Which?

Under the radar

A behavioural audit of deceptive design on UK airlines' websites and apps

POLICY RESEARCH PAPER NOVEMBER 2026

Which? is the UK's consumer champion, here to make life simpler, fairer and safer for everyone. Our research gets to the heart of consumer issues, our advice is impartial, and our rigorous product tests lead to expert recommendations. We're the independent consumer voice that works with politicians and lawmakers, investigates, holds businesses to account and makes change happen. As an organisation we're not for profit and all for making consumers more powerful.

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Executive summary

Online choice architecture (OCA) can significantly shape consumer decision-making in digital environments. When used manipulatively, it can distort choice, undermine competition, and lead to consumer harm. The commercial aviation sector is particularly susceptible to these risks due to the complexity of booking flights and the relatively high value of tickets, and is currently undergoing reform.

To understand how these practices manifest, Which? conducted a two-part empirical investigation combining a behavioural audit of six popular UK airlines and a nationally representative survey of consumers with recent flight booking experience.

The research revealed that potentially manipulative OCA is highly prevalent across airlines' websites and apps, with an average of 10 OCA instances occurring in a typical eight-stage booking journey. These design choices are widespread and can create significant barriers to informed consumer choice. When taken in the round, these practices are viewed negatively by just under two in three consumers, with just under four in ten feeling the designs are explicitly manipulative to encourage additional spending.

We identified six OCA practices that are pervasive in airline ticket booking journeys:

- Bundling - found in 92% of audited journeys
- Framing and sensory manipulation - 88%
- Sludge - 71%
- Scarcity claims - 67%
- Reference pricing - 63%
- Forced outcomes - 58%

We illustrate how these practices typically appear in airline booking journeys and discuss how they may lead to consumer harm. Crucially, we present improved alternative designs for each practice to show that purchasing journeys can be structured to support transparency and informed decision-making without resorting to manipulative architecture.

We present three recommendations:

1. The government should use the opportunity presented by the Civil Aviation Bill to consider further proposals to prohibit specific online choice architecture practices in the aviation sector.
2. The Civil Aviation Authority should act to raise industry standards by challenging manipulative online choice architecture and supporting airlines to design better and fairer online customer journeys.
3. To better understand the cumulative impact of manipulative OCA, the government should collaborate with sectoral regulators to investigate further.

1. Introduction

Every day, millions of UK consumers make important financial decisions online, guided through digital environments that are deliberately designed to influence their actions and choices. The design, structure, and framing of these environments - collectively known as online choice architecture (OCA) - shape not only what information consumers see, but when they see it, how it is presented, and how easily they can evaluate alternative options.

When designed with fairness and transparency in mind, OCA helps consumers navigate complex options efficiently. However, it can also be used malignly to deceive or manipulate consumers. This distorts consumer choice, harms market competition, and causes financial, time and psychological consumer detriment.[1]

In the UK, OCA has been subject to growing scrutiny. The Digital Markets, Competition and Consumers Act 2024 equipped the Competition and Markets Authority (CMA) with direct enforcement and tough fining powers. The CMA has used these powers to tackle certain egregious examples of OCA proscribed by the Act as banned practices in Schedule 20 of the Act, such as drip pricing and fake reviews,[2] although it has less ability to tackle manipulative OCA that is not listed as a banned practice.[3]

Momentum is also growing in Europe where the Commission has recently published its proposals for a Digital Fairness Act which specifically outlaws 10 'dark patterns' and includes a general prohibition against traders 'design[ing], organis[ing] or operat[ing] their online interfaces … in a manner that is likely to deceive or manipulate consumers.'[4]

Commercial aviation stands out as a sector with significant potential for consumer harm stemming from the use of manipulative OCA. Booking a flight can be a complex and often confusing transaction process. There is a vast selection of destinations, carriers, and flight times to compare, contrast and reconcile with other travel plans. The headline prices for each flight do not necessarily include the same things, such as luggage or seat reservations, making comparison even more difficult. Almost all airlines then offer add-ons or extras, where it's not always clear whether they add value or not. UK households spend over £14 billion a year on domestic and international flights, so the potential for harm is significant when consumers are faced with complex choices.

