

Mobility aids

An OFT market study: Statement of Scope and
Invitation to Contribute

16 February 2011

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1 EXECUTIVE SUMMARY

- 1.1 The OFT has commenced a market study into mobility aids in order to examine whether the market(s) in the sector are working well for consumers and, if not, what can be done to improve how they function.¹
- 1.2 Mobility aids are products used to assist those who experience difficulty in moving around freely and independently due to an age-related, medical or other condition. They include products such as wheelchairs, scooters, stair lifts, bath aids, hoists, adjustable beds and specialist seating.
- 1.3 Mobility aids are important products for their users, who include elderly and disabled people, as they can significantly improve the quality of their lives, including their safety and well-being. For many consumers, these products are a necessity.
- 1.4 In 2008, the UK mobility aids sector was estimated to be worth approximately £500m,² and the sector is likely to expand over the coming years as the number of elderly people rises.³ A significant proportion of sales is made to the public sector.
- 1.5 A large number of complaints have been made to Consumer Direct⁴ by purchasers of mobility aids products, and key interested parties have raised concerns that the sector is not working well for consumers.
- 1.6 On 19 November 2010, the OFT announced its proposal to conduct this market study and sought views on its proposed scope.⁵ It received over

¹ Further details about the OFT's approach to market studies can be found in the OFT's publication 'Market Studies: Guidance on the OFT approach' www.of.gov.uk/shared_of/business_leaflets/enterprise_act/oft519.pdf.

² 'Equipment for the Disabled', Key Note Market Report 2009, page 14.

³ Mobility Aids & Accessories Worldwide - A Market Strategy Report, Marketstrat Inc, 2006.

⁴ Consumer Direct is the government-funded, OFT-managed telephone and online service offering information and advice on consumer issues: www.consumerdirect.gov.uk.

100 responses in which parties (including consumers, consumer organisations, other government departments, local Trading Standards Services, charities and market participants) confirmed their concerns about this sector. The OFT has taken into consideration these comments in determining the scope of this market study.

1.7 We will focus on the following issues in our market study:

- whether consumers are able to access, assess and act on the right information to enable them to purchase mobility aids that best suit their needs and means and to drive vigorous competition amongst firms
- whether consumers are being treated fairly, and if not what can best be done to address any unfairness, and
- whether competition in the wheelchair sector is working well for consumers.

1.8 In the course of our study, we will seek information from a wide range of interested parties and analyse that, together with information already received, in formulating our findings and proposed remedies.

1.9 The remainder of this document sets out:

- salient background information on the issues thus far identified by, or raised with, the OFT, including during our consultation on the proposed scope of the market study
- the scope of the market study that we have now commenced, and
- the next steps for the market study.

⁵ Please see the OFT website: www.of.gov.uk/shared_of/market-studies/Mobility-aids-scoping.pdf

2 WHAT PROMPTED THE OFT TO PROPOSE A MARKET STUDY INTO MOBILITY AIDS?

Introduction

- 2.1 Markets work well when firms compete to win business by, among other matters, achieving the lowest level of cost and prices and developing better products to meet consumers' needs more effectively than their competitors. The competitive process, when it works well, encourages businesses to innovate and provides consumers with increased choice. This can also lead to improved productivity for individual businesses and the economy as a whole.
- 2.2 Competition is also enhanced when consumers are empowered to shop around through access to readily available and accurate information about the products they are seeking and the various offers available in the market. Where consumers are able to make informed choices they are able to get a better value for money.
- 2.3 Finally, where the public sector is a major buyer in a market, its purchasing decisions can have significant effects on competition, and may have an effect on the number of suppliers, the technologies used, and the range of products available. Private sector buyers without the same level of buyer power may not be able to shape the market in the same way.⁶
- 2.4 The above considerations are all the more important where the consumers in question are vulnerable in one way or another and where the products in question are often complex and a necessity (in some cases, on an urgent timescale). In particular, where traders use methods which prevent vulnerable consumers from making informed choices, their activities can result in significant consumer detriment.

