

Engaging with comparison websites

February 2021

Comparison websites are an important feature of the legal services market. They include websites and apps that aim to match consumers with legal issues to lawyers and law firms. Some comparison websites also compare legal service packages offered by different law firms.

While relatively new in legal services, comparison websites have already helped transform the ways people compare and choose products and services in many sectors, including in the energy and financial services markets.

In the legal service market there are indications that demand for comparison websites is rising with:

- 30% of consumers saying they shop around before choosing their legal services provider [<https://www.legalservicesconsumerpanel.org.uk/wp-content/uploads/2020/08/LSCP-2020-How-consumers-are-choosing-August-2020-1.pdf>] , and 45% that they would turn to online comparison tools [https://www.sra.org.uk/globalassets/documents/sra/research/year-one-evaluation-of-transparency-rules_research-report.pdf?version=4a91a4] to help them compare providers.

Demand for digital information and services more generally is also expected to continue growing. The Covid-19 pandemic caused the UK's internet usage to hit record levels in 2020, with Ofcom reporting that UK adults spent a quarter of their waking day online [https://www.ofcom.org.uk/__data/assets/pdf_file/0027/196407/online-nation-2020-report.pdf] . Likewise, the volume of online legal services being used also continues to grow year-on-year, up 34% in 2020. [<https://www.legalservicesconsumerpanel.org.uk/wp-content/uploads/2020/08/2020-08-05-Press-release-choosing-and-using-legal-services.pdf>]

Open all [#]

Types of comparison website

Online marketing can be expensive and time-consuming - engaging with a comparison website is a simple step you could take to build a stronger online presence while also providing information about your firm's services to prospective clients.

Different websites have different models. Some cover all areas of the economy, while others focus specifically on the legal sector.

Functionality offered by such sites can vary greatly from those that simply provide basic business listings and the opportunity for customers to post and compares reviews, through to sites that offer visitors the chance to select and directly compare detailed information about the featured businesses.

Whether your firm is featured on some sites may be not be something you have any choice over. While other sites might only include details of firms who sign up to them, sometimes offering you the option of paid-for extra facilities such as allowing you to provide quotes to prospective clients when they are searching for legal support online.

With all these models available, the chances are that regardless of the time or resource you have to spare, there is a comparison website that may potentially work for you. Offering you the opportunity and offer to build your business and to compete for new clients with other firms in an increasingly digital marketplace.

Referrals

Rules relating to referral fees do not prohibit you from engaging with comparison websites.

Even in areas where there is specific legislation on referrals, such as personal injury, engaging with comparison sites is still allowed, but subject to certain considerations.

Personal injury

From 1 April 2013, the Legal Aid, Sentencing and Punishment of Offenders Act 2021 (LASPO) prohibited the payment or receipt of referral fees in claims for damages following personal injury or death. The prohibition applies to a number of situations, including referrals between a regulated person and another person who is not a regulated person for the purposes of LASPO.

This only applies to any personal injury services specific to LASPO. This does not mean that you cannot engage with a comparison website in relation to these services.

However, if you want to provide personal injury services to clients that you are introduced to through a comparison website, you must firstly ensure that any fee arrangements or business models you adopt with that comparison website provider do not contravene section 56 of LASPO.

Many business models used by comparison tool providers do not contravene LASPO.

For example:

- you sign-up with a comparison website that requires you to pay a subscription fee to be listed on their site as a provider of personal injury services. You pay this fee regardless of whether you receive leads or clients through the website. We do not view this as a payment in breach of LASPO, as the payment is for the provision of other services – in this case, being listed on the comparison website.
- you sign-up to be listed on a comparison website that provides quotes to consumers from firms for personal injury services. You agree to pay a fee to the comparison website operator for each consumer sent a quote from your firm, regardless of whether or not this results in a consumer contacting you or becoming your client. We do not consider this amounts to a referral in breach of LASPO as you are not being provided with names and contact details that would enable you to make a direct offer (or provide relevant services) to the prospective client.

For more information, see our guidance 'The Prohibition of referral fees in LASPO 56 60' [<https://www.sra.org.uk/solicitors/guidance/prohibition-of-referral-fees-in-laspo-56-60/>] .

