

Consumer behaviour and ICSS: Exploring how consumers respond to Information, Connection and Signposting Services

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Introduction and Rationale

Linguistic Profiling for Professionals at the University of Nottingham was engaged by the Phone-paid Services Authority to understand consumer behaviours in relation to Information, Connection and Signposting Services (ICSS). ICSS are a form of phone-paid service. A phone paid service is a service which is purchased and charged to a consumer’s monthly bill or pre-paid credit on a mobile phone.¹ There are two main types of ICSS, as shown in Table 1 below.

Table 1: Types of ICSS
Type 1: ‘Call connection’ services which offer connection to a small number of organisations rather than the full range that a national Directory Enquiry (DQ) service provides. In some cases Type 1 services may in addition to connection offer the number the consumer is seeking.
Type 2: ‘Signposting’ and ‘Helpline’ or advice or assistance services (which may or may not include the consumer providing account details relating to an unrelated online account they hold, so that the ICSS provider can interact with the account on their behalf). Type 2 services usually offer consumers the number of one or a small number of organisations (but not onward connection to that number), operator-led assistance, or provide generic, pre-recorded advice via an Interactive Voice Response (IVR) system
(Source: Phone-paid Services Authority, Information, Connection and Signposting Services Notice of Special Conditions

This research focuses on Type 1 call connection services. However, the conclusions and recommendations may have utility for all ICSS,² and more broadly for phone-paid services.

The research was conducted in summer 2017, and used eye-tracking and online survey methods to consider, first, how consumers respond to search results containing ICSS and, second, how consumers respond to ICSS websites. In each case consumers were confronted with call connection type services.³ Over 60 consumers, with an age range of 19-69, contributed to the research. Full details of the methodology can be found in Appendix A.

The research examined two scenarios. In the first, participants examined search results containing both third party call connection services and numbers which directly connected them with the customer service team for the organisation concerned.⁴ In the second, participants were asked to telephone the directly operated customer service number for a range of organisations. They were presented with websites and asked to identify whether they set out this information, and whether

¹ The phone-paid services considered in this report use 0870, 0871, 0872, 0873 and 09 numbers.

² The report does not comment on Directory Enquiries (DQ) Services. However, some of the findings regarding consumer behaviour are likely to be transferable to this context.

³ A call connection service is a service which offers connection to a small number of organisations, rather than the full range that a national Directory Enquiry service provides. In some cases these services may, in addition to connection, offer the number the consumer is seeking. Beyond connection, some added value services may be provided, such as call recording.

⁴ In this research “direct connection” (or any similar phrases) means connection to an official number (controlled by the organisation) using that number directly without any re-routing of calls.

they would use the information to call the organisation. Both scenarios were examined using an online survey and an eye-tracking experiment.⁵

The goal of the research was to first identify consumer behaviour when presented with search results and websites containing ICSS services and second to provide policy recommendations aimed at ensuring that consumers are able to identify ICSS and make fully informed choices about using phone-paid service numbers to access, in particular, customer service helplines of popular service providers. If consumers are unable to identify the service as being provided by a third party then they may not receive the service from the expected source or supplier, and be paying an unknown entity for an additional, unknown, and unfamiliar service, which can be a form of consumer detriment.⁶ Whilst some ICSS services provided added value services such as call recording, a consumer who is unaware that they are accessing an ICSS service is assumed to be unlikely to take advantage of these added value services. By examining both search results and ICSS websites the research presents a rounded examination of consumer behaviour in this area. The project investigated the following:

- How do consumers respond to search results setting out a variety of phone numbers for a particular business (some of which directly contact the business and some of which connect to the business through an ICSS)?
- How and why do consumers decide whether a webpage is a third party ICSS or whether it is a webpage operated by a business who they wish to contact?
- Where do consumers look on webpages, and how does this affect their ability to identify whether a webpage is a third party ICSS or whether it is a webpage operated by a business who they wish to contact?

Analysis of this data led to a number of recommendations to ensure that consumers using ICSS are fully aware that they are using a third-party service rather than a service provided by the business they were seeking to contact. Further, the research has important implications for the concept of prominence as used in consumer law, with the experimental results suggesting that consumers view very little of the content on websites before making the decision to purchase the service offered.

⁵ See Kathy Conklin et al, *Eye-Tracking: A Guide for Applied Linguistics Research* (CUP, 2018).

⁶ Examples of consumer detriment caused by ICSS can be found in the *DK Call Ltd Adjudication* (10th April 2017) page 9. One participant in the research described a particular website as “scandalous” (Survey Participant 1), and other consumers confessed to being confused by the experience.

The Current Regulation of ICSS

ICSS that use 087 and 09 prefixed numbers are currently regulated by the Phone-paid Services Authority ('PSA'). ICSS which use 084 numbers are not currently regulated by the PSA. Consumers in the research believe that ICSS should be regulated. When they contemplate the regulatory regime, they think that the same regulation should apply to all ICSS.