The UK aviation sector is also currently going through reform, driven by the Civil Aviation (Consumer Protection and Regulatory Reform) Bill currently progressing through parliament. The Bill is expected to equip the Civil Aviation Authority (CAA) with direct, CMA-style enforcement powers while also enabling the CAA to introduce new passenger rights rules, including in relation to pricing practices and pricing transparency.[5] The government's recent

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[1] CMA (2022) *Online Choice Architecture: How digital design can harm competition and consumers*.
[2] CMA (2026) *Direct consumer enforcement: 18 months on*
[3] McDonald and Concha (2024) *Designing regulations to combat online manipulation: a UK perspective*.
[4] European Commission (2026) *Digital Fairness Act*.
[5] UK Parliament (2026) *Civil Aviation (Consumer Protection and Regulatory Reform) Bill*.

announcement to scrap extra charges when flying is expected to be implemented via consultation once the Bill is passed.[6]

Given the increased scrutiny of manipulative OCA in the UK and Europe, the heightened risk of consumer harm stemming from OCA in the commercial aviation sector, and the opportunity for change presented by the Civil Aviation (Consumer Protection and Regulatory Reform) Bill, Which? set out to investigate the use of manipulative OCA in airline ticket purchasing journeys and consumers' attitudes and opinions towards it.

To do this, Which? conducted a comprehensive, two-part empirical investigation consisting of an in-depth behavioural audit of 24 consumer journeys across 6 airlines, and a representative consumer survey of over 2,000 UK adults. The methodology and findings of the empirical research are set out in section 2.

This is complemented by a series of case studies in section 3 which consider the most prevalent practices in greater detail, setting out their potential pathways to harm and illustrating how consumer journeys can be designed without the use of manipulative OCA. Our reflections on the research findings and our subsequent recommendations for the Department for Transport, the CAA, and the wider regulatory community are presented in section 4.

[6] Department for Transport (2026) *Take off for passengers as government scraps extra charges when flying*.

2. Research

2.1 Behavioural audit

Method

Which? commissioned The Behaviouralist, a behavioural science consultancy, to conduct a behavioural audit of airline websites and mobile apps. The audit was designed to identify pricing and OCA practices that may influence consumer decision-making or create barriers to consumers making informed choices.

A behavioural audit involves systematically mapping online design practices and evaluating their potential impact on user behaviour and outcomes. Data collection was guided by a structured framework informed by established evidence on OCA, drawing primarily from the CMA's *Evidence review on Online Choice Architecture and consumer and competition harm*.[7]

Six airlines were selected to provide coverage of popular airlines operating in the UK, while capturing variation in customer satisfaction and airline type. The selection was informed by Which?'s airline performance research conducted between October and November 2025, which surveyed 5,518 consumers who had taken an economy flight from a UK airport since October 2024.[8]

The selected airlines were among those most frequently used by survey participants. The sample also included variation in customer scores, with three airlines among the lower-rated providers, scoring between 55% and 67%, and three among the higher-rated providers, scoring between 72% and 79%. Two of the higher-rated airlines were Which? Recommended Providers, including one short-haul airline and one long-haul airline.

For each airline, researchers completed four customer journeys from initial flight search through to checkout. The journeys were designed to capture variation across key booking characteristics, including platform type, route length, baggage requirements, departure location and whether the journey involved travelling with a child to test how family seating was presented.

Results

The audit identified many examples of manipulative OCA across the 24 online booking journeys. Table 1 lists the practices identified, their descriptions as defined by the CMA, an example of the practice, as well as the proportion of journeys the practices were seen on.[9]

The audit also identified that OCA practices rarely appear in isolation. On average, across a typical eight-stage journey, we identified 10 instances of OCA in use. Those 10 instances were not always single practices, but often involved multiple different practices being used together. Framing & sensory manipulation tactics, in particular, were often used to reinforce other practices.

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[7] CMA (2022) *Evidence review of Online Choice Architecture and consumer and competition harm*.
[8] Which? (2026) *Best Airlines for 2026*.
[9] CMA (2022) *Evidence review of Online Choice Architecture and consumer and competition harm*.