⁶ For more information, see OFT Government in Markets guide:
www.offt.gov.uk/shared_offt/business_leaflets/general/OFT1113.pdf

Preliminary research into this sector

- 2.5 The OFT's preliminary research into this sector included obtaining complaints information on mobility aids as well as other information from key interested parties.
- 2.6 When looking at consumer complaints information, we found that a large number of calls had been made to Consumer Direct by consumers who requested advice and/or raised complaints about issues with mobility aids purchases. In 2010, over 4,500 such calls were made by consumers.⁷ Callers primarily complained about the following issues: defective products, failure to observe cancellation rights, customer service, high-pressure selling and misleading advertising/claims.
- 2.7 Interested parties raised concerns that consumers are unable to make informed choices when purchasing a mobility aid: they lack information to enable them to search for better quality and prices to suit their needs and means. In particular, they highlighted that the mobility aids sector is characterised by high search costs and unequal information between buyers and sellers which can lead to poor outcomes for consumers, for example:
- over-charging, so consumers do not obtain value for money
 - 'under-treatment', whereby consumers purchase products that do not meet their needs or
 - 'over-treatment', whereby consumers purchase products that exceed their needs and therefore spend more than necessary for such products.

⁷ In 2009, nearly 5,000 such calls were made by consumers, and in 2008 this figure was over 4,000.

- 2.8 They noted further that consumers are unlikely to make informed decisions about complex issues such as the whole-life costs of operating certain mobility aids.⁸ This leads to poor outcomes for consumers, for example where they are not taking account of the potential costs of servicing or repairs when making their initial purchase decision.
- 2.9 Interested parties also raised concerns that competition in the wheelchair sector is not working as well as it should be, which leads to higher prices and less choice, and reduces businesses' incentives to provide quality improvements and innovation for consumers. In particular, they indicated that there are distortions of competition and barriers to entry/expansion in the wheelchair sector due to:
- supplier contracts with retailers containing exclusivity or terms which dampen retailers' incentives to compete on price
 - a fragmented retail market which has a limited ability to counteract suppliers' market power, and
 - public sector bodies' purchasing practices – for example, repeat selection of the same firm(s) in a series of tenders restricting choice of suppliers in the long term.

⁸ Whole-life costing would take into account both the original purchase price and ongoing maintenance and repair costs, which could be substantial.

3 SCOPE OF THE MARKET STUDY

Our initial views on the scope of the market study

- 3.1 In our Proposed Statement of Scope we proposed that the scope of this study include the following products: wheelchairs, scooters, stair lifts, bath aids, hoists, adjustable beds and specialist seating.
- 3.2 In addition, we proposed that the geographic scope of the market study be the whole of the UK.
- 3.3 We proposed that the focus of our market study include an examination of:
- whether consumers have access to the right information and whether certain matters may affect their ability to access, assess and act on information in determining whether consumers make informed choices and are also empowered to drive vigorous competition
 - whether consumers are being treated fairly, and
 - whether competition in the wheelchair sector is working well for consumers.
- 3.4 We proposed to examine these issues in the context of relevant aspects of the markets by looking at, for example, the composition of sellers and suppliers and the various channels through which mobility aids are sold/supplied to consumers.
- 3.5 We invited interested parties to comment on the proposed scope of the market study and on:
- whether there were any additional issues which should be addressed in the market study or
 - whether there were certain issues, products, or geographic areas to which the market study should give more or less attention than others.

3.6 We set out below the broad views of interested parties on these matters, which we have taken into consideration, and the resulting scope of the market study.

Resulting scope of the market study

3.7 The responses received support our initial view that the study should cover an examination of potential consumer and competition issues in this sector.

Product and geographic scope

3.8 The responses we received confirmed our proposed scope of including the UK sector for wheelchairs, scooters, stair lifts, bath aids, hoists, adjustable beds and specialist seating. We have decided to proceed on that basis.

3.9 Some other products were also suggested (for example, walking sticks), but these do not appear to share many of the issues that the above products appear to have in common. Additionally, they do not appear to raise specific issues that merit individual examination in addition to the issues that we have identified in respect of the above products. We have therefore decided not to expand the list of products to be covered.

Summary of the consumer and competition issues which we will examine and their potential harm

3.10 The market study will examine four issues. The first three are:

- whether consumers have access to the right information to enable them to make informed choices and to drive vigorous competition amongst firms
- whether consumers are able to assess and act on the information provided so as to make informed choices and to drive vigorous competition amongst firms, and

- whether consumers are treated fairly, and if not, what can best be done to address any unfairness.

3.11 Concerns that may be identified in relation to the above can lead to poor outcomes for consumers, for example:

- over-charging, so consumers do not obtain value for money
- 'under-treatment', whereby consumers purchase products that do not meet their needs
- 'over-treatment', whereby consumers purchase products that exceed their needs and therefore spend more than necessary or
- low quality products being purchased.