All ICSS providers are required to comply with general consumer law, including the Consumer Protection from Unfair Trading Regulations 2008, which implement the Unfair Commercial Practices Directive. In particular, these provide that traders should not make misleading statements and should not omit to provide material information which the average consumer needs to make a transactional decision.⁷

As well as the general law, premium rate ICSS providers are required to comply with the PSA's Code of Practice and the Special Conditions that are applicable to ICSS. These conditions provide, for example, that:⁸

- ICSS should not engage in imitative marketing. Promotional materials must be distinct from the organisation that the consumer is seeking to contact. A web address must not mislead the consumer into believing that the website is associated with the organisation that the consumer is seeking to contact.
- ICSS should not use techniques that lead consumers to believe that they are providing advice or information that is not already available from a public or commercial organisation (where this is the case).
- ICSS must clearly and prominently state (where this is factually the case) that the information (including the number), advice or assistance provided by the Premium Rate Service is available direct from the relevant public or commercial organisation at no or lower cost. The presentation of this information should be in a manner which is clear, prominent and proximate to the premium rate number advertised, and should include a link to the homepage of the website containing the actual number the consumer is looking for where such a website exists.
- Information that is collected should be necessary for the provision of the ICSS service; consumers should be notified of the data to be collected; and should be notified of the identity of the data controller.⁹

The eye-tracking experiment provides useful behavioural evidence about the meaning of prominence in this context. In general, information is prominent if "it is brought to the consumer's attention in such a way that an average consumer would be aware." An average consumer is "reasonably well-informed, observant and circumspect."¹⁰ The concept of the average consumer has

⁷ See regulations 5 and 6.

⁸ Other conditions apply specifically, for example, to IVR systems, which were not examined as part of this research.

⁹ The obligations are supplementary to the obligations under the Data Protection Act 1998 and, after 25th May 2018, the General Data Protection Regulation.

¹⁰ See P Cartwright "The Consumer Image within EU Law" in Christian Twigg-Flesner (ed), *Research Handbook on EU Consumer and Contract Law* (Edward Elgar, 2016); S Weatherill, 'Who is the "Average Consumer"?' in S Weatherill and U Bernitz (eds), *The Regulation of Unfair Commercial Practices under EC Directive 2005/29 New Rules and Techniques*; and Bram B Duivenvoorde *The Consumer Benchmarks in the Unfair Commercial Practices Directive* (Springer, 2015).

been subject to significant academic commentary, but the role of the average consumer in the “prominence” of mandatory information, and particularly the meaning of “reasonably observant” has not been considered in depth.¹¹

The eye-tracking data shows that consumers participating in the research do not pay great attention to all content of the website. The average consumer in our study only considers a small amount of the information set out on the page, usually in the top-left sextant. Just because information is displayed on the page, and the consumer does not need to scroll to access it, our research suggests it should not be assumed that it is prominent for these purposes.

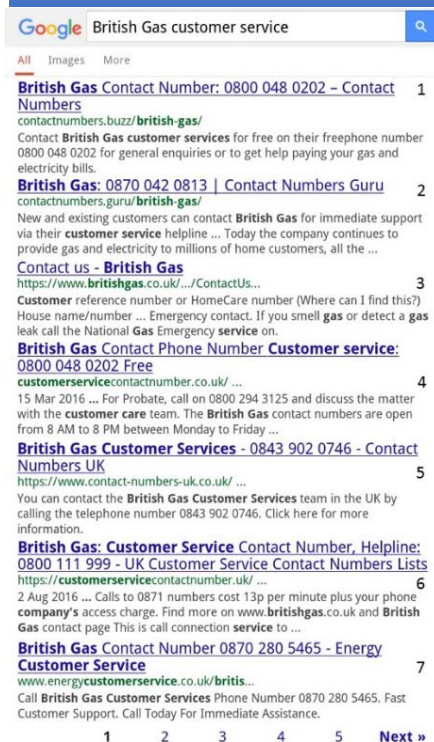
¹¹ Thomas Wilhelmsson talks about the average consumer as a “passive glancer,” and if this is the reality then it may be that greater steps need to be taken to render terms prominent compared to a situation where the consumer is an “information seeker” (another possible model of the consumer proposed by Wilhelmsson) (T Wilhelmsson “Consumer Images in East and West” in T Wilhelmsson, *Twelve Essays on Consumer Law and Policy* (University of Helsinki, 1996), 103). Wilhelmsson’s concept contrasts with that found in the case law, which suggests that an average consumer “will always take note of the information on [a] label” (*Douwe Egberts NV v. Westrom Pharma NV and Christophe Souranis*, opinion of Advocate General Geelhoed of 11 December 2003, para [54]). Is an average consumer a person who will “always take note of the information,” or is the consumer model predicated in something that doesn’t happen?

Scenario 1: The search-page

Consumers often begin their journey to using a third party call connection service using an internet search provider. This search may be conducted either on a computer, a tablet, a mobile phone or other web enabled device. The goal of this part of the research was to identify consumer behaviour in response to search results containing third party call connection services. We wanted to find out what drove consumer choice and why they made the choice of website.

Participants were asked to identify the webpage setting out the number of the customer service helplines of a large organisation. When they managed to identify the webpage of the organisation this was coded as a “correct” choice. They saw web search-results from a popular search engine,¹² as in Figure 1, containing both the direct contact number for the customer service helpline and third party call connection services, and were asked to select what they thought was the company’s webpage.

Figure 1. Example of a search result shown to participants.



¹² For the purpose of this experiment we did not include geotagged search results.

