

Consumer Information and Regulation

Report prepared by Vanilla Research for the
Better Regulation Executive
And the National Consumer Council (NCC)

July 2007



DEPARTMENT FOR BUSINESS
ENTERPRISE & REGULATORY REFORM



<u>1. EXECUTIVE SUMMARY.....</u>	<u>4</u>
<u>2. BACKGROUND AND OBJECTIVES.....</u>	<u>6</u>
<u>3. RESEARCH METHODOLOGY.....</u>	<u>8</u>
<u>4. CONSUMER CREDIT.....</u>	<u>11</u>
THE CASE STUDY	11
AN OVERALL AVERSION TO SMALL PRINT.....	11
CONSUMER ATTITUDES TO IGNORING CONTRACT DETAIL	12
POTENTIAL SOLUTIONS.....	13
<u>5. CHILD TRUST FUND DECISION TREE.....</u>	<u>14</u>
THE CASE STUDY	14
OVERALL REACTION TO THE DECISION TREE.....	15
SUPPORT FOR GOVERNMENT INVOLVEMENT IN SUCH DECISIONS	15
<u>6. CALL CENTRE MANTRA.....</u>	<u>17</u>
THE CASE STUDY	17
A LIMITED CAUSE OF CONCERN TO CONSUMERS	17
WAYS FORWARD	17
<u>7. RECYCLING.....</u>	<u>19</u>
THE CASE STUDY	19
OVERALL CONSUMER CONFUSION.....	19
A BROAD-BRUSH APPROACH TO RECYCLING.....	21
THE IMPACT OF INFORMATION ON BEHAVIOUR	22
<u>8. PRODUCT SAFETY.....</u>	<u>23</u>
THE CASE STUDY	23
OVERALL CONSUMER ATTITUDES TO SAFETY INSTRUCTIONS	23
WHY SAFETY INSTRUCTIONS ARE SELDOM READ	24
OTHER SAFETY SIGNALS	25
<u>9. EXTENDED WARRANTIES.....</u>	<u>26</u>
THE CASE STUDY	26
THE OVERALL CONSUMER CONTEXT	26
THE CONSUMER IMPACT OF THE SUPPLY OF EXTENDED WARRANTIES ON DOMESTIC ELECTRICALS GOODS ORDER 2005	27
<u>10. SCORES ON THE DOORS.....</u>	<u>30</u>

THE CASE STUDY	30
OVERALL REACTION TO THE SCHEME.....	30
DETAILED ASSESSMENT OF A PILOT SCHEME.....	31
POTENTIAL USE OF THE SCHEME.....	32
THE ROLE OF PEER-TO-PEER WEBSITES	32
WIDER USE OF REGULATORY INFORMATION	33

1. Executive Summary

At the beginning of January 2007, the Better Regulation Executive and National Consumer Council began work on a project on Consumer Information to **establish under which circumstances information provision is an effective and efficient regulatory tool.**

This report represents the findings of the qualitative consumer research element of the wider project. The research was formed around a qualitative discussion group format, covering 12 groups in all

The information isn't working

Whether it is regulations developed to create a more competitive market in extended warranties, the role of symbols in domestic recycling, or consumer credit 'small print' requirements, this research suggests that the desired effects are not currently being achieved whether it be a result of regulations or businesses' interpretations of them. Few consumers knew you could buy extended warranties from third parties, substantial confusion existed over the various recycling symbols, and hardly anyone read consumer credit small print, or, more importantly, knew what it contained.

This did not mean the 'consumer system' did not work – on the whole consumers found short cuts and usually ended up making decisions they were happy with; they were just not necessarily making fully *informed* decisions, meaning that it is unlikely that the regulated information was having a major impact on their behaviour.

More information is definitely not better information

Time and again consumers called for simplification and reduction in the amount of information they were expected to absorb. To take the prime example of consumer credit agreements, they complained that the contents were 'jargon' as well as overly long small print. Simply shortening the contract would not work, nor would rewriting it in layman's terms – they called for a combination to make it, in essence, useful. Elsewhere in the groups suggestions were made for greater use, where appropriate, of symbols, diagrams and colour. This perhaps explains the overwhelmingly positive reaction to the Child Trust Fund Decision Tree, which adopts a more colourful, schematic approach than financial services literature traditionally takes.

The role of the information discussed was often misinterpreted

Although only a part of the information discussed was estimated to cost over £500 million¹ per annum, in most cases consumers thought its purpose was to protect or benefit the companies rather than consumers. Recycling logos were felt to be there to serve a marketing purpose as much as anything else, product safety guidelines to protect the company against litigation in case of accidents, and information to call centre customers that their calls may be recorded mostly as an implicit 'warning against possible verbal abuse'. With such an interpretation of information's purpose, it is perhaps understandable that consumers invested such little time absorbing it.

¹ See Better Regulation Executive Project Case Study Papers

The needs of vulnerable consumers were in most cases no different to everyone else's

A number of the focus group discussions were held with people from low and very low-income households, those with low levels of literacy, and elderly consumers. What became apparent was that their underlying needs in terms of consumer information were pretty similar. Differences were more likely to be apparent in terms of the *degree* of the need, or the preferred *form* it is delivered in. Whether we were speaking to a high-income socialite or a low-income parent, they both wanted to know how hygienic their favourite restaurant or pub was, and expected that 'Scores on the Doors' would itself ensure the answer was 'very'. They both skipped reading consumer credit contracts, and felt a shorter, simpler version would be a marked improvement.

Throughout the groups it was apparent that much of the information provided was deliberately bypassed by consumers, or worse still went over their heads. Crucially, consumers felt that Scores on the Doors and the Child Trust Fund Decision Tree were the best examples of where information was provided in a genuinely useful and effective way – both cases where the role of information has been radically rethought. Given the cost of providing the other forms of information discussed in the project, and the protection it is intended to afford consumers, it is clear that similar improvements are essential if such information is to also 'earn its keep'.

"You think you are the only one that doesn't understand the information, but being here...it has just proved to us that we are not imagining it, that everybody is in the same boat."

Low literacy consumer

2. Background and Objectives

At the beginning of January, the Better Regulation Executive and National Consumer Council began work on a project on Consumer Information to **establish under which circumstances information provision is an effective and efficient regulatory tool**. This project originated from the Better Regulation Commission report on 'Risk, Responsibility and Regulation' and analysis carried out in the government-wide Administrative Burdens Measurement exercise.

This project encompassed both extensive desk research and debate with key stakeholders, undertaken by Better Regulation Executive and National Consumer Council team members, along with qualitative research commissioned from Vanilla Research, an independent research agency, which explored consumer experiences and attitudes across a range of markets.

This report represents the findings of the qualitative consumer research element of the wider project, and its findings and conclusions should be considered in the context of the wider report.

The broad objectives for the consumer research element were to:

- Hear a broad range of perspectives from consumers in different situations / from different backgrounds across the UK.
- Hear about the particular experience of 'vulnerable' consumers.
- Find out about consumers' experience of specific types of information. What information provision are they conscious of in different settings? To what extent do they/are they conscious of relying on this information? What factors determine whether they find such information useful? Are there any big gaps where they would like more information, or instances where the quantity of information is overwhelming?
- Probe attitudes and experiences with particular regard to our selected case studies.

The project scope covers "regulated" or "third-party" consumer information provision requirements. They define the content and format of information communicated between two parties other than government. Typically they regulate communication between a private or voluntary sector organisation and a citizen or consumer.

