

# Good practice standards for Digital Comparison Tools

## A - Accessibility

- 1 Information should be clear, precise, relevant, and understandable.
- 2 Information should be presented clearly, prominently and timely.
- 3 Comparison tools should provide contact details, including postal and e-mail addresses.
- 4 Comparison tools should use technical features that enable visually impaired or other disadvantaged consumers to use the device.

## B – Independence and impartiality

- 5 Websites should be independent (not owned, controlled or managed by legal services providers).
- 6 Websites should include easily accessible, clear information about how they are funded including any commercial relationships with legal services providers. This should include information about referral fees where applicable.
- 7 Any commercial influence on the presentation of information should be clearly identified. In particular, featured deals or promotions should be clearly identified as such.
- 8 The websites should provide clear and accurate information about the website itself and its ownership and methodology (rankings, sources of information).

## Enabling good choices

- 9 Websites should include a sufficient number of providers to enable consumers to make a meaningful choice. They should be transparent about their level of market coverage, especially where the site has a limited number of providers.
- 10 Consumers should be able to compare providers on information other than price, e.g. quality and service features.

- 11 Websites should make clear the basis on which a comparison is made. Consumers should be able to sort, filter and shortlist comparison tables according to every field of information present.
- 12 Assumptions made about consumers that are used to generate quotes should be clearly and prominently displayed on websites and at each stage where consumers make a choice so they are aware of the assumptions.
- 13 Websites should advise the consumer where a search result does not match their specific request.

## Accuracy

- 14 The price quoted should reflect the total cost of the work including all mandatory fees and charges. There should be clarity around any excluded costs. Websites should make clear the basis for charging, e.g. fixed fee or hourly rate. The price quoted should be available.
- 15 Information should be correct, up-to-date, and not misleading.
- 16 Results presented should be relevant to the search criteria.
- 17 Limitations in the availability of the results presented should be explained.
- 18 Marketing statements should be factually correct, up-to-date and avoid misleading or exaggerated claims.

## Use of personal information

- 19 Websites should publish a standalone privacy policy which explains their collection and use of consumers' data and what controls consumers can exercise in line with the latest data protection regulation<sup>1</sup>.
- 20 Websites should comply with all obligations under data protection and privacy law.
- 21 Personal information should be collected only when necessary.
- 22 Personal information should not be passed to third parties without the consumer's explicit consent.
- 23 It should be easy for consumers to opt out of marketing communications.

## Complaints

- 24 Comparison tools should deal with complaints professionally and fairly; and provide clear information about how to complain

The Legal Services Consumer Panel has consulted the following document<sup>2</sup> which it highly recommends providers and regulators, and we also referred to BEUC's guidelines on comparison websites.<sup>3</sup>

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<sup>1</sup> [The General Data Protection Regulation \(GDPR\)](#).

<sup>2</sup> [Guidance on Digital Comparison tools, Competition and Markets Authority, 2017](#)

<sup>3</sup> [BEUC, Comparison Websites, 2012.](#)