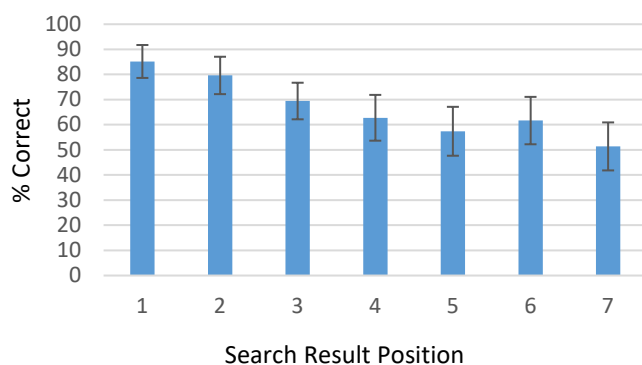
Being at the top of a search-page matters

- Our research shows the lower on the search-page the actual company’s link appears, the less likely it is to be correctly selected (*Figure 2*). If a call connection webpage appears high on the search result the consumer is more likely to select it as affiliated to the organisation that they wished to contact.

This reflects the findings of other research which shows that consumers are more likely to choose a site position higher in the search, often due to implicit beliefs about the meaning of the search results hierarchy¹³ - results at the top of the hierarchy are seen as “better” or more authentic.¹⁴ However, research shows that higher results do not guarantee that the consumer will receive the service that they desire, as the utility of the searched for site can only be determined by its fit with the preferences of the consumer.¹⁵

So if the consumer desires a connection to an official number (controlled by the organisation) using that number directly without any re-routing of calls, choosing a call connection service just because it appears at the top of the search results could lead to disappointment, as the service provided may not accord to the consumer’s preferences.

Figure 2. Selection accuracy based on search position.



Participants were less accurate when the correct search result was lower on the page.

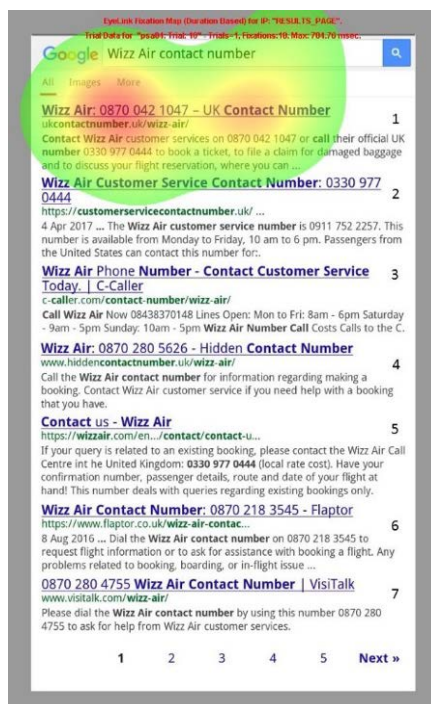
¹³ Wenyu Dou, Kai H. Lim, Chenting Su, Nan Zhou and Nan Cu, ‘Brand Positioning Strategy Using Search Engine Marketing’ (2010) 34(2) *MIS Quarterly* 261.

¹⁴ Jennifer Rowley, ‘Online Branding’ (2004) 28(2) *Online Information Review* 131-138.

¹⁵ Iain Ramsay, *Consumer Law and Policy* (3rd edn Hart, 2012) 47-49.

- The increased likelihood of selection in higher search positions shown by the survey is supported by the eye-tracking experiment. The eye-tracking undertaken shows that people primarily look at the top of a search-page, even when this is not where the searched for company’s link appears, as in *Figure 3*. Figure 3 is a typical result. Here, in this example, the consumer does not look any further than the first search result, identifying that the result sets out a number for the business that they wish to contact, and choosing to enter that site.

Figure 3. Heat-map of a person’s looks to search-page, with red indicating the most



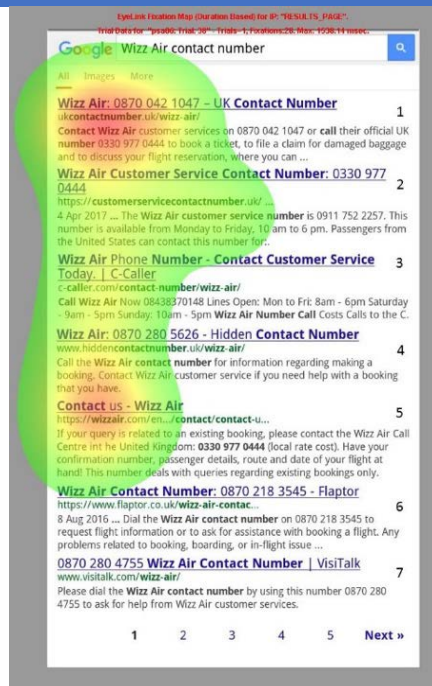
Here the person focused almost entirely on the first result on the page, which was ultimately selected – but was *not* the actual company’s webpage.

The information that accompanies the search result is within the area of attention. However, whilst the information set out on the search page should make clear whether the page is affiliated with the organisation or is a third party call connection service,¹⁶ the participants focused more on the identity of the organisation than the text accompanying the link. Further consideration should be given to enhancing the prominence of this disclosure, so that consumers become aware of it.

¹⁶ ICSS Special Condition 1.

- Even when people in the experiment do look farther down the page, most looks are at the top of the search-page, as demonstrated in *Figure 4*. This is less common than simply focusing on the first result. However, the eye tracking shows us if there are matters which make them decide that the first result does not accord to their preference then they will search further down the page until they find a result that appears to accord to their preferences.

