was not provided on the DCT or supplier site. For example, 'payment terms' differed in 22% of the assessments, which was higher than the proportion of assessments showing an annual or monthly premium change. There were a number of reasons for this, including differences in timescales (monthly or annual) between what had been shown on the DCT and what was shown on the supplier site; but also on account of factors such as cashback being offered on certain DCTs, installation payments being shown differently, supplier sites going into more detail about APR and/or the amount of credit payable and differences in the pricing of 'additional bundles / add-ons'. Also, whilst monthly premiums did not match in 9% of assessments this was either because the monthly premium information was not provided (with examples shown below) or because the price changed. We consider apparent price changes in the next section.

Figure 43: Redacted screenshots showing examples where monthly premium was not shown

Motor insurance

Figure 44: Differences between the provider quote and DCT quote.



Note: Does the result shown by the provider in terms of the following features match what the comparison website/app offered

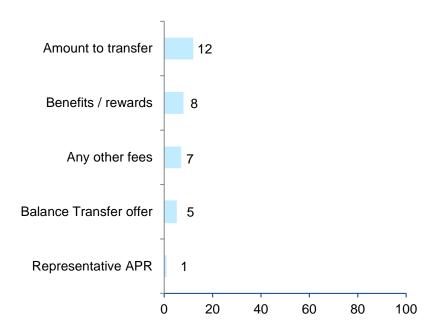
Base: Percentage of assessments (base size -126)

278. In comparison with home insurance, there were a smaller number of cases where shoppers reported that they could not match certain elements on the provider site with the DCT. In slightly under one in ten assessments shoppers noted a change in the additional cover, falling to very low numbers for excess, cover type and payment terms. As with home insurance, these examples where the variable could not be matched included cases where the information was not included or observable.



Credit cards

Figure 45: Differences reported between the provider and DCT quote.



Note: Does the result shown by the provider in terms of the following features match what the comparison website/app offered?

Base: Percentage of assessments (base size - 207)

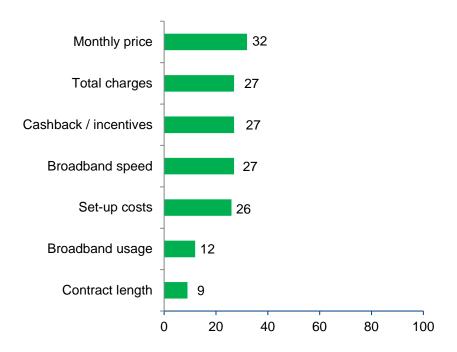
As with the other sectors shoppers were asked to comment on whether specific elements on the provider site matched the DCT, with some differences noted as above (including occasions where the information was not provided or not observable). However, as it is difficult to assess and compare credit card offers on the specific measure of 'price' shoppers were asked to comment on whether the 'final offer' was the same (as opposed to price, as per the other sectors). Overall shoppers stated that the 'final offer' was different in 5% of assessments (however, as above, only 1% stated that the representative APR had changed) for the following reasons;

- The inclusion of a fee not shown on the DCT
- The APR had changed
- The purchase offer was not shown
- Other factors such as 'the amount to transfer', 'benefits / rewards', 'other fees' and the 'balance transfer rate' also changed in a small number of cases.
- 281. Despite changes to the offer being observed in nine assessments, these changes only occurred across three DCTs. Indeed, changes were observed across all six assessments on one DCT due to the lack of information provided by the DCT on the results page.
- 282. Overall, in summary, across the financial services sectors the quotes (including price) largely stay the same when comparing the provider site to the DCT. There are cases where differences are reported, often due to the inclusion of additional features, but not in the majority of cases.
- 283. Across the Utilities and Travel sectors, however, differences in the quotes were more prominent.



Broadband

Figure 46: Differences reported between the provider and DCT quote.



Note: Does the result shown by the provider in terms of the following features match what the comparison website/app offered?

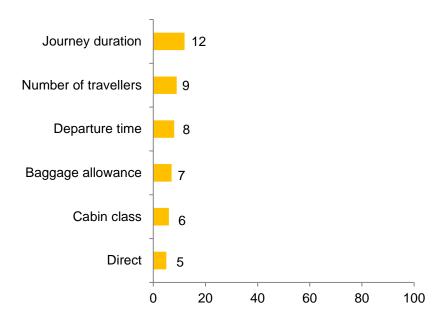
Base: Percentage of assessments (base size -226)

As noted earlier in the report, DCTs in the broadband sector were least likely to request personal information from consumers in terms of the calculation and provision of quotes. This meant that whilst DCTs were able to present a range of quotes, the scenarios could not be matched in a number of assessments. In addition, the providers were also more likely to ask for additional information. This in turn may explain the comparatively high number of cases where the information could not be matched, as shown above.



Flights

Figure 47: Differences reported between the provider and DCT



Note: Does the result shown by the provider in terms of the following features match what the comparison website/app offered?

Base: Percentage of assessments (base size -171)

285. Shoppers reported changes to certain elements in a small number of cases – e.g. journey duration (12%), number of travellers (9%) and departure time (8%). However, as discussed in the next section, shoppers noted a much higher proportion of apparent differences in prices.

Energy

286. Although based on a small number of cases (n = 33), 64% of those assessments reported a difference in the price (although in many cases like-for-like comparisons were hard). In every case the shopper also reported change in either the monthly premium, yearly bill and / or the estimated level of saving. We consider the apparent price differences in the next section.

Hotels

287. Although also based on a very small number of cases (n = 18), in almost half of those cases (44%) shoppers reported a change in the price. We consider price changes for purchases on the DCT in Section 6.8.

Summary

We have assessed whether the quote on the provider site was different to the quote on the DCT across all sectors. In this section we have focused on the differences between sector-specific features and found that, although it was not always possible for shoppers to observe whether specific features had changed, the data indicates that in some assessments, across all sectors, some elements of the quote did change. This was particularly prevalent in broadband, where in a comparatively high number of cases the information could not be matched, although this may be explained by the low level of personal information requested by DCTs in this sector. Across the financial services sectors the quotes largely stayed the same when comparing the provider site to the DCT, although where differences were reported this was often due to the inclusion of additional features. Differences were also highlighted in energy and flights.



The next section focuses more specifically on any price changes that occurred between the DCT and the supplier site.

6.7 Scale of difference between prices on the provider sites and prices on the DCT?

- 289. In those cases where the price did change (as highlighted above) the difference was analysed to investigate the extent of differences, and whether differences were greater in some sectors than others.
- Where prices were different the mystery shopping questionnaire did not ask shoppers to report the extent of the difference. The analysis that follows was thus based on our comparison between the screenshot of the DCT site and the screenshot of the provider site as well as comments from the mystery shopper. In some cases it was not possible to make an exact comparison from the screenshots, and so the analysis that follows is based only on those cases where it was possible to establish apparent differences on the basis of the shoppers' responses in combination with supportive screenshot evidence. Our analysis therefore provides an indication of where shoppers identified apparent price differences and their screenshots provide potential evidence of this, including likely reasons for the differences.
- 291. The analysis revealed that many of the differences between the price on the DCT site and that on the provider site were very small, and may simply be the result of rounding (for example a DCT showing £70 and the provider site showing £69.98). Such trivial differences have been ignored in this analysis.
- 292. The analysis also showed that prices on providers' sites were sometimes higher, but also sometimes lower than those shown on the DCT.