Table 1: Online choice architecture practices identified in the behavioural audit

OCA Practice	Description	Example in airline journeys	Prevalence
Bundling	'The choice architect groups two or more products and/or services in a single 'package' at a special price.'	An airline may offer a variety of fares for the same flight which include different add-ons under a single price.	92%
Framing & sensory manipulation	'The choice architect decides how any decision-related information is described or presented to a consumer.' 'The choice architect employs visual, aural, and tactile features to steer consumers towards certain options.'	When offering travel insurance as an add-on, it may be used to accentuate the risks of traveling that can be mitigated with insurance. It is also commonly used in combination with other practices to reinforce them.	88%
Sludge	'The choice architect creates excessive or unjustified friction that makes it difficult for consumers to get what they want or to do as they wish.'	After selecting the cheapest fare, an airline may use multiple pop-ups to prompt you to reconsider a more expensive option.	71%
Scarcity and popularity claims	'The choice architect informs consumers about limited stock, limited time to buy, or high popularity of an item.'	Flights may be labelled as 'most popular', or include information such as 'only 2 seats left at this price'.	67%
Reference pricing	'The choice architect displays a previous (or future) price with the current price, which makes the current price look more attractive.'	An airline may display a crossed-out 'was' price alongside the current, cheaper price.	63%
Forced outcomes	'The choice architect changes the outcome without giving consumers a choice.'	In order to complete a purchase, an airline may force customers to log-in or sign-up for an online account.	58%
Prompts and reminders	'The choice architect contacts the consumer to induce an action and/or follow up on a previous interaction.'	When choosing a small bag only, the user may be prompted with the possible penalty if their bag is too big.	29%
Defaults	'The choice architect applies a predefined setting that the consumer must take active steps to change.'	When selecting a seat, the most expensive row may be selected by default.	21%
Dark nudges	'The choice architect makes it easy or removes friction for consumers to make inadvertent or ill-considered decisions.'	An airline may choose not to clearly indicate its policy to seat travel companions together, and instead encourage purchasing seats to guarantee this.	13%
Drip pricing	'The choice architect initially shows only part of the price and reveals the full price of the product or service at later stages of the consumer journey.'	An airline may require travellers to pay for a seat when travelling with children, but this is not included in the headline price.	8%

While the audit demonstrates how widespread these tactics are across airline booking journeys, it is important to distinguish between prevalence and legality. With the exception of drip pricing - which is strictly prohibited under UK consumer law[10] - we do not believe that any of the practices observed in our audit are currently illegal. Airlines are permitted to use techniques such as bundling, framing, and scarcity claims when designing their websites and apps.

However, the fact that a design practice is lawful does not mean it is benign. Even where they sit within existing legal boundaries, these tactics may obscure key information, create unnecessary friction, and steer passengers toward poor-value choices. To understand how flyers experience these permitted practices and where they become problematic, we therefore investigated further through nationally representative consumer research and detailed case studies.

2.2 Consumer research

Method

Yonder, on behalf of Which?, conducted an online nationally representative survey with 2,079 UK adults between 17th to 19th July 2026. In order to understand the views of people who have direct experience of the booking processes in question, we screened out anyone who had not booked at least one flight directly with an airline in the last 12 months. This resulted in 759 UK adults who completed the rest of the survey.

The survey explored the attitudes and opinions of common online design practices. To do this, we created stylised examples of the six most common practices, as identified in the behavioural audit.[11] We asked participants for their views on each of the practices individually, as well as their views on the practices when taken as a whole, as commonly experienced on airlines' booking journeys.

Results

Consumers expressed a wide variety of opinions when asked about the six most common OCA practices observed in our audit. Many considered the practices to be manipulative or annoying, whilst others thought they were helpful or convenient.

Figure 1 illustrates the spectrum of opinions on each individual practice by showing a net score for positive and negative answer codes, as well as the proportion of people who said they weren't bothered by the practice.