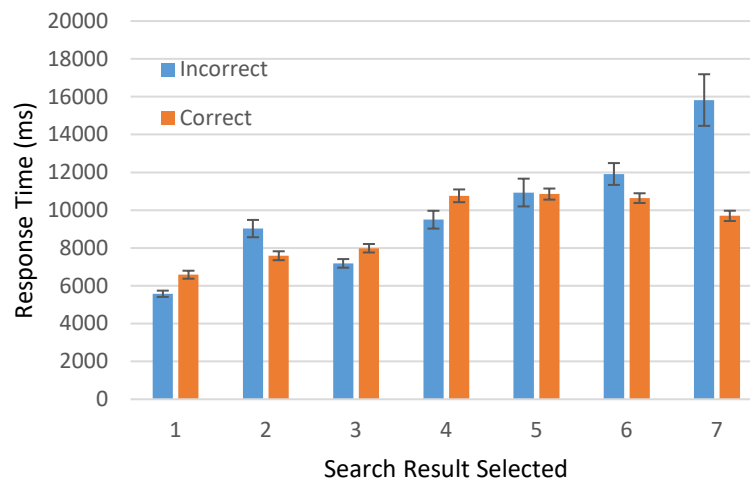
Figure 4. Heat map of a person’s looks to search-page, with red indicating the most



Here the person spent most of their time looking at the 1st result, but then continued down the page until the 5th one. They stopped there, not looking at the 6th and 7th options. The person selected '5', which was the searched for company’s webpage.

- The Eye-tracking experiment shows that people took longer to select a webpage, regardless of whether their response was correct or not, the lower down the selected result appears (Figure 5). Where the information appears lower in the search results, there is more information to sift, and the more likely consumers are to make a choice which does not accord to their initial preferences. Whilst this may seem obvious, other research shows the increased cognitive load resulting from having to search through multiple results (and possibly multiple pages of results, although this was not assessed in the research) increases the likelihood of consumers making an “incorrect” choice.¹⁷

Figure 5. Amount of time to select a link for a searched company for both ‘correct’ and incorrect responses.



Responses took longer if they were lower down on the page, and people were less likely to select the company’s webpage.

¹⁷ Geraint Howells, ‘The Potential and Limits of Consumer Empowerment by Information’ (2005) 32 *Journal of Law and Society* 349; Better Regulation Executive and National Consumer Council, *Warning: Too Much Information Can Harm* (Better Regulation Executive, 2007).

Recommendations:

- It would be beneficial for direct numbers for organisations to appear at the top of the search results. However, this is unlikely to be possible without co-operation from the search providers and the organisations that the consumers are searching for (who may wish to engage in Search Engine Optimisation to push the direct number up the search results).
- Whilst the ICSS special conditions require that sponsored search results “should contain metadescriptions which make the nature of the service clear,”¹⁸ consideration should be given to the possibility of regulating the presentation of this metadescription to make it more prominent for consumers. It may be that further consideration should be given to geotagged results which will always appear towards the top of search results.¹⁹
- Special Conditions require text that appears on the search results page makes clear that the result is for a call connection service, rather than a direct contact number. Consumer education about the meaning of such text should be considered.

¹⁸ ICSS Special Condition 1.

¹⁹ Similar consideration should be given to geotagging, which may artificially inflate the position of a result in a search list.

Scenario 2: Consumer behaviour on reaching the ‘selected’ webpage

As well as examining consumer behaviour in response to search results, a second set of experiments was conducted examining consumer behaviour when faced with websites containing information about customer service contacts. This experiment sought to identify the factors that consumers rely upon in determining whether to use the number presented to them.

Participants were told that they wanted to directly call the customer service number of an organisation. Participants saw webpages, as in *Figure 6*, and were asked to judge whether the number shown belonged to the searched for company or a third-party call connection service. Using an online survey, they were asked to indicate what information they used to make their judgement.

Figure 6. Example of a third-party webpage shown to participants.



The screenshot shows a webpage titled "Contact Numbers Guru" with a green header. The main content displays "BRITISH GAS: 0870 042 0813". Below this, there is a paragraph of text about British Gas, a small image of a blue British Gas van, and a disclaimer box at the bottom.

BRITISH GAS: 0870 042 0813

New and existing customers can contact British Gas for immediate support via their customer service helpline – the phone number is [0870 042 0813](tel:08700420813).

British Gas is the largest energy supplier in the United Kingdom. As well as giving homes gas and electricity, it also offers numerous boiler fitting, roof insulations and other home services.



With a history tracing back 200 years, British Gas was for decades a government-run venture. In 1986 the company's privatisation was in itself historic, raising billions for the British treasury. Today the company continues to provide gas and electricity to millions of home customers, all the while promoting economisation of energy for both households and businesses.

DISCLAIMER
Contact Numbers Guru is a telephone directory and call routing service and is not affiliated with any of the businesses listed inside.
Calls to our 0843 numbers cost 7p/minute and our 0870 numbers cost 13p/minute, plus your phone company's access charge.
The official contact number for each company featured can be found in the public domain or on their official website.

Accuracy in attributing webpages

- *Online survey* accuracy was 70.05%.
- *Eye-tracking study* accuracy was 87.5%.