Note

The Better Regulation Executive has been tasked by the Prime Minister to reduce the burden of Government regulation for both the private and public sectors. This means making regulation smarter; less costly and bureaucratic; and simpler to use and understand wherever possible. It works to cut existing unnecessary red tape and to ensure that new regulations coming out of other Government departments are proportionate and light touch.

The National Consumer Council exists to promote the consumer interest to policymakers, service providers and regulators, and one of its strategic objectives is to make markets work for consumers. It has a strong track record and extensive

work programme in the field of regulation; recent publications include 'Reputation and regulation' and 'Better regulation: the consumer contribution.' One of its ambitions in this field is to encourage regulators to put consumers at the heart of their decision-making.

3. Research Methodology

The research took a qualitative discussion group format, covering 12 groups in all. The groups were structured in order to cover a spectrum of different groups in society across region, age, household income and consumer experiences, with an emphasis on 'vulnerable' groups. Vulnerable groups were in this instance defined as those on low incomes (under £10,000 per year pre-tax household income, excluding benefits), the elderly (pensioners) and those with low literacy levels.

Group Location	Age	H'hld income	Extra criteria:
Plymouth	Pensioners	High	
Plymouth	35-55	Very low	
London	35-54	High	All with Internet usage medium or high (Q11)
London	18-29	Medium	
Glasgow	70+	Very low	
Glasgow	35-54	Medium	At least half to have children under 11 in the household Q6
Birmingham	Pensioners	Low	All with Internet usage none or minimal (Q11)
Birmingham	21-34	High	All with Internet usage medium or high (Q11)
Port Talbot	Pensioners	Medium	
Port Talbot	35-54	Low	At least half to have children under 11 in the household Q4
Nottingham		Mainly low	Low literacy levels
Havant		Mainly low	Low literacy levels

Additional recruitment criteria were also applied (see table above, right hand column) to ensure a spread of internet usage and children in household. Lastly, recruitment criteria were applied to each group according to the first Case Study being discussed in that group. For instance if Extended Warranties were being discussed first, at least half the respondents had bought an extended warranty within the past 18 months.

The research was centred around discussion of 7 Case Studies, provided by the Better Regulation Executive. These were as follows:

- Consumer credit agreements and prescribed wording
- Child Trust Fund and decision trees for financial choice
- Call centre message “this call may be monitored for quality control purposes”
- Recycling symbols and changing attitudes to waste management
- Product safety warnings, protections and responsibility
- Extended warranties and ensuring that consumers make an informed choice
- “Scores on the doors” scheme to publish food hygiene inspection ratings for restaurants

These Case Studies were rotated across the groups, covering 2 in each group (with ‘Call Centre Message’ covered in brief the end of each), in order to get mixed coverage by age, household income etc.

Group Location	Age	H’hd income	First Case Study Covered	Second Case Study Covered
Plymouth	Pensioners	High	Extended warranties	Recycling
Plymouth	35-55	Very low	Child Trust Funds	Scores on doors
London	35-54	High	Scores on doors	Recycling
London	18-29	Medium	Extended warranties	Recycling
Glasgow	70+	Very low	Product safety	Extended warranties
Glasgow	35-54	Medium	Product safety	Child Trust Funds
Birmingham	Pensioners	Low	Scores on doors	Recycling
Birmingham	21-34	High	Scores on doors	Consumer credit
Port Talbot	Pensioners	Medium	Consumer credit	Product Safety
Port Talbot	35-54	Low	Consumer credit	Child Trust Funds
Nottingham		Mainly low	Extended warranties	Scores on doors
Havant		Mainly low	Consumer credit	Product Safety

A note on interpretation

The project team decided to approach the issues via qualitative research groups. These are designed to explore issues with an open mind, and allow consumers to develop their opinions around a subject rather than just respond to pre-structured questions. It is best suited to research such as this, where hypotheses need to be developed rather than simply proved or disproved.

Although 12 group discussions were carried out, each Case Study was only covered in 4 groups. As a result, the research findings for each Case Study are not as robust as other research studies of a similar size, where only one issue is discussed within all 12 groups.

Qualitative research by its nature is intended to explore and draw out relevant themes and directions, and find out what people think and why they think it, rather than specifically measure the strength or extent of opinions and attitudes. As a result, this research report should be interpreted as reflecting the scope of consumer opinion on the issues discussed, and the reasoning behind it, rather than a definitive analysis of those opinions. It is a reliable indication of consumer opinion, rather than a finite measurement of it.

The robustness of the research is supported by the relative consistency of many of the findings across the groups. Understandably we have refrained from reaching too many firm conclusions on how precise opinions differed by age or income etc, but we have indicated patterns where we believe they exist.

4. Consumer Credit

The Case Study

Much research and analysis has been carried out around the uptake of consumer credit and financial capability more generally. One government intervention in this area has been to implement statutory requirements on consumer credit providers to ensure certain information for each product is provided to consumers, with the aim of enabling them to make fully informed purchase decisions. Much of the statutory information that is designed to protect and help the consumer is presented alongside contractual information on agreements developed by businesses which can be long, legal and complex documents

The research looked to explore this issue, and more specifically to:

- assess consumer opinions towards consumer credit purchase decisions
- discuss the environment within which purchase decisions are made
- explore what information is taken into account when making such decisions
- assess the value of statutory informational requirements on consumer credit agreements within this context
- explore how such information could be framed to make it more helpful and relevant to consumers

An overall aversion to small print

Of all the Case Studies that demonstrated consumers' aversion to 'small print' consumer credit perhaps epitomised it the most. Despite the high profile and concern consumer credit currently receives in the UK, the consumer groups found large-scale ignorance and neglect of contract small print across the board – among young and old, low and high incomes, the financially literate as well as those with low literacy levels.

The reasons were unsurprising, and shared many characteristics with the Extended Warranties Case Study. Consumer Credit contracts were typically felt by consumers to be full of dense, inaccessible small print, and were considered to be there to protect the company rather than the consumer, written in jargon and legalese.

*“All this has been made up by big business people and lawyers and it has been scrutinised. What have we got to be able to match that?”
Low literacy*

Contract detail was seen to be largely ignored when considering whether or not to take out consumer credit, or who from, since in many cases credit was considered a commodity. Functionally credit cards were felt to roughly do the same job, so consumers planning to take out credit often chose on the basis of price (APR – Annual Percentage Rate - and or cashback offers). In addition there were those who chose to take out a card spontaneously – e.g. being offered free travel insurance while in their bank branch, or a sales discount in the case of store cards. However, in both cases brand was often seen to play a 'hygiene' role. They might not take out a card with someone they have never heard of, but other than that most suppliers were in play.

With credit easily available, and the focus being on headline APR or interest free windows, consumers did very little 'research' into the details of any offer.

*"Especially with credit cards, you don't really need to go and look because it comes to you. Whether it's emails, random post, stopped in the street, you name it. Everyone wants to give you a credit card."
21-34 high income*

In such circumstances the contract detail was ignored, especially in the case of spontaneous decisions – for instance when a store card was offered at point of sale.

Consumer attitudes to ignoring contract detail

For most ignoring the contract small print was not felt to be a big issue. Firstly, in their eyes the key information such as "typical APR" was usually highlighted elsewhere - though any comparison was purely superficial, since few understood what it really meant.