Home Insurance

- 293. In the home insurance sector, across the 234 providers assessed, the price on the DCT did not match the provider's website on 13 occasions in total (6%). In four of those cases a direct like-for-like comparison was not possible, and on one other occasion the price difference was only 1p, resulting in 8 assessments overall where the price difference was discernible.
- Discernible reasons for the price differences included (1) that the deposit was added on the provider site (2) that whilst the annual premium price was the same, there was no option on the provider site to pay monthly and (3) that, on two occasions, home emergency cover had to be added, which increased the final price on the provider site.



Table 30: Differences between the final price shown on the provider's website/app the same and the one provided on the results page of the comparison website/app

DCT price	Provider price	Difference by <u>annual</u> premium (%age of DCT price)	Reason given for the difference in price
Annual: £106.49	Annual: £146.48	+37.6%	Additional products/services that had to be purchased (home emergency cover).
Annual: £126.80	Annual: £150.80	+18.9%	Additional products/services that had to be purchased.
Annual: £63.76 Monthly: £6.08	Annual: £58.18 Monthly: £5.54	-8.8%	Other: No clear reason as to why the price was different.
Annual: £140 Monthly: £14.03	Annual: £125 Monthly: £12.79	-10.7%	Provider was a broker which provided multiple quotes from different insurance providers.
Annual: £140 Monthly: £14.02	Annual: £125 Monthly: £12.79	-10.7%	Provider was a broker which provided multiple quotes from different insurance providers.
Annual: £99.41	Annual: £85.65	-13.8%	Other: No clear reason as to why the price was different.
Annual: £90.49 Monthly: £9.94	Annual: £75.49 Monthly: £8.70	-16.5%	Other: No clear reason as to why the price was different.
Annual: £89.92 Monthly: £9.89	Annual: £74.92 Monthly: £8.66	-16.7%	Provider was a broker which provided multiple quotes from different insurance providers.

295. In the home insurance sector the reason for the difference was unclear in three out of eight cases and in a further three cases the provider was a broker, where a number of quotes were provided which did not include the DCT quote, as indicated below. In the remaining two cases, an additional service had to be purchased.

Figure 48: Redacted screenshot showing the original quote on the DCT.



Figure 49: Redacted screenshot showing the first quote on the provider website with a price difference

Figure 50: Redacted screenshot showing an example of additional quotes on provider website.

Motor insurance

296. In the motor insurance sector, across the 126 providers assessed, the price on the DCT did not match the provider's website on just 3 occasions in total (2%).

Table 31: Differences between the final price shown on the provider's website/app and the one provided on the results page of the comparison website/app

DCT price	Provider price	Difference (%age of DCT price)	Reason given for the difference in price
Annual: £247.69	Annual: £367.06	+48.2%	Other: DCT was quoting for Comprehensive cover and not "Third Party, Fire & Theft" as requested
Annual: £638.00	Annual: £722.70	+13.3%	Other: No clear reason as to why the price was different.
Monthly: £187.13	Monthly: £182.16	-2.7%	Other: No clear reason as to why the price was different.

297. In the motor insurance sector the reason for the difference was unclear in two out of three cases and in the third example, the cover was different.

Broadband

- 298. In the broadband sector, unlike for the majority of sectors, shoppers were asked to comment on whether the 'package' had changed rather than the 'price', on account of the fact that a number of variables may be included in a package including broadband, TV and telephone. Across the 226 providers assessed, the *package* on the DCT did not match the provider's website on 43 occasions in total (19%). As shoppers were not specifically asked to comment on whether the price was different, an exact like-for-like price comparison was not always possible. On 25 occasions the price change was established with numerous reasons given for changes in the quote, including the addition of fees / charges and changes to the package. For example:
 - Quote not available or a specific feature not available (e.g. 'The provider confirmed that fibre broadband was not available in my area so I was then offered standard broadband options.')
 - Additional costs (e.g. 'The provider site showed an extra up front cost of £60.00 for an engineer visit, as well as a £49.00 connection fee; the comparison site shows only £49.00 as a set up cost. The provider also showed an extra cost for international calls, but I could not say this was different to the comparison site as they did not mention this type of calls.')



- Lower costs for no obvious reason (e.g. 'The costs were lower and it was unclear why that was.')
- Changes in broadband speed (e.g. 'The package cost was the same but the broadband speed had been reduced to 7.0 from 14.3Mb. The broadband had changed from Fibre Broadband to Brilliant Broadband.')
- Changes to the contract length (e.g. 'The package shown was different in every way to the comparison website package. The costs and the length of the contract were different.')

Table 32: Differences between the final price shown on the provider's website/app and the one provided on the results page of the comparison website/app

DCT price	Provider price	Difference (%age of DCT price)	Reason given for the difference in price
£23.00 a month	£37.25 a month	+62.0%	Additional products/services had to be purchased.
£24.99 a month	£37.99 a month	+52.0%	Additional fees/ charges
£19.50 a month	£27.50 a month	+41%	Additional fees/ charges
£22.95 a month	£28.50 a month	+24.2%	Other: No clear reason for the difference in price.
£29.99 a month	£32.99 a month	+10.0%	Other: No clear reason for the difference in price.
£35.00 a month	£33.50 a month	-4.3%	Change to the phone package
£36.35 a month	£33.90 a month	-6.7%	Other: No clear reason for the difference in price.
£31.00 a month	£28.00 a month	-9.7%	Other: No clear reason for the difference in price.
£26.00 a month	£23.00 a month	-11.5%	Supplier price did not include some items that DCT had identified as compulsory' and these were shown as additional products/services to be purchased.
£37.50 a month	£32.50 a month	-13.3%	Fibre broadband not available in area
£32.00 a month	£27.00 a month	-15.6%	Other: Different internet speeds
£32.00 a month	£27.00 a month	-15.6%	Other: Package was different as were broadband speeds.
£43.50 a month	£36.50 a month	-16.1%	Unclear, but it appears as though the provider package included anytime calls (rather than just the line)
£26.99 a month	£22.50 a month	-16.6%	Other: No clear reason for the difference in price.



£32.50 a month	£27 a month	-16.9%	Other: No clear reason for the difference in price.
£63.00 a month	£51.00 a month	-19.0%	Other: Discount on Provider's website.
£35.50 a month	£28.00 a month	-21.1%	Supplier price did not include some items that DCT had identified as compulsory' and these were shown as additional products/services to be purchased.
£27.98 a month	£21.58 a month	-22.8%	Other: No clear reason for the difference in price.
£37.25 a month	£28.50 a month	-23.5%	Other: Fibre broadband not available in shoppers' area
£27.98 a month	£20.48 a month	-26.8%	Other: Offer on Broadband on the provider's website
£38.49 a month	£27.50 a month	-28.6%	Other: No clear reason for the difference in price.
£27 a month	£17.50 a month	-35%	Other: Various differences including data limit and contract length
£27.99 a month	£17.99 a month	-35.7%	Other: Deal on free broadband on the provider's website
£39.00 a month	£23.00 a month	-41.0%	Other: Deal on the provider site.
£40.00 a month	£13.40 a month	-66.5%	Other: Could not include Broadband in provider quote as shopper was already a customer of Brand A with a Brand A line.