If you are considering signing-up to provide information about your services and your firm to a comparison website you also need to make sure that you continue to meet the requirements of regulation 5.1 of the Solicitors Code of Conduct for Solicitors, RELs and RFLs. This explains your obligations regarding referrals of clients to you by third parties. Make sure that you understand whether you need to provide information to that individual about those arrangements if they go on to become your client.

For more information, see our guidance 'Unregulated organisations giving information to clients' [<https://www.sra.org.uk/solicitors/guidance/unregulated-organisations-giving-information-clients/>] .

Advertising rules

Signing-up and providing information about your services and charges to a comparison website is allowed under our regulations. It is not a breach of paragraph 8.9 -which prohibits unsolicited approaches towards members of the public who are not your current or former clients.

Paragraph 8.8 of the SRA Code of Conduct for Solicitors, RELs and RFLs [<https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/>] sets out your regulatory obligations regarding publicity for your firm, You should make sure that any information you provide to a comparison website about your firm and / or your services is accurate and not misleading.

For more information see our guidance 'Unsolicited approaches (advertising) to members of the public' [<https://www.sra.org.uk/solicitors/guidance/unsolicited-approaches-advertising/>] ' .

Your questions answered

It is understandable that you might have questions about engaging with comparison websites if you or your firm have not done so before.

Below we discuss some of the more common issues law firms have raised with us about engaging with comparison websites:

I can't describe the quality of my services accurately on a comparison website

Information on comparison websites should help the public in making informed initial shortlisting decisions when they are shopping around online for a provider of legal services. It needs to provide enough detail for them to get a reasonable and comparable sense of your business and how it works but be short enough to digest quickly on screen.

If they like what they see, it is reasonable to expect that the public will follow a link to your own website or call you directly for a more detailed discussion. At this point they will be more engaged in investing time and energy in considering the finer detail of how you work

Different comparison websites will have different approaches to the type of information they publish, and how and when they signpost visitors to get in touch with you. If you're considering providing information to a comparison website you should ask the website operator how they approach this.

Legal service pricing is too complex/client-specific to allow for online comparison?

Comparison websites are already well established and allowing meaningful comparisons in many complicated professional service industries. This includes more commoditised sectors of law such as residential conveyancing.

Here some sites even allow law firms to provide quotes and service information in the same way that they would to prospective clients who contacted them directly. Sites featuring other legal services, such as family law advice, may require firms to provide indicative costing or general information about their charges and hourly rates. But whatever method they use, everyone on the site will follow the same rules.

The best way to work out if your pricing model will work effectively when displayed on a specific comparison website is to contact that website operator directly and find out more about their approach.

Comparison websites focus excessively on price



The potential cost of a legal service is an important factor for many people when they are shortlisting which law firm to use, perhaps the first thing they think about. But this is just as much the case offline.

Customers will always look for providers within a budget range they can afford. But to choose between these suppliers they are most likely to then consider wider factors such as a firm's credentials or any evidence as to the quality of service they provide.

That is why features such as customer reviews or firm descriptions play an ever increasingly important role on comparison websites.

For example, if your firm specialises in a particular field of law comparison websites can help you share, and via customer feedback demonstrate, how your quality and expertise stands out compared to other less specialist providers.

If you're considering signing-up to a comparison website this is worth discussing with the website provider.

Comparison websites do not provide enough leads to make engaging viable

The number of people who shop around and use comparison tools to help them choose a legal service provider is rising as internet usage continues to hit record levels.

Many sites will feature information and reviews about your business regardless of whether you engage with them or not, meaning prospective clients are forming views about your business with or without your input.

Why would you not want to engage to make sure this audience is getting as accurate and positive impression of you as possible?

Firms who choose not to engage with comparison websites may risk being left behind. Using comparison websites can work alongside other approaches you use to find new clients. It also does not impact on who you choose to take on as a client.

You can contact comparison website operators to ask them for more information about the operation of their website, what information you can add to your profile and if and how leads are generated for firms that have signed-up to them.