*"It says 'After three months you'll get a typical rate of 15.9%.' Is that typical?.... This one's 15.9%, that one's 16.9%."
35-54 low income*

Secondly, there was a sense that the body of the contract did not contain any important information anyway. For many, the fact that 'Key Facts' were included in a summary box suggested to them that anything else could not be 'key'. Furthermore, much of the detailed wording was felt to be legalese, and warnings around missing payments etc were felt to be common knowledge anyway – people might not abide by it, but there was a general understanding that you needed to keep up payments. Essentially many consumers were blasé about ignoring the contract detail, and considered it relatively unimportant.

The exceptions were the low literacy groups. They ignored the small print because it was 'scary' and 'difficult', and because it made them feel 'humiliated' and 'concerned', rather than because it was 'blasé', 'unimportant' and 'boring' (the words used by consumers in other groups).

*"It is so tiny and such a lot of it and I just can't deal with it...it sets off a panic alarm in me, I look at this and think oh I can't do it, I can't take it in, there is too much to learn, too much to read."
Low literacy*

In the words of another consumer with low levels of literacy, the contracts were full of 'small print and big words'.

The tendency among all types of consumers to avoid the small print was compounded by some of the phraseology actually used. When prompted for their reaction to wording such as 'The Consumer Credit Act 1974.....' people glazed over, saying they had not heard of the Act, that they did not know what it contained, and that they did not understand what the implications were. Not knowing what the 'certain requirements' were, they couldn't tell whether they'd been abided by.

*"When it says 'The Act' that already makes me bored to be honest with you."
21-34 high income*

*“What the hell is the Consumer Credit Act 1974 anyway?”
Low literacy*

The impact of all of this was in some cases amplified outside of the contract details themselves. Some consumers professed that the daunting small print put them off reading other material attached to it.

*“It is (important) but it’s the way it looks, it just makes me not care.”
21-34 high income*

In essence, people largely stuck to reading the headline bullet points in the literature – APR, length of interest holidays etc. Many consumers admitted it would probably be good to read more, but like going to the gym, they couldn’t bring themselves to actually do it.

*“Obviously it’s informative but really I can’t be bothered to read it.”
21-34 high income*

Potential Solutions

Our consumers reacted positively though to a number of the suggestions aimed at making the detail more accessible:

- shorter more concise versions were welcomed
- with detail held elsewhere for those who require it, possibly online (or in the case of the low literacy groups, a helpline)
- simpler, less legalistic wording
- a clear reference to and number for Consumer Direct or other appropriate advice mechanism for those who need help
- lastly, the low literacy groups responded positively to the idea of having the main points of the contract ran through verbally at the point of sale, where possible

There can be some debate about the practicalities of the various solutions, but what the groups made clear was that the current form of contract was seen to be serving little purpose for consumers.

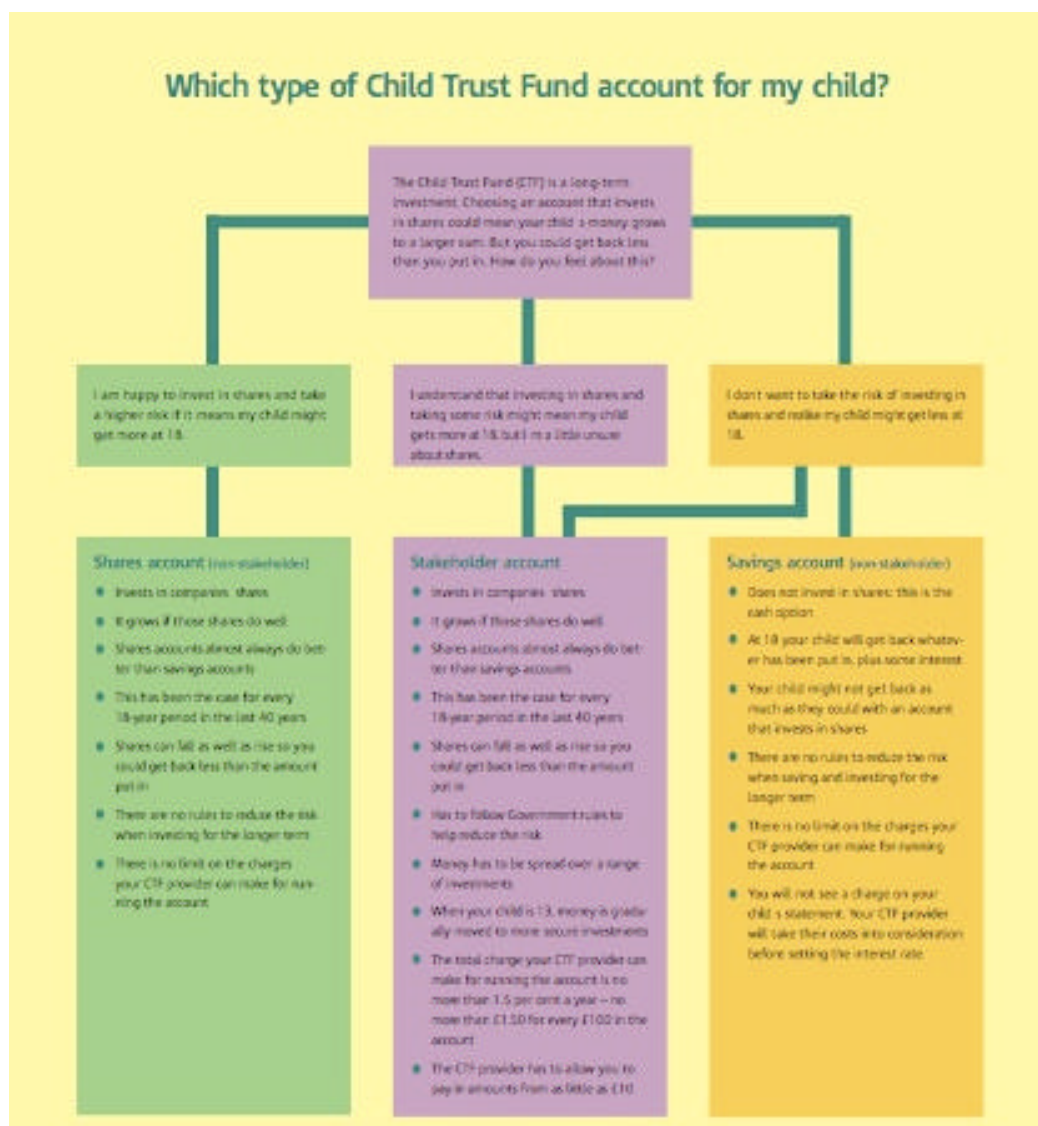
5. Child Trust Fund Decision Tree

The Case Study

The Child Trust Fund was announced in 2003 and is administered by HM Revenue and Customs (HMRC). Research carried out in October 2005 with parents that had not yet opened an account however found that the process of choosing a fund “had proved a more complicated and daunting process than they had imagined”. The majority had tried at least once to gather information and/or open an account but found the process too difficult. “Respondents were seeking clear step-by-step advice,...advice which so far had failed to materialise.” As a result of this research HMRC modified the information pack to include a toolkit, including the decision tree.

The consumer groups looked to explore reaction to this Decision Tree, and the value of framing information in a visual and diagrammatic way. More broadly, it covered how consumers felt about Government being seen to get involved in such consumer decisions, and whether information in such instances enabled consumers to make more informed choices.