Energy

- 299. The number of cases for the energy sector was small. However, across the 33 providers assessed, the price on the DCT did not match the provider's website on 21 occasions in total. In 12 of these assessments it was difficult to do a like-for-like comparison or the reason for these differences were not explained. For example, in seven the reason for the change was not established; whereas in two assessments (both on the same DCT) a monthly bill was given on the provider site compared to an annual bill on the DCT and in another assessment the shopper could not get a quote on the provider site at all.
- 300. In the remaining 9 assessments the reason for the price change was established, as shown below. The most frequently cited reason was that the shopper had to reenter their details or needs on the provider's site and were shown a different price.



Table 33: Differences between the final price shown on the provider's website/app and the one provided on the results page of the comparison website/app?

DCT price	Provider price	Difference (%age of DCT price)	Reason given for the difference in price
£768.00 Annually	£1,133.00 Annually	+47.5%	Other: Shopper had to re-enter details on provider's site and they offered one quote with a different price.
£853.00 Annually	£1,034.02 Annually	+21.2%	Other: Shopper had to re-enter all my details on the provider's website and they offered only one quote with a different price
£821.00 Annually	£984.31 Annually	+19.9%	Other: Shopper had to re-enter details on provider's site and they offered one quote with a different price.
£786.00 Annually	£910.92 Annually	+15.9%	Other: Shopper had to re-enter details on provider's site and they offered a quote with a different price.
£754.00 Annually	£815.77 Annually	+8.2%	Other: Shopper not allowed to enter economy 7 as a meter type, so they used the standard electric meter and got the quote.
£766.00 Annually	£738.00 Annually	-3.7%	Other: Shopper had to open in a different browser. The provider did not give the option of entering the monthly price that they were paying and then it asked questions to estimate their consumption.
£860.00 Annually	£806.69 Annually	-6.2%	Other: Shopper had to re-enter details on provider's site and they offered one quote with a different price.
£1,573.00 Annually	£869.15 Annually	-44.7%	Other: Usage projections were different so the price was different.
£1,573.00 Annually	£863.00 Annually	-45.1%	Other: Usage projections were different so the price was different.



Flights

- 301. In the flights sector, across the 171 providers assessed, the package on the DCT did not match the provider's website on 74 occasions in total (43%).
- Numerous reasons were given for changes in the quote. This included **four** assessments where the price increased, but the actual increase wasn't clear from the feedback. In **16** assessments the price changed because the provider showed all passengers (e.g. 2) as opposed to the price for only one passenger as shown on the DCT. Finally, in **nine** cases the price change was unclear because of a lack of images or because the provider website would not up-load. In the remaining **45** assessments a price change was reported, including **27** where the price change was minimal (e.g. based on small rounding errors) and **18** assessments where larger changes were reported, as follows:

Table 34: Differences between the final price shown on the provider's website/app and the one provided on the results page of the comparison website/app

DCT price	Provider price	Difference (%age of DCT price)	Reason given for the difference in price
£105.51	£193.96	+83.8%	Other: No clear reason for difference in price
£431.00	£612.57	+42.1%	Other: No clear reason for difference in price
£138.00	£178.66	+29.5%	Change in return time and airport
£164.00	£204.52	+24.7%	Change in return time and airport
£334.00	£412.20	+23.4%	Other: No clear reason for difference in price
£902.00	£1,089.95	+20.8%	Other: return date changed
£145.33	£174.96	+20.4%	Other: No clear reason for difference in price
£74.59	£88.59	+18.8%	Other: No clear reason for difference in price + a service fee
£757.86	£857.88	+13.2%	Other: Flight times had changed
£1,390	£1,565	+12.6%	Appeared to relate to baggage that could not be added on the DCT.
£128.28	£144.10	+12.3%	Other: Flight times had changed
£195.00	£206.42	+5.9%	Other: Different options on the provider's site.
£135.37	£142.96	+5.6%	Other: Results had expired and when page was refreshed the prices had changed.



£204.00	£211.88	+3.9%	Other: Ticket service added
£101.00	£104.98	+3.9%	Other: No clear reason for difference in price
£1,067.00	£947.86	-11.2%	Other: Flight times were slightly different.
£150.00	£94.54	-37.0%	Other: Flight times had changed slightly
£442.05	£105.17	-76.2%	Other: Flight times were slightly different

303. In summary, shoppers reported changes to the price of the product / service when comparing the provider quote to the original DCT quote (backed up by the screenshot evidence). In the majority of cases the reason for the change was clear, although there were also assessments where the shopper was unclear about the change.

Table 35: Summary of price difference by sector – based on all assessments where a price difference was discernible

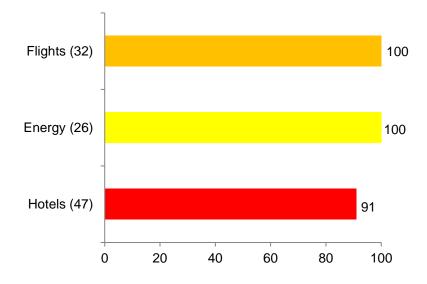
	Home Insurance	Motor Insurance	Broadband	Energy	Flights
Number of assessments where price was more than 1% different	8	3	25	9	18
20% or more lower	0	0	9	2	2
10-19% lower	5	0	8	0	1
1-9% lower	1	1	3	2	0
1-9% higher	0	0	0	1	4
10-19% higher	1	1	1	2	4
20% or more higher	1	1	4	2	7

6.8 Do the final results on DCT match the original results on the DCT?

- Those shoppers who were instructed by the DCT to make their purchase directly on the DCT also answered a series of questions relating to their purchase journey, including whether the final quote on the DCT (i.e. on the summary page) matched the quote on the initial results page, and whether the final price matched.
- 305. The base sizes in the home insurance (13), motor insurance (3), credit cards (0) and broadband (0) sectors were too small for analysis purposes (as the majority of assessments in these sectors were click-throughs). As such, the data in this section is only analysed in the flights, hotels and energy sectors, although care also needs to be taken over base sizes.



Figure 51: Whether the final quote was still available

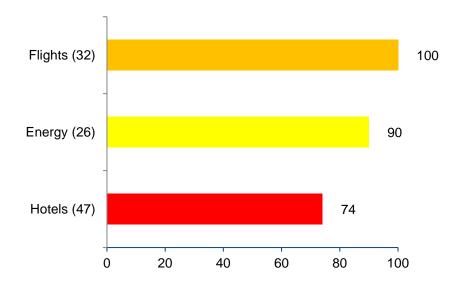


Note: Is the quote still available for you under the same conditions?

Base: Percentage of assessments by sector (base sizes in brackets)

306. As shown above, shoppers stated that the original quote was available in every case within the flights and energy sectors, although 9% in the hotels sectors said this was not the case (with the majority citing the additional inclusion of breakfast).