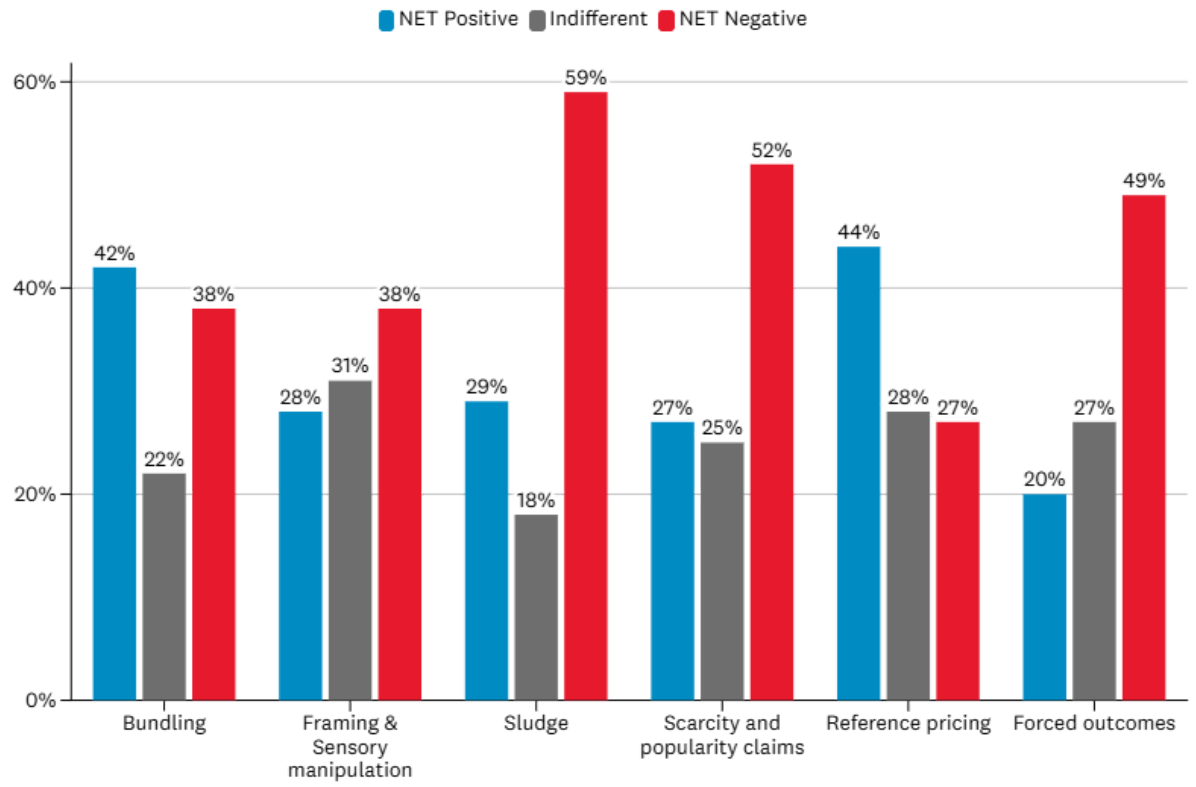
For many of the practices, there was a fairly balanced split of opinions. For example, bundling had a net positive score of 42%, but a net negative of 38%.

In contrast, sludge, scarcity and popularity claims, and forced outcomes all saw more one-sided responses.

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[10] The examples classified as drip pricing in our audit are under investigation by the CMA, as announced in June 2026.
[11] The stylised examples, as shown to the research participants, are included as 'typical designs' in the case studies below.