The HMRC’s Child Trust Fund Decision Tree



Overall Reaction to the Decision Tree

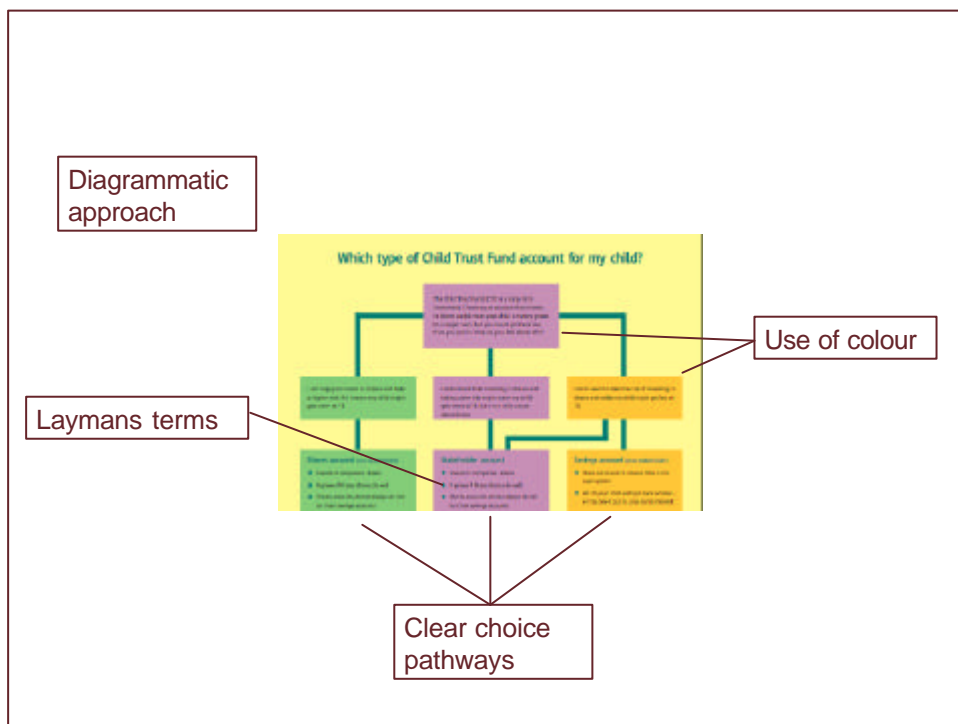
This was an example where a newly introduced information model received overwhelming approval (along with Scores on the Doors). Although we were not testing Child Trust Funds per se, there did seem to be limited understanding and awareness of all the options available, with many people, especially in the low income groups, being seen to choose providers based on relatively simple criteria (simply going to their bank, or the first outlet they see on the High Street, or one that had a special offer running).

“(Barclays) Because I thought I was going to get him a free stuffed toy, but he never got it.”

35-53 Very low income

Overall it was felt to be a fairly confusing landscape, with few consumers in the groups being seen to be making truly *informed* decisions.

Into this confusion the Decision Tree was seen to bring light. Reactions stemmed from its helpfulness, its clarity, the use of layman’s terms (e.g. ‘when your child is 13 money is gradually moved to more secure investments’), the helpful use of colour, the visual and diagrammatic presentation and the logical pathway the tree presents.



Support for Government involvement in such decisions

Importantly there were mostly positive reactions to Government being involved in helping people make such a decision. Crucially, it was seen as guiding rather than telling, advising rather than dictating. Since the Decision Tree sets out the case for each option it was felt to help you make your own decision, rather than force one upon you.

This helpfulness was especially evident among the low-income parents group, who felt neither confident nor informed when making such financial decisions.

"I think this is better. It's easier to understand. When you've got forms you start to read a form and then you get fed up after a couple of pages."

35-54, very low income

Consumers supported the Government's approach to choosing an account as a default in situations where parents do not make a choice themselves (in one instance in the groups the mother had not realised the vouchers expired). Consumers repeatedly referred to it as 'the child's money', thought that the Government could help the child by stepping into the vacuum. The challenge to the Government came in terms of which account it should be.

Consumers were unanimously agreed that the 'default' should *not* be the higher risk Shares Account (non-stakeholder), but views were mixed over which of the other two options was best. For some there was a sense of preferring the security of the Savings Account over the returns of the Stakeholder Account (it's the child's money and they wanted to rule out any risks), while for others the Stakeholder Account seemed a perfectly sensible option.

The impact of the Government's choice did have implications for others – but the extent of this was marginal. The fact that the Stakeholder Account was in effect 'approved' did make it more attractive to some parents, but the sample on which such a migration was based was minimal.

"It explains to you exactly the difference between savings, stakeholder and shares and the risks that you take between the three. So I've changed my mind from the savings account; I think I would put mine in the stakeholders account."

35-54, very low income

From a wider perspective, consumers actually volunteered alternative applications for such a model – credit cards and mortgages were mentioned specifically. For many, financial services and products were confusing, and the information provided with them complicate rather than simplify matters.

"It's more of an 'Idiot's Guide' and that's what I like."

35-54 low income

In such cases consumers saw real merit in independent advice that cut through and laid bare the core of the decision, without all the confusing collateral. Government involvement in providing information was welcomed in principle, as long as it was:

- Advising rather than telling
- Clearly laid out
- Explained and reasoned (e.g. shares outperform savings over 18 years)
- Balanced in terms of giving pros and cons for each option

Given such caveats, consumers supported Government involvement in making such decisions even if in some cases the advice might ultimately prove to be incorrect, as long as the likelihood of such instances was 'minimal' (in the groups we talked about being right in 99% of cases), and the Government has not unduly steered consumers to one option.

6. Call Centre Mantra

The Case Study

Although it is illegal to intercept telephone calls in the UK without legal authority, it is acceptable for companies to record telephone calls with customers without necessarily informing them in advance as long as the information is not stored for any length of time. Despite this absence of a legal requirement, most companies do in fact inform customers at the start of each call that they may be recorded. This is done partly in order to provide consumers with information that may be useful to them. However, given the consumer has little option in such cases but to continue with the call, it is arguable how useful such information is to a consumer, especially in the light of the fact that in many cases consumers are paying to hear the information.

The research looked to explore consumer opinions around this issue, how valuable they felt the information was to them, and if it was valuable, how it could be communicated in an effective yet cost-efficient way.

A limited cause of concern to consumers

This particular case study was only covered briefly at the end of most groups. As a result the groups were only able to explore consumers' top of mind impressions, rather than any more thoroughly considered opinions.

Key to the discussion was the finding that while such a 'call centre mantra' was annoying to a majority of consumers, such annoyance was minimal compared to being held in a queue in the first place. It was true that in many cases consumers are paying for the call, but the 'cost' of having to listen to the information for a few seconds was minimal compared to being held in a queue for 5 or 10 minutes.

*"They should tell you every time – it only takes a couple of seconds."
35-54 high income*

As a result the information was not something that consumers had paid too much attention to before. No one had ever hung up on a call as a result of being told their call may be recorded and for many, especially the younger consumers, it was simply 'ubiquitous' and part of the call centre wallpaper.

As with other Case Studies discussed, there was general misinterpretation of why the information was offered – most felt it was there for the company's benefit, or to 'warn' customers not to be verbally aggressive or abusive. Few if any felt it was there for their own benefit.

Ways forward

While few had paid any attention to the information, and none had actually 'acted' on it, views were mixed over whether it should be retained. For some it served little purpose, and as they assumed they might be recorded in the first place, they would not mind not being told each time they called. A sizeable minority of others though felt it an unarguable right that they be told each time they may be recorded.