Figure 52: Whether the final price matched the original price shown on the results page.



Note: Is the final price shown the same as the one provided on the results page?

Base: Percentage of assessments by sector (base sizes in brackets)

307. In addition, for all assessments in the flights sector shoppers stated that the final price remained the same as for the results page, with 90% in energy and 74% in hotels stating the same.



- 308. In the hotels sector, the following reasons were given by shoppers:
 - A price drop (e.g. 'The price had dropped slightly to £219.50').
 - A price change due to rounding (e.g. the DCT's offer on the results page was rounded up to £1763.00.
 The price for rooms on the booking page was £1507.80 plus a £254.76 resort fee. Total cost of £1762.56').
 - Free cancellation (e.g. 'It was £12 more to include free cancellation').
 - The inclusion of different elements (e.g. 'The final prices were higher according to the type of room, whether refundable or not, and inclusion of breakfast').
 - Tax and charges (e.g. 'There was a £32.99 extra tax recovery and charges fee').
 - Different currency (e.g. 'The quote direct from the provider was not a like-for-like quote as the quote was given in dollars').

6.9 Section Summary

- There were differences in terms of the purchase journey in terms of whether a shopper was instructed to click-through to a supplier site to continue their purchase or whether the purchase could be made on the DCT. In the financial and broadband sectors the majority of assessments were click-throughs, but this was lower in the flights, energy and hotels sector with a higher proportion of assessments being direct purchases.
- 310. In those assessments where the shoppers were instructed to click-through, the original DCT quote was available in the majority of assessments within the financial services sectors. For a small number of assessments in the flights and broadband sectors the original quote was not available, mainly due to problems with the website or elements of the original package not being shown.
- 311. Whilst differences between the original DCT quote and the supplier quote were uncommon in the insurance and credit card sectors, there were examples of different quotes in the other sectors; particularly in broadband, energy and flights due to a combination of reasons.



7 Step 5: Revisits (Mystery shop)

- Once shoppers had completed their initial assessment of the DCT and the top three providers' sites (where click-throughs were possible), shoppers were instructed to re-visit the DCT either once (in the credit cards and energy sectors) or twice (across the other sectors), as follows:
 - First re-visit shoppers were instructed to keep their cookies and re-visit the initial DCT.
 - Second re-visit in five of the seven sectors (hotels, home insurance, motor insurance, broadband and flights) shoppers were then instructed to undertake a second re-visit, but this time removing cookies before carrying out the assessments.
- 313. Shoppers were instructed to input exactly the same information as they had done on the initial visits in order to ensure accurate like-for-like comparisons. The analysis below focuses on the first quote presented on the results page of the DCTs and considers if and how this changed between the initial visit and the re-visit(s). In particular the analysis addresses the following two main questions:
 - Did the brand and/or price of the **first ranked quote change**? If so, what was different about the brand and/or price of the quote ranked first in the revisit(s)?
 - What, if anything, happened to the **quote that was ranked first in the initial visit** when the shopper revisited the site?
- 314. GfK carried out this analysis for each sector by assessing the screenshots of the results pages taken by shoppers during their assessments. As discussed in section 2.4 there was a very small number of assessments where, because it had not formed part of the scenario, some information entered by the shopper at the revisit differed from that entered on the first visit. These cases were excluded from the analysis.

7.1 Broadband

- 315. Eleven of the broadband assessments were excluded either due to shoppers re-entering their data differently at the re-visit stage or because the screenshot was unclear. Of the 65 remaining assessments undertaken in the broadband sector, the brand of the **top ranked quote** changed in six assessments (9% of assessments overall) following the first revisit (conducted with cookies retained) as follows:
 - in four cases the price went up;
 - in one case the price stayed the same; and
 - in one case the price went down.



Table 36: First revisit – How the top ranked quotes changed compared to the initial visit. 30

DCT where the brand of the top ranked quote changed following the revisit	Top ranked brand and price in the <u>initial visit</u> results	Top ranked brand and price in the first <u>revisit</u> results	Positioning of original brand in the first revisit results + price change
1. DCT	Brand A - £17.40pm	Brand B - £22.95pm	Brand A - £35pm (4 th quote)
2. DCT	Brand A - £22.95pm	Brand B - £29.99pm	Not in Top 10
3. DCT	Brand A - £19.50pm	Brand B - £25pm	Brand A - £28.50 (8 th quote)
4. DCT	Brand A - £19.50pm	Brand B - £22.95pm	Brand A - £19.50 (2 nd quote)
5. DCT	Brand A - £29.99pm	Brand B - £29.99pm	Brand A - £29.99 (2 nd quote)
6. DCT	Brand A - £22.40pm	Brand B - £17.99pm	Not in Top 10

Figure 53: Redacted screenshot showing an example of a DCT where the brand of the top ranked quote changed following the first re-visit

- 316. Of these six assessments, the quote that was the first in the initial visits changed ranking position in the first revisit as follows:
 - two no longer appeared in the top 10;
 - two were shown in second place (although in one case the offer remained cheaper than the deal now shown in first place); and
 - two were further down the results page, following a price change.
- 317. In the second re-visit (carried out without cookies) the same six assessments resulted in the same differences as outlined in Table 36 above and, in addition, one additional quote had changed, although the brand remained the same:

CMA Digital Comparison Tools (DCT) Mystery Shopping and Websweep Research Report

³⁰ Note: in these tables, each row should be read as a separate result. In other words, the DCTs may vary and the Brand A and B may have been different brands in each row (eg Brand A in the first row is not necessarily the same actual brand as Brand A in the second row).



Table 37: Second revisit – How the top ranked quotes changed compared to the initial visit.

DCT where the brand of the top ranked quote changed following the revisit	Top ranked brand and price in the <u>initial visit</u> results	Top ranked brand and price in the second revisit results	Positioning of original brand in the second revisit results + price change
1. DCT	Brand A - £17.40pm	Brand B - £22.95pm	Brand A - £35pm (4 th quote)
2. DCT	Brand A - £22.95pm	Brand B - £29.99pm	Not in Top 10
3. DCT	Brand A - £19.50pm	Brand B - £25pm	Brand A - £28.50 (8 th quote)
4. DCT	Brand A - £19.50pm	Brand B - £22.95pm	Brand A - £19.50 (2 nd quote)
5. DCT	Brand A- £29.99pm	Brand B - £29.99pm	Brand A - £29.99 (2 nd quote)
6. DCT	Brand A - £22.40pm	Brand B - £17.99pm	Not in Top 10
7. DCT	Brand A - £74.94	Brand A - £22.95	Same position (quote changed)

318. The additional quote noted above was initially very high for all the providers shown, but dropped significantly for all providers on the revisit.

Figure 54: Redacted screenshot showing an example of a DCT where the brand of the top ranked quote changed following the second re-visit

Figure 55: Redacted screenshot showing an example of a DCT where top three quotes changed from initial visit to second revisit, but the fifth quote remained the same.

