

EXHIBIT H

6 Regulating copycat sites

Key findings

Participants wanted copycat sites to be clearer about the services they offer. However, they struggled to come up with specific ideas for how regulation might work in practice. They did not want to prevent legitimate businesses from operating, and were also unclear whether anything could be done to address their concerns.

Some consistent suggestions were made, including clearer and better-placed disclaimers, avoiding 'official' language, and more distinctive branding for copycat sites. They also thought government websites could communicate their official status more clearly.

At the end of the qualitative interviews participants were asked for their views of copycat websites more explicitly. This included the interviewer explaining whether or not they had correctly identified official and copycat sites, and asking for their views on regulation.

6.1 Regulating copycat sites

Participants were taken aback that some of the copycat sites they had visited were so convincing, often mimicking the features of official sites (or at least what they expected from official sites). Even so, they struggled to come up with many ideas for regulating copycat sites. This was partly because they could see that going too far could prevent legitimate businesses from operating. They were also unclear who was responsible for regulation, particularly when it came to copycat site content.

As such, most participants did not think copycat sites should be banned. They could understand why different providers might be permitted for official application processes; often because they had come across sites they felt could be legitimate during their searching.

They expected that 'legitimate' copycat sites would offer additional services beyond those available through the official channels. Copycat sites that simply charged for something that should otherwise be free (or cheaper) were generally deemed unacceptable.

While there was some openness to 'legitimate' copycat sites being permitted, participants emphasised the need for greater clarity about the

services they offer. They wanted better signposting, both in search results and on the sites themselves, to make it obvious that sites are not affiliated to government and that they offer different services at an extra cost.

“It should be really clear. If it’s a legitimate business that should be fine for them.”

45-54 year old, Swansea

“I’m quite happy with the disclaimer... but it should be bigger.”

55-74 year old, Swansea

Some of the most common suggestions for regulating the content of copycat sites are outlined below.

Dos	DON'Ts
Well-placed disclaimers <ul style="list-style-type: none"> Close to top of webpage or description of the site as possible, so they are not overlooked 	‘GOV’ or ‘gov’ in URL <ul style="list-style-type: none"> References to government in URLs are an immediate risk as many see this as reassurance that they are visiting an official site
Well-formatted disclaimers <ul style="list-style-type: none"> Font size and formatting easy to read against a contrasting background 	Use the word ‘official’ <ul style="list-style-type: none"> Avoid the word ‘official’ in the name of the third party site and any information that appears in search results / sponsored ads
Distinct logos and branding <ul style="list-style-type: none"> Logos , branding and design should be significantly different from government equivalents 	Use names that confuse <ul style="list-style-type: none"> Names should not give an impression that it is a government site, even if ‘official’ language is avoided

“It’s really naughty them using GOV in the address...I wouldn’t know the difference.”

55-74 year old, London

Most participants were already aware of sponsored ads in search results, and felt that signposting was clear. Among those with less confidence there was some appetite to make the signposting even clearer, particularly at the top of search engine results. Suggestions included presenting the ads against a more obviously different-coloured background or enlarging the text that says ‘sponsored ad’. They also wanted similar rules to apply to the text in search results and URLs as suggested above, making it clear that sites were not official.

While many knew that these were ads and treated them as such (either automatically skipping them or clicking on them but aware of what they were doing), there were a few participants who treated them as if they were simply the top search results.