One potential 'half-way' house suggested was that consumers are informed their

calls may be recorded, but are informed of this just once, at the start of the relationship. This might be in Terms and Conditions, or at the time of the first phone call (for instance with bank customers). This option was seen as acceptable by those who were not that concerned with the information in the first place, but was not seen as sufficient by the sizeable minority concerned over their rights to privacy.

7. Recycling

The Case Study

Currently there is no statutory obligation on manufacturers in the UK to include particular recycling labels on packaging. Despite this, many manufacturers do include them as a matter of course. Different manufacturers though make use of different logos and symbols, and as a result there is no consistent basis for consumers to consider when making their purchases.

The group discussions looked to explore, within this context:

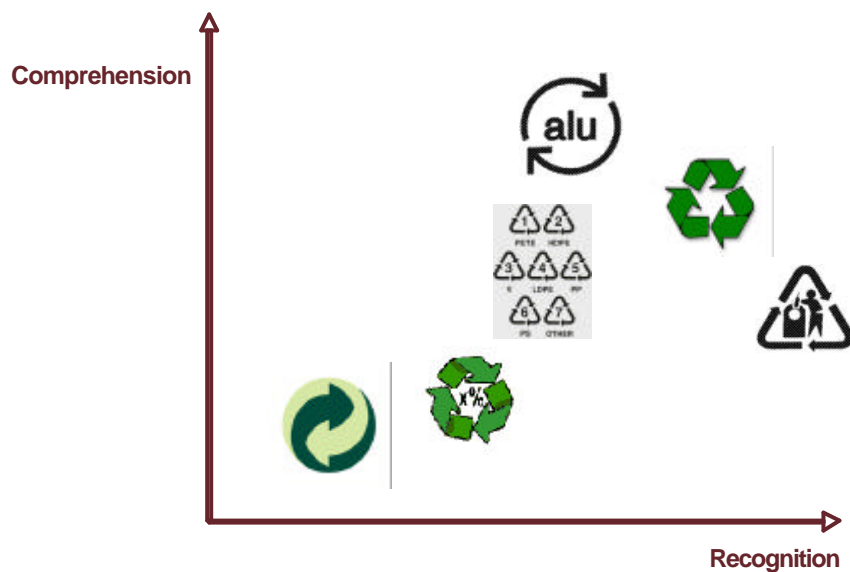
- to what extent consumers recognised and understood various recycling logos
- the role these logos played in their shopping behaviour, and also their domestic recycling behaviour
- what information they use in the course of their recycling behaviour
- in light of this, how packaging information could be framed in order to maximise its usefulness to consumers, and increase general recycling rates

Overall Consumer Confusion

Three clear themes emerged when talking to consumers about the role information plays in their recycling – there was much confusion, and when looking for guidance they relied on their Councils. Those two findings contributed to the third – that recycling symbols on packaging have a minimal impact on most people.

The confusion was apparent in reaction to the symbols displayed in the groups. Most knew the aluminium recycling logo (which is almost self-explanatory), and most could interpret the simple 3 green arrows recycling loop (even if they were not totally familiar with it). Others though were less clear. There was confusion over whether the Tidyman logo presented referred to bottle banks specifically or just litter in general, the “Gruene Punkt” (bottom left hand corner of the chart below) was unrecognised, the ‘made of x% recycled material’ was more often than not felt to mean x% of it could be recycled, and the full raft of plastics recycling logos went over most people’s heads (“*to us, plastics are plastics*”). Even those respondents who felt they did ‘quite well’ in the mock test actually did quite badly.

Mapping consumer comprehension vs. recognition of various symbols



This lack of recognition was perhaps unsurprising given few, if any, of our consumers actually looked out for the logos when shopping. Such information played little role in guiding their purchases, and in fact the mantra ‘reduce’ may well have had more impact on *purchases* (in terms of preferring products with less packaging) than ‘recycle’.

“It’s no good telling us what we can recycle, it’s trying to stop the stuff we’ve got to recycle in the first place that’s the important thing.”
Pensioner, high income

In the group exercise where a variety of groceries were passed around and consumers asked to note any packaging information they might look out for when shopping, there was more frequent mention of healthy eating issues such as salt content than any recycling symbols.

Furthermore, in common with other Case Studies, when prompted, consumers felt the recycling symbols were there as much for corporate purposes (‘greenwash’) as to help consumers. No one brand was felt to have achieved a position as ‘recycling champion’, although there were isolated mentions of the Co-operative supermarkets as doing more than most.

The absence of an active role for the logos was carried back into the home. Almost everyone in the group recycled, with little sign of reluctance a wide range of materials – paper, card, glass, cans. Recycling of plastics and composting were less common.

Knowledge around what can be recycled however, was summed up by the self-confessed ‘hopeful recycler’:

“Well I'm not sure whether it is or not, I'm hoping it is because I believe in it, but there is nothing really to tell us properly if it is recyclable”.
Pensioner, high income

For information and guidance people primarily referred to the Council guidelines (a leaflet or details on the wheelie bin etc), topped up (or contradicted) by word of mouth, and reinforced by the Council sometimes refusing to empty the bin. So people generally knew the basics, but were often confused around the edges:

- can you recycle magazines as well as paper?
- what about shredded paper?
- do I have to take tops of plastic milk bottles?
- I used to recycle plastic meat containers, but then my son told me I couldn't.

“Some plastic the Council seems to leave, so I'm not always getting it right.”
18-29 medium income

A broad-brush approach to recycling

Consumers were very much seen to take a *broad-brush* approach to recycling. They tended to recycle plastic bottles rather than plastic bottles with a '1' or '2' logo on them, plastic containers rather than plastic containers with a '5' or '6' on them, and drink cans rather than drink cans with an aluminium logo on them.

“As far as most of us are concerned, plastic is plastic isn't it?”
Pensioner, low income

There appeared to be two main reasons why little attention was paid to logos/guidance on packaging. Firstly many people did not have the time or inclination to check each individual item before recycling. Secondly, in the main area where logos could solve confusion – plastics – consumers believed Council guidance (which they abide by) seldom referred to or equated to the system of individual plastic logos.

In the example of Plymouth City Council, where two of the groups were held, the advice for plastic household recycling is that the Council accepts:

“Plastic bottles (please remove tops and place separately in your green recycling container), plastic containers (e.g. yoghurt pots and margarine tubs) – please rinse out.”

The Council guidance does not refer to packaging symbols, and so neither did consumers. There clearly are some Councils who do offer guidance based on symbols (e.g. the Borough of Poole), but we believe them to be a minority and none of the groups were conducted in such areas. As a result we are confident the conclusions of this research are relevant to a majority of the country.

The sense that consumers in the group acted on broad-brush guidance rather than specific packaging information was reinforced in terms of aluminium cans. Most thought all cans in the UK could be recycled (informed exceptions including metal detector enthusiasts or those who had been told personally by a Recycling Officer), and in any case there was no evidence of discrimination at the point of recycling based on symbols.

The impact of information on behaviour

Encouragingly the confusion over packaging symbols was not seen to have any detrimental effect on the level of recycling. The 'hopeful recycler' was more prevalent than the cynic (if in doubt, don't put it out). People were seen to err on the side of hopefulness, and then learn from their mistakes – the Council not emptying their bin, or leaving the contraband packaging behind.