7.2 Credit cards

319. Eleven of the credit card assessments were excluded either due to shoppers re-entering their data differently at the re-visit stage or because the screenshot was unclear. Of the 62 remaining assessments undertaken in the credit cards sector, the brand of the **top ranked quote** changed in two assessments (3% of assessments overall) following the first revisit (conducted with cookies retained) as follows:

Table 38: First revisit - How the top ranked quotes changed compared to the initial visit.

DCT where the brand of the top ranked quote changed following the revisit	Top ranked brand and price in the initial visit results	Top ranked brand and price in the <u>revisit</u> results	Positioning of original brand in the revisit results + price change
1. DCT	Brand A - £25 (Total Cost – fees + interest)	Brand B - £24 (Total Cost)	Brand A - £25 (4th quote)
2. DCT	Brand A – 18.9% (Cost to you)	Brand B – 29.8% (APR)	Brand A – 18.9% (3 rd quote)

Despite the parameters of the original quote remaining the same during the revisit, the positioning of the quotes changed, as indicated below:



Figure 56: Redacted screenshot 1 - top ranked quote in initial visit, based on 'approx value'

Figure 57: Redacted screenshot 2 – Brand A replaced by Brand B as top ranked quote, now ranked on Representative APR

Figure 58: Redacted screeenshot 1 - top ranked quote in initial visit, based on 'change of approval'

Figure 59: Redacted screenshot 2 - Brand A replaced by Brand B as top ranked quote in revisit, based on a 'pre-approval' for the card.

7.3 Energy

321. Eleven of the energy assessments were excluded either due to shoppers re-entering their data differently at the re-visit stage or because the screenshot was unclear. Of the 36 remaining assessments undertaken in the energy sector, the brand of the **top ranked quote** changed in two assessments (6% of assessments overall) following the first revisit (conducted with cookies retained) as follows:

Table 39: First revisit – How the top ranked quotes changed compared to the initial visit.

DCT where the brand of the top ranked quote changed following the revisit	Top ranked brand and price in the <u>initial visit</u> results	Top ranked brand and price in the revisit results	Positioning of original brand in the revisit results + price change
1. DCT	Brand A - £78.74 (savings)	Brand B - £82.2 (savings)	Brand A - £78.74 (2 nd quote)
2. DCT	Brand A - £28 (savings)	Brand A - £32 (savings)	Position unchanged, but an increase in quoted savings

Figure 60: Redacted screenshot showing Brand A top ranked quote based on savings

Figure 61: Redacted screenshot showing Brand A replaced by Brand B

Figure 62: Redacated screenshot showing Brand A top ranked quote based on savings

Figure 63: Redacted screenshot showing Brand A top ranked, but price changed due to slightly different estimated annual bill.



7.4 Home insurance

Two of the home insurance assessments were excluded either due to shoppers re-entering their data differently at the revisit stage or because the screenshot was unclear; and one further assessment was excluded at the second revisit stage for the same reason. Of the 89 remaining assessments undertaken in the home insurance sector, the brand or price of the **top ranked quote** changed in 6 assessments (7% of assessments overall) following the first revisit (conducted with cookies retained) as follows:

Table 40: First revisit – How the top ranked quotes changed compared to the initial visit.

DCT where the brand of the top ranked quote changed following the revisit	Top ranked brand and price in the <u>initial visit</u> results	Top ranked brand and price in the <u>revisit</u> results	Positioning of original brand in the revisit results + price change
1. DCT	Brand A - £140.00	Brand B - £138.41	Brand A - £140 (3 rd quote)
2. DCT	Brand A - £140.00	Brand B - £139.52	Brand A - £140 (2 nd quote)
3. DCT	Brand A - £67.49	Brand A- £69.37	Brand in same position – higher quote.
4. DCT	Brand A - £150.59	Brand A - £154.59	Brand in same position – higher quote.
5. DCT	Brand A - £91.86	Brand A - £92.98	Brand in same position – higher quote.
6. DCT	Brand A - £61.89	Brand A - £44.35	Brand in same position – lower quote.*

The brand in row 6 is a broker rather than a direct provider of insurance and, therefore, the quotes provided by their panel of insurers will drive the results / quotes.

- 323. Of these six assessments, the quote that was the ranked first in the initial visits changed ranking position in two assessments following the *first* revisit (one into second place and the other into third place). In the four remaining examples, the brand did not change position although the actual price changed.
- 324. In the **second** revisit (carried out without cookies) the same six assessments from the first revisit were affected as follows:
 - Quotes (1), (2) and (5) shown in the table 40 above, remained the same as the first revisit in terms of both brand and price and are shown in table 41 below.
 - Quote (3) remained the same brand, but the price changed again, and is shown in table 41 below.
 - Quote (4) remained the same brand, but the price changed again, and is shown in table 41 below.
 - Quote (6) reverted back to the original quote and is, therefore, not shown in table 41 below.
- Therefore, aside from quote (6) above, which reverted back to the original quote, 5 provider quotes, as outlined above changed between the original visit and the second revisit. In addition, a further 3 quotes, which did not change between the initial visit and the *first* re-visit did change during the *second* re-visit. All 8 quotes (representing 9% of the usable assessments) are shown in the table below:



Table 41: Second revisit – How the top ranked quotes changed compared to the initial visit.

DCT where the brand of the top ranked quote changed following the re-visit	Top ranked brand and price in the initial visit results	Top ranked brand and price in the second <u>revisit</u> results	Positioning of original brand in the second revisit results + price change
1. DCT	Brand A - £140.00	Brand B - £138.41	Brand A - £140 (3 rd quote)
2. DCT	Brand A - £140.00	Brand B - £139.52	Brand A - £140 (2 nd quote)
3. DCT	Brand A - £67.49	Brand A - £68.49	Brand in same position – higher quote.
4. DCT	Brand A- £150.59	Brand A- £158.59	Brand in same position – higher quote.
5. DCT	Brand A - £91.86	Brand A - £92.98	Brand in same position – higher quote.
6. DCT	Brand A - £117.67	Brand A - £120.36	Brand in same position – higher quote.
7. DCT	Brand A - £85.00	Brand A- £86.23	Brand in same position – higher quote.
8. DCT	Brand A - £135.10	Brand B - £132.95	Brand A - £135.10 (2 nd quote)

326. Of these eight assessments, the quote that was the first ranked in the initial visits changed ranking position in three assessments following the **second** revisit (two into second place and the other into third place). In the five remaining examples, the brand did not change position although the actual price changed.

7.5 Motor insurance

327. Six of the motor insurance assessments were excluded either due to shoppers re-entering their data differently at the re-visit stage or because the screenshot was unclear; and one further assessment was excluded at the second re-visit stage for the same reason. Of the 39 remaining assessments undertaken in the motor insurance sector, the brand or price of the **top ranked quote** changed in 3 assessments (8% of assessments overall) following the first revisit (conducted with cookies retained) as follows:

Table 42: First revisit – How the top ranked quotes changed compared to the initial visit.