3.12 In addition, the fourth issue that we will examine is whether competition in the supply of wheelchairs in the UK is working well for consumers.

3.13 Concerns that may be identified under the fourth heading include distortions of competition which can dampen firms' incentives to compete to win business by, among other matters, achieving the lowest level of cost and prices and developing better products to meet consumers' needs more effectively than their competitors.

Access to the right information

3.14 Our initial view was to consider whether consumers are getting the right information to enable them to make informed choices on mobility aids that meet their needs and means. Access to the right information also enables consumers to drive vigorous competition amongst firms in order for them to provide better quality, lower prices, and more innovation.

3.15 The responses received confirmed that this issue should be included in the scope of our market study and that it affects all the products within our proposed scope.

- 3.16 We were informed that purchases of mobility aids are often infrequent. We were further informed that consumers' needs and/or the products are often complex. This means that access to good information on matters such as functionality/quality/price/whole-life costing is necessary in order for consumers to understand and assess how the products meet their needs and means.
- 3.17 However, we were informed that consumers may not have readily available access to the right information about the products they are seeking and the various offers available in the market. They noted that this may be due to a combination of factors including:
- limited information being made available upfront to consumers (be it over the internet, the telephone or at retail premises)
 - consumers being unaware that in certain cases they may need to obtain expert advice in order to ensure that they purchase a product that suits their needs
 - consumers' poor mobility, limiting their ability to access retail premises, and
 - limited access to the internet.
- 3.18 Where the right information is not readily available, the resulting high search costs for consumers make it difficult for them to shop around and make informed decisions about whether the product is suitable to their specific needs. This can lead to the poor outcomes for consumers identified in paragraph 3.11 above.
- 3.19 Interested parties noted further that consumers are unlikely to have access to information which would allow them to make informed decisions about complex issues such as the whole-life costs of operating certain mobility aids. This can also lead to poor outcomes for consumers.
- 3.20 In view of the above, we have decided to include within the scope of our market study an examination of **whether consumers have access to the**

right information to enable them to make informed choices and to drive vigorous competition amongst firms.

Ability to assess and act on information

- 3.21 Our initial view was to examine whether certain matters may affect the ability of consumers to assess and act on information provided to them so as to enable them to make informed choices and to drive vigorous competition amongst firms.
- 3.22 The responses received confirmed that this issue should be included in the scope of our market study and that it affects all the products within our proposed scope.
- 3.23 We were informed that consumers may be unable to assess and act on information available to them due to a number of factors including:
- a lack of the necessary understanding about the various offers available to them in order to make meaningful comparisons between them (often because the products are complex and differentiated)
 - having to make a purchase within a short time because of the urgency for a specific necessity product (a 'stress purchase')
 - being sold to in the home, which can make the consumer more vulnerable, thereby leading to purchasing decisions that the consumer may not otherwise have made.
- 3.24 In addition, they also noted that consumers may not be able to assess and act on information so as to work out the whole-life costs of a product, even if the relevant information were provided to them.
- 3.25 The inability to assess and act on information can lead to the poor outcomes for consumers identified in paragraph 3.11 above.
- 3.26 In view of the above, we have decided to include within the scope of our market study an examination of **whether consumers are able to assess**

and act on the information provided in order to make informed choices and to drive vigorous competition amongst firms.

Fair treatment of consumers

- 3.27 Our initial view was to consider whether consumers are treated fairly, and if not, what could best be done to address any unfairness. For these purposes, the issue of fairness covers methods of sale that are used to exploit consumers. Such methods can also affect their ability to access, assess and act on the right information.
- 3.28 The responses received confirmed that this issue should be included in the scope of our market study.
- 3.29 We were informed that in so far as the sector is characterised by high search costs and unequal information between buyers and sellers, certain traders may seek to exploit consumers' lack of information/ understanding – in some cases using misinformation. In addition, we were informed that certain traders unfairly target the elderly and vulnerable by using methods which exploit their weakness or incapacity.
- 3.30 We received responses from individual consumers, Trading Standards Services and consumer organisations which highlighted that certain traders in this sector may:
- use high-pressure sales tactics, especially when selling in the consumer's home
 - use misleading sales tactics (for example, on quality, functionality, price)
 - fail to observe cancellation rights or request consumers to waive their cancellation rights
 - fail to use terms and conditions that are sufficiently clear and fair, and provided before purchase, or

- use mass-marketing techniques, whereby personal data is sold to 'cold-call' potential consumers.

