

Grove Cottages response to the CMA's consultation on the draft unfair commercial practices guidance

Dear Sirs

With reference to the draft Digital Markets, Competition and Consumers (DMCC) Act 2024

I would like to pass on some insights as a Professional in this field for 27 years as a Boutique Holiday Cottage Agency:

Your recommendation 'in the rough' are commendable and mainly what we as Agents do. They are very applicable to the individual Owner of a cottage who handles everything themselves in the situation where the cottage is being marketed and controlled by the owner themselves.

But it seriously falls apart in some areas when the Cottage is administered by an Agent on behalf of the Owners.

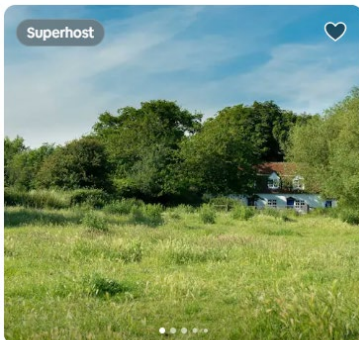
I have a Sole Agency that operates a very personal care of owners, we aim handle between 25 – 45 Cottages so we can maintain a high level of care on each cottage.

Because of the many legal constrictions imposed on being an Agent we are by Nature much more careful in already following your proposed rules – it is the individual 'Amateur' owners who bend the truth and add hidden extras – we live by our reputations and are not going to risk any kind of dangerous or untruthful representation of a cottage.

I have 3 areas of concern:

1. Owners details to be on Cottages online entries

I am Sole Agent for my cottages and as an Agent, I promote them not only on my home website but through various OTA's like Airbnb, Booking.com etc who recognise me as 'Hosted by a Business' – see my entry for a cottage on Airbnb:



Cottage in Tollesbury ★ 4.82 (28)
'The Wobbin', beautifully remote with Sea Views.
Hosted by a business
21-28 Feb
£150 night · [£1,044 total](#)

Therefore it seems logical that it should be My Agency details that should be displayed on website entries Not my owners.

Those who book will get the full address and contact **for the property** when they book – this in many cases but not all, is the owner (those with cottage managers because Owners live too far away will provide the cottage managers phone details instead)

Exact rather than approximate addresses being displayed before booking also raises problems, for instance how would you want every burglar to know exactly when your house is empty ?

It would also obviously lead to my Owners being harassed by unwelcome contact by other Agents approaches, backdoor requests from guests for lower rates, privacy GDPR issues and many phishing attacks and various scams.

It is exactly to avoid these issues and many others that the owners use an Agent in the first place.

As Agent I vet, photograph, make owners aware safety and legal requisites, I handle or commission the whole problem and workload of SEO, website maintenance, Promotion, social marketing, advertising, Newsletters, pricing and valid descriptions. I look after personal customer enquiries & care, guest screening and dispute management. Legal issues, Insurance requisites and financial security issues.

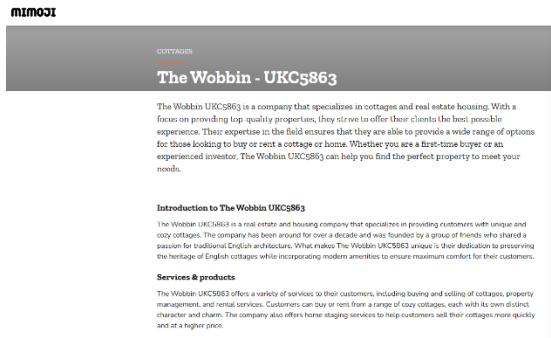
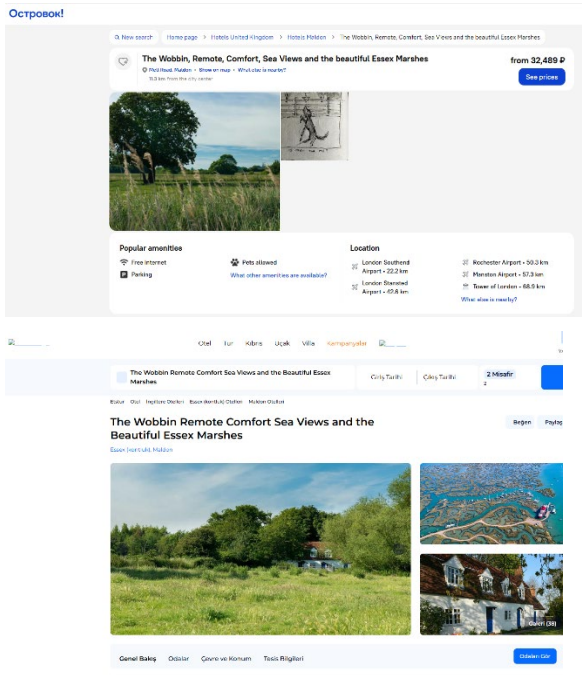
If we are made to put the actual Owners details on the website entries, it completely undermines our position and will lead to the owners being subject to constant unwanted direct contact from all the above elements.