DCT where the brand of the top ranked quote changed following the re-visit	Top ranked brand and price in the <u>initial visit</u> results	Top ranked brand and price in the revisit results	Positioning of original brand in the revisit results + price change
1. DCT	Brand A - £240.00	Brand A - £239.00	Brand in same position – lower quote.
2. DCT	Brand A - £194.31	Brand A- £192.00	Brand in same position – lower quote.
3. DCT	Brand A - £410.62	Brand B - £406.27	Brand A - (£410.62) 2 nd quote

- 328. Of these three assessments, the quote that was the first ranked in the initial visits changed ranking position in one assessment following the *first* revisit (moving into second place). In the two remaining examples, the brand did not change position although the actual price changed.
- 329. In the second re-visit (carried out without cookies) the same three assessments were affected as follows:
 - Quote (1) remained the same as the first revisit in terms of both brand and price
 - Quote (2) remained the same brand but the price changed again, and is shown in table 43 below
 - Quote (3) had to be discounted, due to a small change in the excess required



Therefore, aside from quote (3), which was discounted, 2 provider quotes changed between the original visit and the second revisit. In addition, a further 3 quotes, which did not change between the initial visit and the re-visit did change during the second re-visit. All 5 quotes (representing 13% of the usable assessments, excluding quote (3) above) are shown in the table below:

Table 43: Second revisit – How the top ranked quotes changed compared to the initial visit.

DCT where the brand of the top ranked quote changed following the re-visit	Top ranked brand and price in the <u>initial visit</u> results	Top ranked brand and price in the second <u>revisit</u> results	Positioning of original brand in the second revisit results + price change
1. DCT 1	Brand A - £240.00	Brand A - £239.00	Brand in same position – lower quote.
2. DCT 2	Brand A - £194.31	Brand A- £189.70	Brand in same position – lower quote.
3. DCT 3	Brand A - £500.00	Brand B - £465.93	Brand A- (£500.00) 2 nd quote
4. DCT 4	Brand A- £367.03	Brand A - £401.83	Brand in same position – higher quote.
5. DCT 5	Brand A - £337.09	Brand B - £309.56	Brand A - (£337.09) 5 th quote

331. Of these five assessments, the quote that was ranked first in the initial visits changed ranking position in two assessments following the **second** revisit (one moving into second place and the other into fifth place). In the three remaining examples, the brand did not change position although the actual price changed.



Appendices

Appendix I – Scenarios used

Broadband	
Scenario 1	You want home broadband with unlimited data downloads and an advertised download speed of at least 30 mb/s. You require a 12 month contract.
Scenario 2	You want a package including fixed line telephony (with weekend calls) and home broadband with unlimited data downloads and an advertised download speed of at least 17 mb/s. You want a one month contract only.
Scenario 3	You want a package including fixed line telephony (with anytime calls), home broadband (with unlimited data downloads and an advertised download speed of at least 30 mb/s), and a Sky Atlantic TV package. You require an 18 month contract.
Scenario 4	You want a package including some international calls from your fixed line to Sweden (but not any other calls), and home broadband with unlimited data downloads and an advertised download speed of at least 76 mb/s. You require an 18 month contract.
Scenario 5	You want a package including home broadband with unlimited data downloads and an advertised upload speed of at least 9 mb/s, and a BT sport TV package which includes all European Champions League football matches. You require an 18 month contract.
Credit cards	
Scenario 1	You want to get a credit card with an interest-free deal on new purchases. You're looking for the card that has the longest 0% offer period.
Scenario 2	You want to get a credit card that offers cashback on purchases and you're looking for the lowest APR.
Scenario 3	You have existing credit card debt and you want to transfer the balance to a new credit card. You're looking for 0% interest on transfers (usually for a fixed time).
Scenario 4	You travel abroad frequently and you want to get a new credit card with favourable terms for overseas use (e.g. a good rate on foreign purchases).
Scenario 5 You want a credit card to make regular purchases and wish to earn airmiles on purcha You intend to repay in full each month.	
Energy	<u>'</u>
Scenario 1	You want a dual fuel (gas and electricity) energy supplier for your address. You want to pay by monthly direct debit.
Scenario 2	You want a dual fuel (gas and electricity) energy supplier for your address. You currently have a prepayment meter and wish to continue to pay by prepayment meter.
Scenario 3	You want an electricity supplier for your address and you want to pay by quarterly direct debit.
Scenario 4	You want a gas supplier for your address. You want a one year fixed term tariff with no exit fees. You want to pay on receipt of bill (ie not by direct debit).
Scenario 5	You want a dual fuel (gas and electricity) energy supplier for your address. You want to pay by monthly direct debit. You would like a tariff which supports the Warm Home Discount and has paper bills.
Scenario 6	You want a dual fuel (gas and electricity) energy supplier for your address. You want to pay on receipt of your bill (i.e. not by direct debit) and would like a green or environmental tariff.
Flights	



Scenario 1	You want 1 adult ticket to (any airport) on Monday, 24 July 2017 between 1000 and 1100 from any London airport returning on Monday, 31 July 2017 after 1730. You want a non-stop flight and to check in a single item of baggage (up to 20kg).			
Scenario 2	You want 2 adult tickets from any London airport to (any airport) on Friday, 3 February 2017 after 1730 and returning on Sunday, 5 February 2017 after 1730. You desire non-stop flights. You don't need to check in any luggage.			
Scenario 3	You want 1 adult, 3 children and 1 infant tickets from London Gatwick leaving after 0930 to (any airport) on Saturday, 22 July 2017. You want to return from/to the same airport leaving before 1900 on Sunday 13 August 2017.			
Scenario 4	You want 2 return adult tickets from Birmingham to Bangkok departing on Sunday, 26 March 2017 and returning on Thursday, 6 April. You would like one layover on the way out and one on the way back of at least 12 hours.			
Scenario 5	You want 1 fully flexible adult ticket from (any airport) to London City Airport leaving before 0800 on Wednesday, 14 December 2016. You want a return flight from London Heathrow, leaving between 1800 and 1900.			
Scenario 5	You want 1 fully flexible adult ticket from (any airport) to London City Airport leaving before 0800 on Wednesday, 28 December 2016. You want a return flight from London Heathrow, leaving between 1800 and 1900.			
Scenario 6	You want 1 adult ticket for 2017 Easter holiday from (any airport) to Bristol leaving after 0930. You want to stay for a week and are happy to fly any days between Wednesday, 12 April 2017 and Saturday, 22 April 2017.			
Home insurance	e			
Scenario 1	You are looking for contents insurance for your home, including your laptop (valued at £500). You want to include a voluntary excess of £200 and want to pay monthly.			
Scenario 2	You are looking for building & contents insurance for your home. You want to include a voluntary excess of £100 for buildings and £50 for contents. You want accidental damage cover to be included and want to pay monthly.			
Scenario 3	You are looking for building & contents insurance for your home. You also want to insure your TV (valued at £1,100) but nothing else is worth over £1,000. You want to include a voluntary excess of £200 for buildings and £100 for contents.			
Scenario 4	You are looking for contents insurance for your home including your bike (worth £300) when it's out of the home. You want to include a voluntary excess of £50 and want to pay a lump sum for the year up front.			
Scenario 5	You are looking for contents insurance for your home and a diamond ring (worth £2,000). You do not have any other possessions worth over £1,000. You want to include a voluntary excess of £150 and want to pay a lump sum for the year up front.			
Scenario 6	You are looking for building & contents insurance for your home. You want to include a voluntary excess of £200 for buildings and contents and a home emergency cover in your policy. You want to pay a lump sum for the year up front.			
Hotels				
Scenario 1	You want to book a double room (including breakfast) for 2 adults for 2 nights (a Friday and Saturday) in Brighton at any time during March 2017. You want at least a four star hotel but value for money is important.			
Scenario 2	You want to book a room (without breakfast) for 1 adult for 3 nights covering 3, 4, 5 March 2017 in any location. You want a least a three star hotel.			