- 3.31 The above practices can lead to the poor outcomes for consumers identified in paragraph 3.11 above.
- 3.32 Traders who target consumers by using methods which exploit their weakness or incapacity, can disempower consumers from making informed choices and from driving firms to compete. Such activities can result in high levels of consumer detriment, in particular where vulnerable consumers are concerned.
- 3.33 In view of the above, we have decided to include within the scope of our market study an examination of **whether consumers are treated fairly, and if not, what can best be done to address any unfairness**. We shall also take account of the context of industry codes of practice in this sector in relation to such issues, including the OFT-approved Code of the British Healthcare Trades Association.

Whether competition in the wheelchair sector is working well for consumers

- 3.34 Our initial view was to consider whether in relation to the wheelchair sector more specifically, there are other possible sources of market problems.
- 3.35 The responses received confirmed that this issue should be included in the scope of our market study. We were informed that competition in the wheelchair sector may not be working well due to:
- distortions of competition due to the structure of the wheelchair market(s) and the number of players
 - distortions of competition due to firms' behaviour (for example, due to exclusivity or other terms in supplier contracts which restrict firms' ability to compete on price) or

- distortions of competition due to public sector bodies' behaviour as purchasers and suppliers of wheelchairs (for example, due to public sector purchasers' repeated selection of the same firm(s) in a series of tenders).

3.36 Distortions of competition can lead to the poor outcomes identified in paragraph 3.13 above. In addition, where the public sector is a major buyer in a market, its purchasing decisions can have significant effects on competition, and may have an effect on the number of suppliers, the technologies used, and the range of products available. In particular, where public sector purchasers repeatedly select the same firm(s) in a series of tenders, this can restrict the choice of suppliers in the long term.

3.37 In view of the above, we have decided to include within the scope of our market study an examination of **whether competition in the supply of wheelchairs in the UK is working well for consumers.**

Routes to the consumer

3.38 We intend to examine the consumer and competition issues raised in the preceding sections in the context of relevant aspects of the markets of the 'routes to the consumer' for mobility aids. Such aspects will include, for example, the composition of, and choice as between, sellers/suppliers (for example, specialist retailers, generalist mobility aids retailers, online retailers, doorstep traders, direct sales from suppliers, and service and repair providers), as well as the private, public and charitable sectors as channels through which sales, supplies and servicing and repairs are provided.

4 POSSIBLE OUTCOMES OF A MARKET STUDY

4.1 Market studies can lead to a range of outcomes. They may conclude that a market can be given a clean bill of health and that the initial concerns about consumer detriment are not substantiated by the information collected over the course of the study.

4.2 Where the market is found not to be working well, there are several options the OFT will consider to address the causes. These may include one or more of the following:

- improving the quality and accessibility of information for consumers (including consumer education and consumer guidance)
- making recommendations to business, for example to take voluntary action (including recommending industry codes of practice or changes to existing codes of practice)
- making recommendations to Government
- taking investigation and enforcement action against businesses suspected of breaching consumer or competition law or
- making a market investigation reference to the Competition Commission.

4.3 The above is merely an illustrative list of possible outcomes. We retain an open mind as to which outcomes, or combination of outcomes, may be appropriate to address any concerns that we may identify during the course of this market study.

5 SEEKING INFORMATION AND INVITATION TO CONTRIBUTE

5.1 We are seeking information primarily through three key channels:

- The **Invitation to Contribute** set out in the Annexe to this document. That is an open invitation to all interested parties (see 5.3 below) to comment on the issues raised in this document and provide us with supporting evidence. **The deadline for receiving responses is 5pm on Friday 4 March 2011.**
- **Information requests** being sent directly to a number of private/public/charitable organisations, seeking specific information relating to their activities in the mobility aids sector. Those organisations are also invited to respond to the Invitation to Contribute set out in the Annexe to this document.
- **Consumer research** to elicit relevant information from users/purchasers of mobility aids covered by our study.

5.2 As the market study progresses, we may choose to use other means of seeking additional information.

5.3 For these purposes, interested parties would include firms, trade bodies, individuals, consumer groups, charities in this sector, academics with an interest in this sector, other government bodies and Trading Standards Services.