It also raises serious issues of GDPR, data theft, data scraping & fraud and security.

We have had instances where our entire cottage entry has been scaped and remade on rogue websites without our knowledge or approval.

Supplying our many online site entries with the Owners details will only embolden such rogue sites to approach the owner with bookings, this policy used to be carried out by Booking.com as a way to get more owners signed up. They basically put every cottage on the internet onto their website and if a booking came in approached to owner with the question do you want this booking then sign up. Other rogues websites would just sell the dates and not care that the guest would not have a room

A 1-minute scan of Google shows me three suspicious websites for one of my cottages immediately:



So, where an Agent is handling the affairs of a cottage it should be the Agent details - not the Owners details shown on the web entry.

2. Headline Prices.

Simplistically you are absolutely right. Pricing should be clear with no hidden fees.

But again, there are problems with a blanket total Maximum price.

For Instance, Cottages sleeping 4, 6 and more guests, are much much harder to sell in Winter.

So, one answer is to have a lower rate if less people book and less bedrooms are used - reflecting less laundry, cleaning and heating costs.

You saying it has to be headline price for full capacity (say 6 people) completely destroys this way of keeping the cottage viable through Winter which must be done to get the required number of days booked to qualify as a Holiday Let.

Please remember that All online booking forms require you to state how many guests you are - and will display that price for that amount of guests.

This is the point of clarity for the guest, where extras can be added and where honesty has to be maintained – if prices default to a 2 person price that helps sell it to 2 guests, especially when 2 guests is put into the search requirements, if a guest searches for 5 guests it will get a result and a price for 5 guests.

If you say it must default to the full occupancy it destroys that ability to sell that large cottage at a reduced price for 2 guests because searches for 2 people will be showing a price for 5 people– this would mean a massive drop in sales for the Winter Months, putting the viability of continueing as a Holiday Cottage in jeopardy.

The image displays two side-by-side screenshots of a booking interface for 'Wren Cottage'. Both screenshots show the same property, arrival date (Fri 07 February 2025), and stay duration (2 nights until Sun 09 February 2025). The left screenshot shows 2 adults selected, resulting in a total price of £405.00. The right screenshot shows 4 adults selected, resulting in a total price of £475.00. Red arrows point to the 'Adults' dropdown menu in both screenshots. The text below the price in both screenshots reads: 'There are discounted rates for 2 guests using one bedroom outside peak season, reflecting the savings on cleaning, heating and laundry'. Both screenshots have a 'BOOK NOW' button and a 'Powered by' logo at the bottom.

This problem is exacerbated when we link with OTA's like Airbnb who have a 'one size fits all' approach - and will not allow text information about discounted rates for less guests using less bedrooms.

With them it will end up that if you are 2 guests you will never see larger cottages which offer a competitive 2 person price.

So, if the Quotation calculator quotes the Correct price why start messing around with the system.

3. Insurance, damage waiver, damage deposit.

All these 'optional extras' or 'returnable' items should not be included in the Headline price, because if you get the money back where is the logic of including it in the Headline Price - and the others are Options that you may not want to take.

Yes, you might have furnishings which are 5 Star and want a damage deposit of £200 but so long as it is regulated properly and meant as a deterrent and returned promptly then there is no reason to include it in a headline price.

Here again we as Agents rely on our reputation and reviews, we would quickly go out of business if we were regularly keeping damage deposits – this is the age of social media and one step wrong with a guest who is an influencer and bad news goes viral in minutes – none of us Agents want to take that risk. Whereas an individual can, they can change the name of their cottage and all kinds of dodges to overcome angry guests.

**So, if its an optional extra or a returnable deposit then leave it out of the headline
(or any) Price**

I hope this helps you formulate things.