Scenario 3	You want to book 3 double rooms (including breakfast) for a total of 6 adults for 5 nights in
Scenario 3	
	Las Vegas in September 2017. You wish to be in Las Vegas for the weekend of 16/17
	September 2017 but are flexible on arrival and departure dates.
Motor insurance	re
Scenario 1	You want fully comprehensive car insurance and a voluntary excess of £250. The insurance
	is for you only and you want to pay a lump sum up front as opposed to monthly
	instalments.
Scenario 2	You want 3rd Party Fire & Theft for your car and a voluntary excess of £250. The insurance
	is for you and your partner. You want to pay monthly.
Scenario 3	You want a fully comprehensive car insurance and a voluntary excess of £100. The
	insurance is for you and your partner. You want to pay monthly.
Scenario 4	You want fully comprehensive car insurance and a voluntary excess of £250. The insurance
	is for you only and you want to pay monthly.
Scenario 5	You want 3rd Party Fire & Theft and a voluntary excess of £500. The insurance is for you
	and your partner. You want to pay a lump sum up front as opposed to monthly
	instalments.
Scenario 6	You want fully comprehensive car insurance but no voluntary excess. The insurance is for
	you only and you want to pay a lump sum up front as opposed to monthly instalments.



Appendix II – Number of assessments (Sector vs Scenario)

Sector	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Grand Total
Broadband	24	13	13	14	12		76
(5 scenarios)							
Credit Cards	23	14	13	13	11		74
(5 scenarios)							
Energy	11	6	7	7	8	8	47
(6 scenarios)							
Flights	19	14	14	17	14	14	92
(6 scenarios)							
Home Insurance	24	14	14	16	11	12	91
(6 scenarios)							
Hotels	21	15	17				53
(3 scenarios)							
Motor Insurance	13	7	6	6	6	7	45
(6 scenarios)							
Grand Total	135	83	84	73	62	40	478



Appendix III - Number of assessments (DCT vs Scenario)

Broadband

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Grand Total
Broadband DCT 1	1	1	1	1		4
Broadband DCT 2	2		1	1	1	5
Broadband DCT 3	2		1	1	1	5
Broadband DCT 4	2		1	1	1	5
Broadband DCT 5	1	1	1	1	1	5
Broadband DCT 6	2	1		1	1	5
Broadband DCT 7	2	2	2	2	1	9
Broadband DCT 8		1	1			2
Broadband DCT 9	1	2	1	1	1	6
Broadband DCT 10	2	1	1	1		5
Broadband DCT 11	2	1		1	1	5
Broadband DCT 12	2	1	2	1	1	7
Broadband DCT 13	2	1	1	1	1	6
Broadband DCT 14	2	1		1	1	5
Broadband DCT 15	1				1	2
Grand Total	24	13	13	14	12	76



Credit Cards (CC)

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Grand Total
CC DCT 1	2	1	1	1	1	6
CC DCT 2	2	1	1	1	1	6
CC DCT 3	2	1	1	1		5
CC DCT 4	1	1		1	1	4
CC DCT 5	2	1	1	1	1	6
CC DCT 6	1		1		1	3
CC DCT 7	2	1	1	1		5
CC DCT 8	1	2	1	1	1	6
CC DCT 9	2	1	1	1		5
CC DCT 10	2	1	1	1	1	6
CC DCT 11	2	1		1	1	5
CC DCT 12			1	1		2
CC DCT 13	1	1	1		1	4
CC DCT 14	1	1	1	1	1	5
CC DCT 15	2	1	1	1	1	6
Grand Total	23	14	13	13	11	74



Energy

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Grand Total
Energy DCT 1	2	1	1	1	1	1	7
Energy DCT 2	1	1	1		1	1	5
Energy DCT 3	1	1	1	1	1	1	6
Energy DCT 4	2		1	1	1	1	6
Energy DCT 5	2	1	1	1	1	1	7
Energy DCT 6	1	1	1	1	1	1	6
Energy DCT 7	1	1	1	1	1	1	6
Energy DCT 8	1			1	1	1	4
Grand Total	11	6	7	7	8	8	47



Flights

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Grand Total
Flights DCT 1	1	1	1	1	1	1	6
Flights DCT 2	2	1	1	1	2	1	8
Flights DCT 3	2	2	1	1	1	1	8
Flights DCT 4	1	1	1	1		1	5
Flights DCT 5	2	1	1	1	1	1	7
Flights DCT 6	1	1		2	1		5
Flights DCT 7		1	1	1	1	2	6
Flights DCT 8	1	1	1	1	1		5
Flights DCT 9			1	1		1	3
Flights DCT 10	2	1	1	1	1	1	7
Flights DCT 11	1	1	1	1	1	1	6
Flights DCT 12	1	1	1	1	1	1	6
Flights DCT 13	2	1	1	1	1	1	7
Flights DCT 14	2	1	1	1	1	1	7
Flights DCT 15	1		1	2	1	1	6
Grand Total	19	14	14	17	14	14	92



Home Insurance (HI)

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Grand Total
HI DCT 1	1	1		1		1	4
HI DCT 2	1	2	1	1	1		6
HI DCT 3	2	1	1	1	1		6
HI DCT 4	2	1	1	1	1	1	7
HI DCT 5	2	1	1	1		1	6
HI DCT 6	2	1	1	1	1	1	7
HI DCT 7	1	1	1	1		1	5
HI DCT 8	3	1	1	2	1	1	9
HI DCT 9	1		1	1			3
HI DCT 10	1	1	1	1	1	1	6
HI DCT 11	1	1	1	1	1	1	6
HI DCT 12	1	1	1	1	1	1	6
HI DCT 13	2	1	1	1	1	1	7
HI DCT 14	2		1	1	1	1	6
HI DCT 15	2	1	1	1	1	1	7
Grand Total	24	14	14	16	11	12	91



Hotels

	Scenario 1	Scenario 2	Scenario 3	Grand Total
Hotel DCT 1	2	1	1	4
Hotel DCT 2	2	1	1	4
Hotel DCT 3	1	1	1	3
Hotel DCT 4	2	1	1	4
Hotel DCT 5	2	1	1	4
Hotel DCT 6	1	1	1	3
Hotel DCT 7	2	1	1	4
Hotel DCT 8	1		1	2
Hotel DCT 9	1	1	1	3
Hotel DCT 10	1	1	1	3
Hotel DCT 11		2	1	3
Hotel DCT 12	1	1	3	5
Hotel DCT 13	2	1	1	4
Hotel DCT 14	2	1	1	4
Hotel DCT 15	1	1	1	3
Grand Total	21	15	17	53



Motor insurance (MI)

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Grand Total
MI DCT 1	2	1	1	1	1	1	7
MI DCT 2	2	1		1	1	1	6
MI DCT 3	2	1	1	1	1	1	7
MI DCT 4	2	1	1	1	1	1	7
MI DCT 5	2	1	1		1	1	6
MI DCT 6	2	1	1	1	1	1	7
MI DCT 7	1	1	1	1		1	5
Grand Total	13	7	6	6	6	7	45



Appendix IV – Number of assessments undertaken by individual shoppers.