5.4 Interested parties can respond to the Invitation to Contribute set out in the Annexe to this document by submitting their comments and supporting evidence by email to mobilityaids@oft.gsi.gov.uk, or writing to us at:

Mobility Aids Team
Goods Group
Office of Fair Trading
Fleetbank House
2-6 Salisbury Square
London EC4Y 8JX

5.5 It will assist us if submissions would adopt the following format and cover the following additional points:

- In relation to each section, please include a brief summary of your key points. A more detailed explanation of those points can then follow.
- Please provide, as far as possible, evidence and other relevant information to support the points that you make:
 - references to specific examples of events should be accompanied by a chronology and brief background setting the context
 - if submitting data or financial figures, please provide the date and source of the data, as well as an explanation of any definitions used
 - references to comparators should be accompanied by reasons why you consider the comparator to be appropriate
 - if you are willing to answer clarificatory questions further to your submission, please provide a named point of contact and contact details including a telephone number and email address.
- If your submission is made on behalf of a business, please provide:
 - the company name and its ultimate parent
 - a brief summary of the activities of the company, and
 - details of any other interests in mobility aids either in the UK or abroad as a supplier, business partner, or customer.

5.6 The OFT looks forward to receiving comments and working together with interested parties on this important sector.

Confidentiality/Data use statement

5.7 Please note that we may choose to refer to comments received in your submission in our published findings. In deciding whether to do so, we

will have regard to (among other considerations) the need for excluding from publication, so far as that is practicable, any information relating to the private affairs of an individual or any commercial information relating to a business which, if published, might, in our opinion, significantly harm the individual's interests or, as the case may be, the legitimate business interests of that business ('confidential information').

- 5.8 If you consider that your submission contains such information, that information should be marked 'confidential information' and an explanation given as to why you consider individual items or categories of information to be confidential. Blanket requests for confidentiality or those that are not supported by reasons will not be accepted.
- 5.9 The OFT reserves the right to disclose any information provided by you (including confidential information) for the purposes set out in sections 170⁹ and 240 to 243¹⁰ of the Enterprise Act 2002. Prior to any such disclosure, the OFT would have regard to (among other considerations) the need for excluding, so far as that is practicable, any confidential information.
- 5.10 The OFT is also subject to information disclosure duties under the Freedom of Information Act 2000 (the 'FoIA'). Where a person makes a request in accordance with the FoIA, the OFT may have to disclose whether it holds the information requested as well as the information itself (including confidential information). The FoIA contains exemptions (including one which may exempt confidential information) from the requirement to make disclosure. If you consider that any information you

⁹ Section 170 of the Enterprise Act 2002 sets out general information duties on the OFT to provide information to the Competition Commission, the Secretary of State, or the appropriate Minister in relation to the Market Investigations provisions of Part 4 of that Act.

¹⁰ Sections 240 to 243 of the Enterprise Act 2002 set out a number of permitted gateways for disclosure, including, for example, disclosure for the purpose of facilitating the exercise of a statutory function. Section 239 provides that disclosure is permitted where the requisite consent is obtained as set out in that section.

provide may be exempt from such disclosure (for example, you consider it is confidential information) you should say so and explain why.

- 5.11 Finally, to the extent that information you provide constitutes personal data under the Data Protection Act 1998, the OFT will process such data in accordance with that Act.
- 5.12 Further background information on the disclosure of information obtained during a market study is provided in the OFT's published guidance, 'Market studies' OFT 519, June 2010 in particular at paragraphs 4.23 to 4.24:
www.offt.gov.uk/shared_offt/business_leaflets/enterprise_act/oft519.pdf

6 NEXT STEPS AND CONTACTING THE OFT

Next Steps

6.1 The next steps for the study involve gathering information as explained in paragraphs 5.1 and 5.2 above and then analysing it with a view to determining whether consumer and competition issues are present in the mobility aids sector and what might be the most appropriate measures to address them. Further details on the OFT's general approach in market studies can be found in its published guidance on the OFT website.¹¹

Update on progress

6.2 The OFT is committed to working constructively and transparently with interested parties during the market study.

6.3 We will provide a public statement on our progress before mid 2011. We may also choose to make some information, or some of our evolving thinking, available on our website during the course of the study.¹² In addition, we may give further periodic updates on our website on progress and timing. Our current intention is to publish our report on the market study in September 2011.

Contacting the OFT

6.4 Anyone wishing to obtain further information on this market study should contact the Mobility Aids market study team on: mobilityaids@oft.gsi.gov.uk. The Team Leader, Maria Rican, can be contacted on maria.rican@oft.gsi.gov.uk and 020 7211 5895. The

¹¹ Please see the OFT website:

www.oft.gov.uk/shared_oft/business_leaflets/enterprise_act/oft519.pdf

¹² Please see the website page for the Mobility Aids market study:

www.oft.gov.uk/OFTwork/markets-work/current/mobility-aids/

Project Director, Louis Christofides, can be contacted on louis.christofides@oft.gsi.gov.uk and 020 7211 8935.