The participants in the online survey were more diverse in their ages, level of education and tech-savviness than those in the eye-tracking study. Accuracy in detecting third-party webpages was lower in the more diverse group. The online survey group were able to identify third party call connection services around two thirds of the time. In order to understand how consumers make these choices participants in both the online survey and eye tracking studies were questioned regarding their decisions. When the participants identified a call connection service as directly connecting to the business, it tended to be because it “looked right”,²⁰ was “well-written” and “specific”.²¹ When they identified a site as not affiliated to the organisation that they wished to directly contact they identified that the website included “inappropriate” content,²² that the language is “bad and in lower case”,²³ and that the layout “just seems wrong”.²⁴ These consumers either did not see or did not act upon statements that the call connection service was not affiliated with the organisation, and failed to utilise information like the phone number or the url to identify the website as a third party connection service.

²⁰ Survey Participant 2.

²¹ Survey Participant 3.

²² Survey Participant 13.

²³ Survey Participant 15.

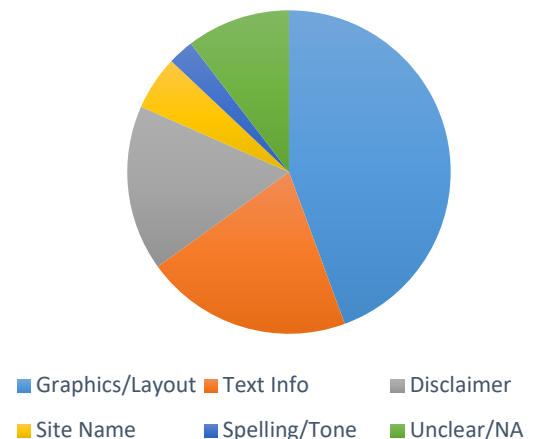
²⁴ Survey Participant 48.

What do consumers look at when asked to determine whether to use the phone number?

Participants revealed that:

1. Graphics and layout are the most important factors in determining their choices (whether or not their choice correctly identified the website as a third party call connection service or not).
 2. General information on the page is the next most important factor. Some pages included in the study contained telephone numbers of different departments, a general description of the services offered by the organisation in question, or, in some cases, the history of the organisation. The more that the webpage looks like it might be affiliated with a company (even if it does not imitate their marketing) the more that the consumer is likely to utilise the number on the website.
 3. Statements that the website is not affiliated with the organisation searched for or that there are free or cheaper mechanisms for contacting the customer services department rank third among the aspects that participants use to determine whether to call the number.
 4. Site name and the spelling and tone of the webpage were the fourth and fifth most important respectively.
 5. Some people did not provide an explanation or they were unclear.
 6. Most consumers do not look at the code prefix (08; 09; etc.) of the phone number in order to identify whether the website is operated by a third party.
- Taking this together consumers are influenced by the “slickness” of presentation of a website. If a website appears hurriedly constructed, with “unprofessional” looking graphics or layout,²⁵ “dodgy English”²⁶ and unexpected tone then a consumer is unlikely to use the number set out on the website. On the other hand, consumers are more likely to use the number on a slick website which “looks legitimate”.²⁷
 - Graphics and layout are mentioned 42% of the time as reasons why third-party websites are incorrectly judged as being affiliated with the companies or organisations mentioned. Participants chose to use the number based on things like: “it’s the official logo”²⁸ or “doesn’t look cheap and tacky”.²⁹

Figure 7. Factors motivating attribution of a webpage to a company vs. third-party, regardless of whether the answer was correct or not.



²⁵ Survey Participant 5; Survey Participant 23; Survey Participant 24; Survey Participant 37.

²⁶ Survey Participant 1.

²⁷ Survey Participant 11.

²⁸ Survey Participant 14.

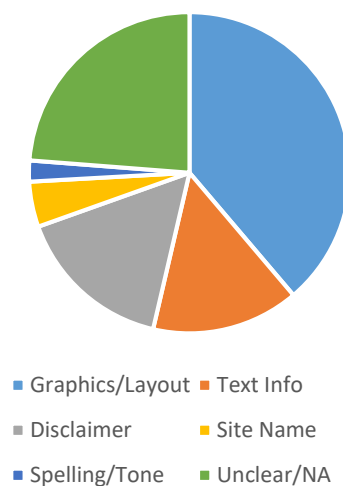
²⁹ Survey Participant 8.

When people *correctly* identify third-party webpages, what do they think allows them to do so?

Where participants identified a webpage as a third party connection service and declined to call the number the following factors were most often cited. Graphics and layout is again the most important factor relied upon by consumers when deciding not to call the number set out on the webpage.

1. graphics and layout
2. disclaimers
3. text, for example misspellings and grammatical errors

Figure 8. Factors motivating attribution of a webpage to a company vs. third-party when the answer was correct.



Recommendations:

- Third party logos should look significantly different from a company's and/or have other very obvious differences. The prohibition of imitative marketing in the Special Conditions is clearly necessary.³⁰
- Text should not mimic an actual company's website, either by directly copying text or by imitating text. Thought should be given to ensuring that disclaimers are more often relied upon by consumers. The evidence from the eye-tracking study reported below suggests that this could be ensured by altering the position of the disclaimers on the page.
- Thought should be given to how consumers are educated that aesthetic factors, such as the graphics or the layout of the website, are not necessarily a determinative factor in deciding whether a phone number is affiliated with an organisation.
- Thought should be given to ensuring that consumers pay attention to the different phone number prefixes, in order that they can make an informed choice. This may be a particular issue with ICSS, where the goal is the connection provided, and this may lead to focus on the identity of the organisation rather than the phone number.