Broadband

Shopper ID	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Grand Total
1100305				1	1	2
1101269				1	1	2
1102270				1	1	2
1200774		1				1
1207230	1					1
1226653	1		1		1	3
1226731		3				3
1228458	1					1
1230988	1					1
1232950		1				1
1246274	1					1
1249964	1					1
1250659	2					2
1255251				1		1
1259122	3		1			4
1259902					1	1
1263332		1				1
1273855	1	1	2		1	5
1274934		1				1
1276646	1					1
1285816	1					1
1290442	1		1		1	3
1294152	1				1	2
1294232	2					2
1301747		1	1			2
1303944				3		3
1308581				1	1	2
1309146			1		1	2



1310410	1					1
1310436				1		1
1311082	1			1	1	3
1311645	1					1
1312160		1				1
1313318			1			1
1314590			1			1
1315321				1		1
1316010		2	2			4
1316571		1	1			2
1318549	1					1
1319337	1			1	1	3
1325121				1		1
1326509	1		1			2
1326828				1		1
Grand Total	24	13	13	14	12	76



Credit cards

Shopper ID	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Grand Total
1102270					1	1
1103591	1					1
1209116		2		1	2	5
1223368				1		1
1223835		1				1
1226731			1			1
1228458		1				1
1242527				1		1
1249964			1	1		2
1251586					1	1
1259122	2					2
1259988	1		1			2
1263332	1		1			2
1264336	1	1				2
1289568		1				1
1290442		1		1		2
1290502	1		1			2
1292239		1		1		2
1294232				1		1
1298406			1			1
1298945	1				1	2
1299893	1				1	2
1301747	1					1
1302584			1	1		2
1303291	2	2				4
1303473	1					1
1303944				2		2
1305682			1			1
1305818	1					1



1309271	1					1
1311261	1					1
1313331	1		1	1	1	4
1315216		1				1
1315292			1		1	2
1315321	1				1	2
1316010		1		1		2
1316571			1			1
1316630		1				1
1316725					1	1
1317008	1				1	2
1317468			1			1
1317823			1			1
1317869	1					1
1318549	1					1
1326864	2	1		1		4
Grand Total	23	14	13	13	11	74



Energy

Shopper ID	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Grand Total
1100348		1	2		1		4
1101269	1					1	2
1102270					1		1
1200386				1			1
1200774			1	1			2
1226653						1	1
1247146						1	1
1249964						1	1
1250659						1	1
1259902	1						1
1263332	1				1		2
1264336				1			1
1274365					1		1
1275404			1			1	2
1285955			1	1	1		3
1286234	1	1			1		3
1287146	1	1		1	2	1	6
1290502		1	1				2
1290643		1					1
1292872				1			1
1294152	1			1			2
1298296	1	1				1	3
1305284			1				1
1315805	1						1
1316571	2						2
1318549	1						1
Grand Total	11	6	7	7	8	8	47



Flights

Shopper ID	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Grand Total
1101885		1			1		2
1102768						1	1
1103122	1						1
1103591						1	1
1200386	1			1			2
1209116		1					1
1221450					1		1
1226731		1			1		2
1230988	1						1
1242527				2			2
1242775					1		1
1246274	1						1
1250686		2	2				4
1257887				1			1
1259122	2	3		1	2		8
1261150				1			1
1274365					3		3
1285465	1						1
1285816	1		2			1	4
1288342				3			3
1288787	1						1
1289016		1					1
1290502						1	1
1294152			1	1			2
1294660		1					1
1297842			1	1	1	2	5
1298406			1			1	2
1298945		1		2			3



1299648						4	4
1299893					1		1
1303291	2		1				3
1303473	1						1
1305682		1	2	1			4
1307524	2	1		1			4
1308581					1		1
1310346	1			1		1	3
1311510	1						1
1313701			1			1	2
1315292		1				1	2
1315805	1						1
1316630	1						1
1317856	1			1			2
1318549			1		1		2
1323223					1		1
1326864			2				2
Grand Total	19	14	14	17	14	14	92



Home insurance

Shopper ID	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Grand Total
1101269			1	1			2
1101885	1		1				2
1102768		1		1			2
1207230					1		1
1221450	1						1
1225104	1						1
1228458	2						2
1246274						1	1
1250659	1			1			2
1259122			1			1	2
1259988	1	1					2
1263332		1	1				2
1286234			1	1			2
1288487		1	1	1		2	5
1289568	1	1			1	1	4
1290643			1				1
1294232					1		1
1298406		2			1		3
1298945					2		2
1299648		1				1	2
1300109	1						1
1301747	2						2
1305189						1	1
1305818	1						1
1307524			1	2		1	4
1309271				1	1		2
1309557				1			1
1311261	1	1					2



1311645			1	1			2
1313009			1				1
1313318	1			1	1		3
1313701			1				1
1315321	1		1				2
1316010						2	2
1316571	2						2
1316630	1				1		2
1317008	1		1				2
1317468	1	1				1	3
1317840		1		1			2
1317869		1	1	1	1		4
1318549	1			1			2
1319337		1				1	2
1320883	1						1
1325121	1			1			2
1326509		1		1	1		3
1326990	1						1
Grand Total	24	14	14	16	11	12	91



Hotels

Shopper ID	Scenario 1	Scenario 2	Scenario 3	Grand Total
1100305			2	2
1102768	1		1	2
1207230		1		1
1228458		2		2
1249018			1	1
1251586		1		1
1255251	1	1	1	3
1259902	1			1
1259988	1		1	2
1263332	2			2
1266326	2	1	3	6
1281968		4	1	5
1285955	1	1		2
1290442	1		1	2
1290502	1		1	2
1300606	1			1
1303473	1	1		2
1303944	1	1		2
1305284	1		1	2
1312499		1		1
1315292			1	1
1316571	2			2
1316630	1		1	2
1326849			1	1
1326864	2	1	1	4
1326990	1			1
Grand Total	21	15	17	53



Motor insurance

Motor Insurance	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Grand Total
1100348					1	1	2
1101885	1	1	1				3
1102270					1		1
1207230				1		1	2
1246274	1						1
1249964				1			1
1250659			1				1
1250686						1	1
1259122			1		1		2
1259902	1						1
1259988	1			1			2
1263332	1						1
1264336	1				1		2
1264363	1	1			1	1	4
1274934	1	2				1	4
1275404			1				1
1290643		1					1
1294152		1					1
1294232	1			1			2
1298296						1	1
1301747	2						2
1309557			1				1
1311645		1					1
1313318			1				1
1313331	1			1			2
1314590				1			1
1317468					1	1	2
1318549	1						1



Grand Total 13 7 6 6 6 7 45