In terms of the role packaging information *could* play in consumer behaviour, there was greater consumer support for 'macro sticks' rather than 'micro carrots'. Consumers suggested forcing supermarkets to use less packaging rather than asking consumers to choose between products, and forcing manufacturers to make all cans out of recyclable aluminium rather than asking consumers to differentiate etc.

"If there is a different grade of plastic and you can use two and you can't use the other one why? Why isn't the third one made of plastic you can re-use so every plastic bottle goes in the plastic bloody bin! Simple."

Pensioner, low income

Additionally there is the argument that the greatest impact on raising recycling rates would be for more Councils to accept more materials. Once this is done there could be a role for packaging information, but (again) it must be broad-brush and also *active* rather than just *informative*. Broad-brush means one system for all Councils and all packaging, and simpler approaches e.g. all plastic bottles that have a green cap can be recycled, all those without can't.

"I think the manufacturers need to make it more simple, just one symbol that means 'that is recyclable' and that's it."

Pensioner, high income

The need for active rather than just informative was summed up by consumers' reaction to the battery recycling logo.



Many were unaware of it, but the more common reaction to it was that rather than telling you what you *can't* do, it would be better to tell you what you *can* do.

The groups discussed a potential composting logo. The general feeling was that it would have little purpose on the basis of common knowledge – those that didn't currently compost would have no use for it, those that did currently compost knew the basic ground rules anyway. However, it must be said that this is in the context of early stages of composting. At the moment many of those who compost have been doing it for years and therefore know the rules. It could be argued that as composting becomes more widespread, and people are introduced to it that perhaps aren't familiar with the do's and don'ts, logos might have a role to play. However, it is perhaps more likely that beginner-composters would carry over their standard recycling behaviour i.e. pay attention to general Council guidance rather than individual packaging information.

8. Product Safety

The Case Study

Current product safety legislation gives producers and distributors responsibilities and liabilities with regards to the safety of their products. Included in these is the responsibility to provide information and warnings around the risks their products pose, and, where necessary, to provide instructions adequate to consumers' needs as to the safe operation/use of the product. However, it is unclear how often these warnings are read by consumers and it is arguable whether the content, wording and presentation of this information as provided by business attracts consumers' attention to the issue.

With this in mind, the research looked to explore consumer attitudes and behaviour on a number of issues:

- how do consumers assess the risk posed by various products
- how do they access the information or knowledge necessary to mitigate these risks
- how useful is the information currently provided by manufacturers
- how can such information be framed more effectively
- what role could or should Government take in enabling consumers to make informed decisions around product safety issues

Overall consumer attitudes to safety instructions

The overall context was that to a large extent current safety information was seen to serve the manufacturers (as legal protection) as much as the consumers (as effective safety advice), and was anyway largely ignored by consumers.

They did however see products as posing risks and did have a sense of which products posed a higher risk than others. In our groups we asked consumers to rank a number of products in order of the risk they posed to everyday consumers. In approximate order of risk posed, they ranked them as follows:

Higher risk: Extendable ladder
 Sharp knife, toy from an established market stall, electric lawnmower
 Household bleach, electric kettle

Lower risk: Laptop computer, British Beef

To some extent the actual ordering is less relevant. The more interesting finding was that there was little relation between perceived risk of a product, and the likelihood of properly reading the safety instructions (as opposed to just the usage instructions).

For instance extendable ladders and electric lawnmowers were generally supposed to be high-risk items, yet few consumers said they would sit down and read in detail the safety instructions.

*“If you buy a drill I just plug it in and go ahead right away, I don’t see the sense of reading the stuff with it.”
Pensioner, low income*

Although there were a limited number of groups exposed to the Product Safety case study, it was interesting that the one demographic more likely to read safety instructions in detail were pensioners, who seemed to adopt a more diligent approach.

Why safety instructions are seldom read

Consumers believed the reasons they often avoided reading the detailed instructions were two-fold. Firstly, the reason accident levels have not gone through the roof as a result of no one paying any attention to safety instructions was that consumers were seen to make use of common sense and a ‘legacy’ of being told or shown how to use products. People did not need to read the safety leaflet to know not to use an electric lawnmower in the rain, and they knew that toasters should not be used directly below curtains. They did not read the instructions because they felt common sense would be enough.

Secondly, experience had taught consumers that many of the instructions were less than useful, and designed more to protect the manufacturer from litigation than the consumer from accidental harm. We provided an example of Safety Instructions for a well-known brand of toaster. The one page of text included 12 ‘safety instructions’ and 26 ‘important safeguards’. In the groups consumers came nowhere near naming all 38 warnings listed. Furthermore, they felt in total the list was verging on the ridiculous, including warnings such as not to use the toaster on its side or ‘do not use this toaster as a source of heating or drying’. Few would in practice read such instructions, since the core useful content (e.g. ‘use on a stable work top, away from any contact with water’) was generally known, either through inherited knowledge or plain common sense. Furthermore, many believed the point of an exhaustive list was to protect the company from being sued, rather than the customer from being hurt.

As a result, consumers were pretty much at ease with guessing (and therefore knowing) a minority of the 38 safety warnings. They thought probably only 5 or 6 were key, and these they knew already.

*“Keep it away from water...don’t put your fingers in....don’t place it under a shelf or anything.”
Pensioner, low income*

The solutions to making such information more effective – i.e. actually read – was to simplify, shorten and make it more visible. A number of consumers commented that even if they did read safety instructions, they only read the ‘ones in red’ or the emboldened ones.

*“That’s why I don’t read them actually (because of the size of print).”
35-54 medium income*

The idea of stickers on the products themselves with the key warnings was well received, as was the idea of highlighting a *short* list of dos and don’ts - as opposed to hiding the long Toaster list of 38 don’ts in the Instruction Manual. Essentially consumers suggest making it easier for them to opt in to reading them rather than easy to opt out, as was felt to be the current case.

Other safety signals

It was interesting to discuss the role of brands and quality of product in terms of safety reassurance. Consumers did not see a continuous sliding scale of brand reassurance, instead they tended to view brand differences as more black and white - well-known brands (safe) vs. cheap unknown overseas brands (less safe).

Generally consumers avoided the 'cheap unknown', but not always. Hence a consumer in a low-income group talked about a local trader who sold 'dodgy' sofas on the cheap. They may well not stack up against well-known brands in terms of the highest levels of safety, but the consumer was willing to trade-off a marginal reassurance on safety for a real saving on price.

However, the brand reassurance was as much about quality as safety. There was no evidence that they would read the safety instructions for an unknown brand but not for a well-known one (whose brand name offers more reassurance).

Symbols were seen to have less of an impact.



No-one in the groups recognised (or looked for) the Lion Mark for children's toys, and while the kitemark was more widely recognised, only a minority considered it when buying products. That is not to say it had no value, just that it was seen to have limited value in affecting purchase decisions. The CE (Conformité Européenne) mark fell somewhere between the two. Some (but not many) consumers recognised it, but they saw it more as a general 'standard' or 'mark' rather than any form of reassurance. Taken as a group, the symbols were not widely recognised and so had limited effectiveness in consumers' eyes.

9. Extended Warranties

The Case Study

Extended Warranties (EW) are offered as additional protection, or insurance, for goods purchased. There is evidence that consumers find it difficult to decide whether or not it is in their interests to buy an EW, and that when they do, they do not understand the terms and extent (or lack of) of the cover being purchased.