³⁰ Imitative marketing is prohibited by ICSS Special Conditions 4 and 5.

Where do consumers look on ICSS webpages?

A further experiment examined consumers' behaviour using eye-tracking on webpages. This allowed us to see what consumers looked at when confronted with a website, and how this linked to their decision-making when choosing to call the customer services number or not.

Consumers tested in the eye-tracking experiment tended to look at the left-hand side of the top third of the landing page of the site.³¹ This was the case whether the page was presented in desktop or mobile layout. In a mobile layout less information may appear in the upper left sextant of the webpage, meaning that consumers take in less information. Previous research suggests that the average consumer, at least in these decisions, is a "passive glancer", who makes decisions based on the overall impression derived from a quick glance at a webpage.³² This is in contrast to the model of the consumer who is an active and critical information seeker,³³ which research suggests is not the usual approach of consumers when making decisions about purchasing via websites. These research findings are reflected in the findings of the eye-tracking research.

Most consumers did not look at the url of the website, despite this often being a useful indication of whether the number is provided by the company that the consumer is seeking to contact or is provided by a third party.

Table 2 sets out the skipping rate of 5 different areas of the websites presented to consumers. As noted above a disclaimer is the text required by the PSA Special Conditions that apply to ICSS. A disclaimer should state that "advice or assistance... is available direct from the relevant public or commercial organisation at no or lower cost."

Disclaimers and main numbers – not looked at

- Disclaimers are *ignored* approximately 95% of the time. The main phone number is ignored at a similar rate.
- However, when people do look at the disclaimer or the main phone number, they then pay relatively more attention to them than to other areas of the screen.
- Even if the main phone number is noticed, the survey research, discussed above, suggests that consumers do not take the number into account in determining whether to use the service. As suggested above this is likely because consumers either do not know the price of particular numbers or because they have already made up their mind to call the number based on other factors.

Table 2. What people fail to look at, or skip on a webpage.

Area of screen	Skipping rate
Disclaimer	95.34%
Main Number	95.24%
Logo	40.63%
Text	39.65%
Banner	13.25%

³¹ Therefore, if the initial landing page for a website is not at the top of the page the following should be read to refer to the top left sextant of the landing screen.

³² Thomas Wilhelmsson "Consumer Images in East and West" in T Wilhelmsson, *Twelve Essays on Consumer Law and Policy* (University of Helsinki, 1996), 103.

³³ Geraint Howells, Iain Ramsay and Thomas Wilhelmsson, 'Consumer Law in its International Dimension' in Geraint Howells, Iain Ramsay and Thomas Wilhelmsson (Eds), *Handbook of Research on International Consumer Law* (Edward Elgar 2010), 12.

- In summary, *disclaimers and the main phone number almost always go unnoticed*, but they do keep people’s attention on those occasions when they are looked at.

Banners and logos – looked at

- Banners are looked at almost 87% of the time, and corporate logos (when not located in the banner itself) are looked at approximately 60% of the time.
- If banners and logos contain mistakes or things that are easily identifiable as ‘wrong’ people will often (42.11%) pick up on this. This will lead them to choose not to use the number presented on the website to call.

Consumers in the research looked in the top-left sextant, and particularly at the banners and logos that appear there. It is the information that appears in this sextant that influences consumers in their decision whether to call the number. Once the decision is made (perhaps because the top left corner of the website is ‘slick’) it is difficult to displace this decision, an example of status quo bias.³⁴ They do not tend to heed the disclaimer if they even look at it. Therefore, it is best to place the disclaimer in a position where a consumer will see it before the decision is made.

Recommendations:

- Disclaimers should be clear and at the top of the webpage, ideally in banners.
- Banners and logos should clearly indicate third-party webpages.

Figure 9. Heat-map of a person’s looks to search-page, with red indicating the most



Here the person only looked at the banner and logo, which is a typical pattern.

³⁴ Daniel Kahneman, Jack Knetsch, and Richard Thaler, ‘Anomalies: The Endowment Effect, Loss Aversion, and Status Quo Bias’ (1991) 5 (1) *Journal of Economic Perspectives* 193–206.

Demographic Factors

The research sought to test average consumers. Population size for most demographic factors was insufficient to discern statistically significant trends in either the survey or the eye-tracking. However, interesting trends were identified that could form the basis of further fruitful study, and other demographic factors which did not show significant effects may be considered in future with larger populations:

- Those who identified themselves as less technologically literate were less likely to make correct decisions about either search results or websites. This suggests that self-identified less technologically literate consumers might be more vulnerable than the average consumer. The research did not include anyone who identified as a complete technological novice, and therefore it is impossible to draw conclusions about the effect of ICSS on such persons.
- Age and gender showed no significant effects on the “correctness” of results.
- Education level showed no significant effects on the “correctness” of results.
- All the participants had English as a first language.

Conclusions

The research has demonstrated that consumers may inadvertently choose to use a call connection service offered by a third party whilst believing that they are directly contacting the organisation that they are seeking to contact.