ANNEXE - INVITATION TO CONTRIBUTE

- A.1 In responding to this Invitation to Contribute, please refer to paragraphs 5.1 to 5.11 (and in particular the guidance in paragraph 5.5) of the main document accompanied by this Annexe.
- A.2 In particular, please provide, as far as possible, evidence and other relevant information (including dates as applicable) to support the points that you make in your response.

Access to the right information

- A.3 The OFT would welcome your comments on whether consumers have access to the right information in order to make informed choices and to drive vigorous competition amongst firms.
- A.4 In particular, please provide brief examples of situations in which consumers experienced difficulties accessing information about the product(s) being sought including related costs of servicing and repairs, for example due to:
- limited information being made available upfront to consumers on matters such as functionality/quality/price/whole-life costing (be it over the internet, the telephone or at retail premises)
 - consumers being unaware that in certain cases they might need to obtain expert advice in order to ensure that they purchase a product that suited their needs
 - poor mobility, limiting their ability to access retail premises
 - limited access to the internet or
 - any other reasons.
- A.5 In each case, please state whether the outcome for the consumer was a purchasing decision which ultimately resulted in under-treatment, over-treatment, over-charging or low quality (see paragraph 3.11 above).

- A.6 Please state what, in your view, might be a suitable remedy for any matters you identified in response to questions A.3-A.5.
- A.7 Equally, if you have examples of the sector working well and of consumers being provided with the right information to make an informed purchasing decision, we would also be keen to have brief details about them.

Ability to assess and act on information

- A.8 The OFT would welcome your comments on whether consumers are able to assess and act on the information provided to them so as to make informed choices and to drive vigorous competition amongst firms.
- A.9 In particular, please provide brief examples of situations in which consumers experienced difficulties in assessing and acting on information about the product(s) being sought including related costs of servicing and repairs, for example because:
- they lacked the necessary understanding about the various offers available to them such as to make meaningful comparisons between them (for example, because the products are complex and differentiated)
 - they needed to make a purchase within a short time because of specific urgent needs (a 'stress purchase')
 - they were sold to in the home, which can make the consumer more vulnerable, thereby leading to purchasing decisions that the consumer may not otherwise have made or
 - other factors affected them.
- A.10 In each case, please state whether the outcome for the consumer was a purchasing decision which ultimately resulted in under-treatment, over-treatment, over-charging or low quality.

- A.11 Please state what, in your view, might be a suitable remedy for any matters you identified in response to questions A.8-A.10.
- A.12 Equally, if you have examples of the sector working well and of consumers being able to assess and act on the information provided to make an informed purchasing decision, we would also be keen to have brief details about them.

Fair Treatment of Consumers

- A.13 The OFT would welcome your comments on whether consumers are being treated fairly, and if not what could be best done to address unfairness.
- A.14 In particular, please provide brief examples of situations in which consumers have been exploited by traders, for example by:
- the use of high-pressure sales tactics, especially when selling in the consumer's home
 - the use of misleading sales tactics (for example, on quality/functionality/price)
 - a failure to observe cancellation rights, including requesting consumers to waive their cancellation rights
 - a failure to use terms and conditions that are sufficiently clear and fair, and provided before purchase or
 - the use of mass-marketing techniques resulting in 'cold-calling' potential consumers.
- A.15 In each case, please state whether the outcome for the consumer was a purchasing decision which ultimately resulted in under-treatment, over-treatment, over-charging or low quality.

A.16 Equally, if you have examples in which the consumers' experience with traders was positive, we would also be keen to have brief details about them.

Competition in the wheelchair sector

A.17 The OFT would welcome your comments on the existence and extent of competition issues in the wheelchair sector.

A.18 In particular, please provide brief examples of any distortions of competition that you consider exist, for example due to:

- the structure of the wheelchair market(s) and the number of players
- firms' behaviour (for example, due to exclusivity or other terms in supplier contracts which restrict firms' ability to compete on price)
- public sector bodies' behaviour as purchasers and suppliers of these products (for example, due to public sector purchasers' repeated selection of the same firm(s) in a series of tenders) or
- other factors.

A.19 In each case, please state what you consider to be the outcome for firms and consumers.

A.20 Equally, if you have examples in which competition has worked well for firms and consumers, we would also be keen to have brief details about them.