This consumer research looked to explore a number of areas:

- how consumers felt about EWs generally
- how confident they were that they were making 'informed' purchase decisions
- what sorts of information would help them make more informed decisions
- how helpful they found the information retailers are required to provide under the Supply of Extended Warranties on Domestic Electrical Goods Order 2005
- how such information could be framed to enable consumers to make more informed purchase decisions

On a technical note, the discussion groups focused largely on the regulations of extended warranties for the Domestic Electrical Goods market rather than other goods such as furniture. However, while the following findings apply to the regulated goods, consumers would apply most of the conclusions to the unregulated market as well.

N.B. The objective of the Supply of Extended Warranties on Domestic Electrical Goods Order 2005 was to increase competition in the market for extended warranties through the provision of information to consumers. This information applies to warranties sold in-store as well as on the internet. This research studied the impact of this information on consumers.

The overall consumer context

One thing that became apparent fairly early on in the research was that, as far as consumers were concerned, Extended Warranties were not an especially contentious consumer issue. A few had heard of media reports around the issue, but there was limited vexation in the groups themselves. This would seem to be a result of two issues.

Firstly, the purchase of extended warranties was to some extent a self-selecting process. On the whole those consumers who thought they were a rip-off chose not to buy them, and many of those who bought them on the whole valued the peace of mind they were seen to offer. There was a third group of consumers who felt they were coerced into buying them, but they were a minority and were not concentrated in any one demographic group, for instance low income households.

Secondly, consumers were mainly unaware both of the profit levels being earned by the main retailers from EWs or of the recent history of Office of Fair Trading and Competition Commission investigations. Personally considering an £80 Extended Warranty (EW) a 'rip-off' did not translate into a view of the extent of 'abnormal profits' the industry might be making

Taking the ‘self-selecting’ characteristic in more detail, the three more common (but by no means exhaustive) situations we found were those who never buy them, those who often buy them, and those who are easily persuaded.

Never Buy	Easily Persuaded	Often Buy
<ul style="list-style-type: none"> ● Think EWs are a rip-off ● Never buy them on principle ● Accept product ‘might’ break ● But believe it’s often cheaper to just buy a new one 	<ul style="list-style-type: none"> ● Recognise it’s a ‘hard sell’ ● Don’t always intend to buy ● But often cave in under pressure ● Not just ‘vulnerable’ groups – across all demographics 	<ul style="list-style-type: none"> ● Prefer the peace of mind EWs can bring ● Buy EWs ● Don’t consider themselves ‘ripped off’

There was widespread recognition within the focus groups that the ‘hard sell’ did exist with EWs. Whether or not consumers went ahead and bought one, there was common reference to pressure from sales staff, a feeling of exhaustion or not wanting to look stupid (among the low literacy consumers), and sales staff not taking ‘no’ for an answer.

In the groups consumers were asked to fill in ‘bubble diagrams’ to describe how they felt at the point of sale when an Extended Warranty is mentioned. One typical response included the following exchange:

Salesperson: ‘*You need this warranty, it will only cost you this much, soft touch here*’

Consumer: ‘*Being ripped off, can I afford this? Do we really [need/want] this? Just sod off.*’

The Consumer Impact of the Supply of Extended Warranties on Domestic Electricals Goods Order 2005

Despite the suggestion that consumers did not appear to consider Extended Warranties a contentious issue, the research certainly suggests all was not as it could be. No-one in the groups (albeit a small sample) had purchased a warranty from a third party, no-one was even aware that you could, and the only information consumers remembered being given at the point of sale was an outline of the benefits of the warranty itself.

“(On suggestion you could buy a warranty from a third party) *Didn’t know you could do that*”.... “*No, didn’t know you could do that.*”... “*Why would you do that?*”
Pensioners, high income

In addition:

- there was a lack of understanding of fundamental Statutory Rights – most thought they lasted 28 days in all cases

- consumers remembered receiving 'small print' at point of sale, but seldom read it (they view it as Terms and Conditions protecting the company rather than the consumer)
- in essence there was no 'comparison' made regards value for money between warranties since no-one was aware that extended warranties were available elsewhere. The only comparison made was a mental trade-off between the cost of the warranty and the cost of having to buy a new product if it broke
- the 'hard sell' was seen to still continue, with some consumers not feeling confident enough to resist – manifested among the low literacy group as an unwillingness to appear 'stupid'
- and there were isolated (though only isolated) instances of problems with claiming on existing policies

One further issue regarding the price of extended warranties was that some consumers took into account the relative cost of replacement against taking out a warranty and decided it was easier to simply buy another kettle/TV/DVD player if the first one went wrong. There are many factors of varying influence at play in the decision to 'throw away' rather than repair electrical goods, but in the groups it seemed that the price of Extended Warranties was one of them.

Consumers in the groups supported the intentions of the 2005 Order. They considered all the individual elements of the Order (being told they can buy it elsewhere, being informed their household insurance may offer protection etc) to be useful. The usefulness of being told about Statutory Rights and the role of extended warranties was predicated on consumers understanding what those rights were. Yet consumers did seem sincere in their assessments of the value of other elements of the Order, since they were quick to dismiss those they thought were not useful (namely long detailed information of what is covered, and data on the likelihood of product failure). For instance, while few knew you could get warranties from third parties, they were quick to recognise the benefits of being able to – namely that you might be able to get it cheaper elsewhere.

However, an underlying issue was to be found in reactions to two other elements that were also tested at the same time. Consumers were asked to categorise 'A *short guide to some everyday cases that would be covered, and some that would not*' and '*Detailed information about every eventuality that is covered and each that isn't*' as useful or not useful, in terms of making informed decisions about extended warranties. An overwhelming majority chose the shorter version. At the point of sale they did not want to plough through detail and small print, as is currently perceived to be the case. This might be why the current Order was seen to be having little impact on helping consumers make informed decisions. Retailers were not seen to be *communicating* its contents, they were simply providing the detail in a form that made it unlikely that consumers would actually take it in. Consumers could only recall sales staff talking them through the benefits of the warranty, rather than any of the consumer information contained in the 2005 Order.

When shown one High Street Retailer's extended warranties document they picked on some of its contents as useful, but criticised the format as off-putting (lots of detailed small print).

The solution is that consumers asked for the helpful information the Order insists on

to be communicated in a different way – for most this was verbally at point of sale, for others it was in a summary display at the counter, and for most it was also in the form of a short, simple take-home leaflet.

“I would like the warranty to be in a form that we can read it without getting a magnifying glass.”

Pensioner, high income

The important thing was that it is pro-actively provided in a concise user-friendly format rather than passively provided in a relatively inaccessible format.

10. Scores on the Doors

The Case Study

The Food Standards Agency (FSA) defines 'Scores on the doors' as a scheme where food hygiene information is made available at point of sale, supported by web-based information systems. The FSA is sponsoring pilots which will run for up to two years in three groups of local authorities – London (x33), Midlands (x5) and Scotland (x5). The pilots will test different models within a framework of principles developed to inform an Agency recommendation for one preferred scheme nationwide. Our groups looked to explore issues such as:

- consumer assumptions about current food hygiene safety inspections
- reactions to the publication of inspection results
- how such information should be framed, and what use consumers would make of it
- the value or otherwise of publication of wider regulatory information

Overall reaction to the scheme

In keeping with earlier Food Standards Agency research, there was a almost unanimous support for the idea of publishing 'Scores on the Doors'. Even with only the briefest explanation consumers immediately took to the idea, and recognised one of the intended benefits – that it would drive up standards. Encouragingly this support was consistent across all consumers, from those that devoted a lot of household income to dining out, to those that only went to the local pub for a Sunday lunch once in a while.