- Consumers may believe that they are directly contacting an organisation when in fact the contact is made through a third party call connection service.
- When searching for the number of the customer service department of an organisation a consumer will tend to favour results that appear higher on the search results.
- When examining a website containing a number to call the customer service department of an organisation via a third party call connection service, consumers will make the decisions to call the number based on the “slickness” of the page. The more legitimate that a page looks, the more likely that customers are to judge that the connection service is affiliated with the organisation that they wish to contact and to utilise the number.
- The decision to utilise the number set out on the page is made quickly, based on first impression drawn from graphic, layout and overall “slickness” of the website. Consumers often do not consider any disclaimer, the url or the phone number that appears on the page.
- The eye tracking experiment on webpages suggests that consumers primarily consider the information that appears in the top left sextant of the landing page. They are much more likely to skip information that does not appear in this sextant. If information that looks “right” (particularly because it has the quality of “slickness”) appears in the top-left sextant then consumers will often make a decision to use the number presented. If information that looks “wrong” appears in this sextant or if information that clearly identifies that the website is not affiliated with the organisation that consumers are trying to contact appears in this sextant, then consumers will often choose not to use the phone number presented on the website.
- Consumers do not appear to be aware of the different types of premium rate phone numbers, or do not appear to be aware of how price of a phone call may vary depending on number. They do not use the number as a factor for determining whether they are directly contacting the organisation or contacting the organisation through a third party connection service. The research shows consumers are not aware of the different regulatory regimes that apply to differently priced call services, and believe that regulation should be the same for all ICSS services. The research suggests that ICSS, which cause consumers to take similar decisions whether they are offered by Premium Rate Services or by charged services below the premium rate level, should be regulated using the same regime.³⁵
- There is no significant effect attributable to the device that the consumer is using to find a customer service number. However, layouts of search results and websites may differ between devices, and this may contribute to consumers’ inability to identify factors that would trigger recognition of third-party websites. This means that consumers visiting websites in mobile layout (on whatever device) will have less information on which to make decisions.

³⁵ This conclusion does not necessarily mean that all services provided using 084 numbers should be regulated in the same way as premium rate services, but suggests that ICSS should be so regulated to avoid regulatory fragmentation and consumer confusion.

- The research did not examine consumers in particularly vulnerable groups. However, the research suggests that consumers who self-identify as having a low-level of technological literacy may be more likely to contact an organisation via a third party whilst believing that they are directly contacting the organisation. The vulnerability of technologically illiterate consumers could form the basis of further fruitful investigation. Other demographic attributes, including age and gender, could be examined with larger populations.

Recommendations

The following policy recommendations are suggested for consideration from the study.

1. The regulatory regime adopted by the PSA is in general appropriate. The ICSS Special Conditions provide a suitable regulatory regime for ICSS. In particular, the prohibition of imitative marketing by the ICSS Special Conditions is a useful tool in ensuring that the consumer is not misled into using call connection services when they wish to utilise direct connection.
2. It would be in the consumer interest for greater attention to be paid to ensuring essential information is prominent. Whilst the Special Conditions require information to be provided prominently, it may not be sufficient for information to appear on a webpage. Instead it should appear where a passively glancing average consumer can see it, which is normally in the top-left sextant of the page. The more important the matter that needs to be brought to the attention of the consumer, the more attention should be paid to ensuring it appears in a prominent location.
3. Disclaimers should, where possible, appear in the top-left sextant, where consumers are more likely to notice them. Disclaimers should be clearly phrased.
4. It would be beneficial to consider whether it is appropriate for all ICSS to be subject to the same regulatory regime to avoid creating consumer confusion.
5. Consumers should be given access to tools which allow them to identify call connection sites more easily. Top tips for consumers should be produced and disseminated.
6. Organisations who consumers may wish to contact should consider tools that allow consumers to connect to an official number (controlled by the organisation) using that number directly without any re-routing of calls. Top tips for these organisations should be produced and disseminated.

Top Tips for Consumers

If you are a consumer who wishes to contact an organisation, make sure that you are aware of whether you are contacting the organisation direct or via a third party, and that you know how much the call might cost. Past experience has shown that consumers can feel that they have suffered detriment if they connect with an organisation through a third party when they thought they were connecting directly. Our research suggests the following steps that you can take to ensure that you are aware whether you are engaging in direct contact or whether you are contact an organisation via a third party:

1. When searching for a number don't assume that the top search result is the direct contact for the organisation you wish to contact.
2. When assessing search results and websites, pay attention to the number and know how much you could be charged for the call.
3. When assessing search results and websites, pay attention to the url. If you wish to directly contact the company without third party intermediation does the url look like it is affiliated with the company?
4. Just because a website is well designed do not assume that it is affiliated with the organisation that you wish to contact. Although special conditions prohibitive ICSS from imitating the businesses for which they provide the numbers, websites can still look professional and slick.
5. Look for the disclaimer. If the service is provided by a third party the ICSS special conditions require that it is clearly stated if "advice or assistance... is available direct from the relevant public or commercial organisation at no or lower cost."
6. If you do wish to use an added value service provided by a call connection provider make sure that you are aware of the cost of the call. This should be clearly stated on the website.

Top Tips for Organisations that Consumers Wish to Contact

If you are a business that consumers often seek to contact, it is often the case that third parties will provide connection services to your customer service numbers. Past experience suggest that consumers who are unhappy with the call connection service (and particularly the charges levied for such a service) often complain to the business that they were trying to contact. Our research suggests the following steps that you can take to ensure that consumers are more likely to contact you directly:

1. Ensure that your customer service phone number is highly ranked on search results. Consumers are likely to contact organisations via highly ranked search results, so put in place processes to ensure that your number is a highly ranked result.
2. Ensure that your customer service number is easily accessible on your website. The findings regarding prominence apply equally to the websites of organisations – placing a number where consumers are likely to find it may prevent consumers from using third party providers.
3. Consumers who use third party numbers may be less technologically literate. Therefore, make the process for finding the customer service number as simple as possible.

Appendix A: Methodology

This provides a description of the online survey and eye-tracking studies for two tasks: 1. select a webpage and 2. extracting information from the selected webpage.

Task 1 Select a Webpage

Choose from amongst a set of search results (e.g. “You have searched for ‘ALDI contact number’ on your computer.”).

- The company name (e.g. Aldi) and device (e.g. computer) changed from question to question. The full list is provided in Appendix A.
- The prompt was followed by a screenshot of a search engine result page.
- In the online survey, the search results were numbered from 1 to 7, so that participants could indicate via a number, which was their selection.
- The position of the target result (i.e. the organisation’s own webpage) was counterbalanced across trials.
- The time it took participants to select a result and their response accuracy were recorded, both as part of the survey and as part of the eye-tracking experiment.

Goal: Our aim was to determine whether the position of the correct, first-party website, would affect the timing and accuracy of participants’ selections. That is, whether they were more likely to select third-party search results the farther down the page the correct result was.

Task 2 Judge a Webpage

After the selection task, participants saw webpages and were asked to determine their affiliation (i.e. say whether it was associated with the company given in the search term or not).

- As in Task 1, response accuracy and response time was recorded for each webpage, both as part of the survey and as part of the eye-tracking experiment.
- In the online survey, participants were asked to motivate their choices, as well as provide an indication of their confidence in their selection. Due to methodological constraints, eye-tracking participants could not be asked open-ended questions. Instead they filled out a questionnaire after the study, which asked them to list the main factors behind their judgements.

Goal: The main aims were to determine how likely participants were to perceive third-party webpages as genuine first-party pages, as well as their motivations for doing so.

Participants

Overview of the participants from the online survey and eye-tracking study.

	Online Survey	Eye-Tracking
Total Participants	47	20
Gender	25 women 21 men 1 other	15 women 5 men
Age	Average = 28.38, range 19-58	Average = 33.75, range 22-69
Education	14 GCSEs or A levels 17 undergraduate 15 postgraduate (Master's or PhD) 1 participant did not answer	1 GCSEs or A levels 12 undergraduate 7 postgraduate (Master's or PhD)
Tech-savviness 1 = not at all 9 = very	Average = 7, range 3-9	Average = 6.87, range 5-8

Appendix B: Task: Select the Search Result

The structure for this task consisted of a prompt sentence in the style of:

“You have searched for <COMPANY NAME> <SERVICE> on your <DEVICE>.”

The table lists the possible combinations of terms for both lists of experimental items. Each participant was only exposed to one list (either List 1 or 2).

ORGANISATION	LIST 1		LIST 2	
	SERVICE	DEVICE	SERVICE	DEVICE
HMRC	Customer Service	Computer	Contact Number	Phone
BT	Contact Number	Phone	Phone Number	Computer
DVLA	Phone Number	Computer	Customer Service	Phone
SKY	Customer Service	Phone	Contact Number	Computer
HSBC	Contact Number	Computer	Phone Number	Phone
Virgin	Phone Number	Phone	Customer Service	Computer
British Gas	Customer Service	Computer	Contact Number	Phone
EDF Energy	Contact Number	Phone	Phone Number	Computer
ASOS	Phone Number	Computer	Customer Service	Phone
EasyJet	Customer Service	Phone	Contact Number	Computer
Southern Electric	Contact Number	Computer	Phone Number	Phone
Severn Trent Water	Phone Number	Phone	Customer Service	Computer
Vodafone	Customer Service	Computer	Contact Number	Phone
Ryanair	Contact Number	Phone	Phone Number	Computer
O2	Phone Number	Computer	Customer Service	Phone
Thomson	Customer Service	Phone	Contact Number	Computer
EE	Contact Number	Computer	Phone Number	Phone
DWP	Phone Number	Phone	Customer Service	Computer
npower	Customer Service	Computer	Contact Number	Phone
E.ON	Contact Number	Phone	Phone Number	Computer
Scottish Power	Phone Number	Computer	Customer Service	Phone
Flybe	Customer Service	Phone	Contact Number	Computer
British Airways	Contact Number	Computer	Phone Number	Phone

Carphone Warehouse	Phone Number	Phone	Customer Service	Computer
Tesco	Customer Service	Computer	Contact Number	Phone
Asda	Contact Number	Phone	Phone Number	Computer
Sainsbury's	Phone Number	Computer	Customer Service	Phone
Morrisons	Customer Service	Phone	Contact Number	Computer
Aldi	Contact Number	Computer	Phone Number	Phone
Iceland	Phone Number	Phone	Customer Service	Computer
Lidl	Customer Service	Computer	Contact Number	Phone
Amazon	Contact Number	Phone	Phone Number	Computer
H&M	Phone Number	Computer	Customer Service	Phone
NEXT	Customer Service	Phone	Contact Number	Computer
John Lewis	Contact Number	Computer	Phone Number	Phone
Primark	Phone Number	Phone	Customer Service	Computer
M&S	Customer Service	Computer	Contact Number	Phone
Debenhams	Contact Number	Phone	Phone Number	Computer
TalkTalk	Phone Number	Computer	Customer Service	Phone
WizzAir	Customer Service	Phone	Contact Number	Computer