Importantly, the scheme was seen to bring a much more structured approach to assessing hygiene in food outlets. As it stood, hygiene did not play that large a role in deciding where to eat – consumers took it as given that most restaurants and other food outlets they visited were hygienic. Many double-checked this assessment when they went in (by looking at the floor, cutlery or more commonly the toilets), and would leave if they were in any doubt ('you can just tell'), but unhygienic standards were thought to be the exception rather than the rule.

*"I've been in a couple of cafes before and just looked and the place and thought 'Nah, I can't eat here!' and walked right back out of the door again."
35-54, very low income*

The pilot scheme was felt to bring this information into the public domain in a very accessible and empowering format.

Estimates of the proportion of outlets that are assessed as 'high risk' were surprisingly accurate. FSA statistics suggest around 11% of food outlets pose a high risk to public health, and consumer estimates usually ranged between 10% and 20%. At odds though with the FSA inspections were consumers' lower levels of tolerance – the consensus was that if an outlet posed a risk to public health it should be closed down until it had raised its standards, or at least given a fixed window to improve or close.

*“Well if they don’t pass, wouldn’t they be closed or something?”
35-54, very low income*

Situations where an outlet could remain open despite a ‘minor non-compliance’ were hypothesised as ‘a crack in a tile’ or ‘dust on a shelf’ – technical non-compliances rather than substantial ones.

*“If it’s a bit of dirty underneath a cabinet or whatever, I mean you can live with that.”
35-54, low income*

Anything more substantial, and consumers felt closure/final warning was warranted.

In line with these low levels of tolerance was a lack of sympathy for any establishment falling foul of the ratings. In the words of one consumer “*with regards to public health, there should be no such thing as an off-day*”. While many felt outlets should be given a ‘window to improve’ after any critical assessment, the ultimatum at the end of the window would be the same – improve or close.

In essence consumers were suggesting they *knew* there were outlets that posed a risk to public health yet were still open, but that they felt the inspection system should be looking to close these down, or at least force immediate improvements. Since they saw little real additional cost to being hygienic, they saw no reason why all outlets, be they haute cuisine or local greasy spoon, should not come up to scratch.

Detailed assessment of a Pilot Scheme

For the purpose of the group discussions, an example page from the Birmingham City Council scheme was used to give an outline of how the scheme might work (www.scoresonthedoors.org.uk).²

Once the scheme was outlined, for a majority of people the natural extension of the website would be physical scores on the doors. On numerous occasions the suggestion was made spontaneously, but in most other cases it was still widely supported – outlets should display their ratings and allow the public to make their own informed decisions. Consumers felt it would have a beneficial effect in terms of raising standards, and it was felt it would obviously help those consumers, of all ages, who are not online. Even in a hypothetical instance of their favourite local café receiving a low rating and facing dire consequences if forced to display it, consumers generally took the view that it would be tough but fair.

The pilot used in the groups was the one run by Birmingham City Council – which rates outlets out of 5. The website itself was felt to be a great idea (even when a modest cost was factored in), but a couple of executional caveats were made – one system should be used across the country, and an explanation of what 5 stars meant compared to 4 stars, 3 stars etc would be invaluable. In practice, they interpreted the star system as follows:

- 5 stars – you could eat off the floor it’s that clean
- 4 stars – reassuring and acceptable
- 3 stars – would raise questions, and in most cases would make you think twice

² N.B. this scheme is not one of the Food Standards Agency pilots for their evaluation

- 2 stars or below – would simply not use (except for exceptional circumstances, such as a late Saturday night kebab on the way home)

The pivotal point was seen to be 3 stars out of 5. In effect a rating at this level would make them search for another more compelling reason to use that outlet. If they knew the restaurant they said they might still go, but would maybe gently ‘rib’ the proprietor about the rating; if it was a restaurant they were not familiar with, they would be much less likely to go ahead and use it.

Importantly, although many (especially non-internet users) felt the information should be available offline as well as online, many of these still saw an inherent value in the scheme, and felt that it should still go ahead even if a purely online presence was the only option.

Potential use of the scheme

In such circumstances (a group discussion where a concept has just been provided in outline) it is impossible to accurately predict how often people would refer to such ratings online, but a consensus did seem to emerge. Use of the ratings was seen to fall into two groups – special occasions and curiosity.

- Pre-planned, special occasions e.g. Birthday meals. Consumers said they would look up ratings online before confirming, and would be likely to veto what they consider to be low ratings (3 or less out of 5)
- ‘Regular haunts’ e.g. local pub. These they would look up ‘out of curiosity’, but without any time constraint (they might look it up in a week, a month or later, but would still use it in the meantime). They would be unlikely to return in the case of a low score (1 or 2 out of 5), but in the case of a score of 3 they would still frequent it, but with a much more questioning approach (and therefore might be more likely to be find a reason not to go).

The role of peer-to-peer websites

In order to explore further the potential of regulation by reputation, peer-to-peer websites such as www.toptable.co.uk or www.referenceline.com were discussed. Within the discussions, it was very interesting to see that consumers took them with a pinch of salt. Only a handful of our respondents had used them, and more often than not for holidays or travel (such as www.tripadvisor.co.uk) rather than restaurants, but in most cases they regarded them as useful rather than completely reliable.

They recognised their limitations – they’re only as reliable as the people posting reviews – and would often discount average scores if based on only one or two ratings, or ignore negative comments if the balance were positive.

*“I always assume that it’s member of staff who writes them!”
35-54 high income*

*“I think you look down through them all and you take the overall view – you don’t just read one or two, you read them all... because everyone has got different opinions about everything, especially holidays.”
35-54, very low income*

As a result they ventured they would place greater trust in ‘objective’ Governmental hygiene ratings than ‘subjective’ peer-to-peer restaurant reviews. Views were seen

to be mixed as to the merits of presenting Scores on the Doors on a peer-to-peer site compared to simply providing a link, but importantly they saw them as complementary. While peer-to-peer sites were felt to be more wide-ranging in their content than Scores on the Doors were, the latter was seen to be more independent and reliable, and potentially of interest to a wider constituency than currently used peer-to-peer sites.

“If they're (Scores on the Doors) linked in to the City Council I think it gives it a little bit more weight than independent ones where, as you say, you don't know whether they're being corrupted.”

21-34 high income

Wider use of regulatory information

These sentiments were carried over when thinking about the power of regulatory information generally. None of the consumers had any difficulty thinking about other services they would like to see consumer-friendly information and peer reviews for – builders, plumbers, MOT garages etc – although awareness of current options such as www.referenceline.com was limited.

Furthermore, in principle there was more support than opposition for publishing data such as Law Society complaints. However, in contrast to Scores on the Doors, this legal example threw up the prime concern that many of the complaints might lack substance and ultimately be thrown out. Whereas in the case of Scores on the Doors any assessment, however harsh, would be seen to be independent, with consumer complaints to the Law Society people in the groups recognised the potential for unfairness to creep in. There might, they supposed, be complaints published that actually had little or no substance. In this case the evidence would be considered unfair rather than tough but fair.

Solutions suggested included only publishing complaints that had been upheld, or flagging complaints that were as yet unproven, but in either case it pointed to an underlying concern many consumers shared. Overall, consumers in the groups recognised the power of such information, and welcomed a move to greater transparency, but did feel that a scheme such as publishing Law Society complaints would need to be managed carefully.