Figure 1: Net consumer sentiment toward specific OCA practices

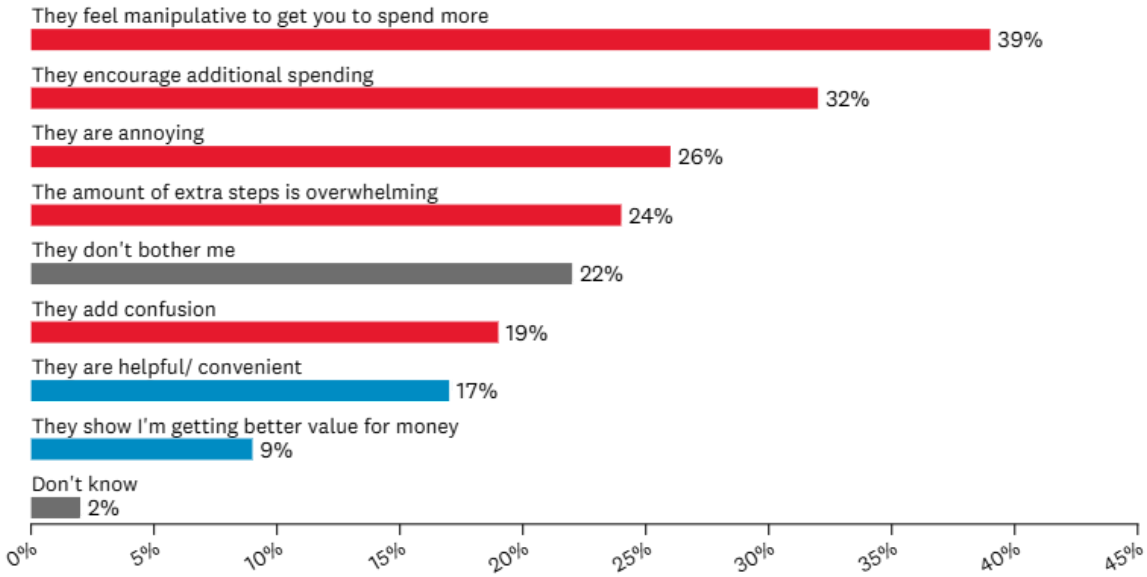


Source: Which, if any, of the following describes what you think about [description of OCA practice] when booking flights? Base: 759 UK adults who booked a flight on an airline's website or app in the last year. Bars may sum to more than 100% as participants could select both positive and negative answer codes given the variety of the practices.

When we asked people about how they felt about the accumulation of OCA practices, the results were much clearer. Over six in ten people, 63%, selected at least one negative statement about the cumulative impact of OCA practices throughout the airlines' journeys.

The most popular statement about the practices, selected by almost four in ten people (39%), was that the practices 'feel manipulative to get you to spend more'. This was followed by 32% selecting that the practices 'encourage additional spending'. Opinions towards the practices were not completely negative though. 21% of people selected positive statements about the cumulative impact, while 22% said they didn't bother them. Figure 2 shows the full set of statements selected.

Figure 2: Consumer sentiment toward the accumulation of OCA practices



Source: Thinking about all the examples you have just seen. Which, if any, of the following describe your overall opinion of these practices when booking flights? Base: 759 UK adults who booked a flight on an airline's website or app in the last year.

3. OCA case studies

In order to better understand the OCA practices used by airlines, we present case studies of the six most pervasive practices identified by our audit. By isolating the specific practices, we illustrate exactly how airlines manipulate digital environments to steer consumer behaviour, often at the expense of transparency and informed decision-making.

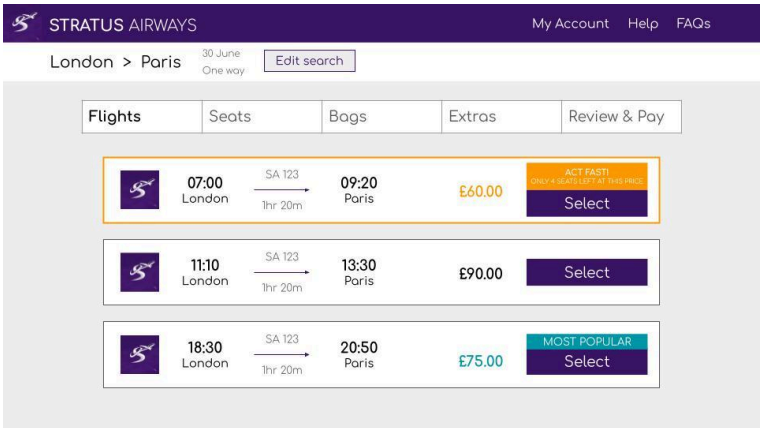
Each case study follows a typical consumer journey and is presented according to a consistent, structured framework:

- **OCA practice and definition**
  We identify the specific OCA practice using established terminology and definitions from the Competition and Markets Authority (CMA).[12]
- **The typical design**
  Inspired by real examples from our audit, we provide an annotated visual example demonstrating how the OCA practice is often applied in real-world booking journeys to the potential detriment of the customer.
- **Consumer perspective**
  Quantitative insights drawn from our nationally representative survey show consumers' perspectives towards the practice. We display the four most common responses to each practice, as well as the proportion of people who selected any negative or positive statement.
- **Route to harm**
  Whilst the audit and consumer research do not provide direct evidence of consumer harm, we discuss how the practice could potentially lead to consumer harm, drawing on academic theory and research. For a more detailed review of the academic literature behind each practice, see the CMA's *Evidence review on Online Choice Architecture and consumer and competition harm*.[13]
- **The improved design**
  Finally, we present an alternative design to show how the consumer journey could, and should, be designed in order to support informed consumer choice.

[12] CMA (2022) *Evidence review of Online Choice Architecture and consumer and competition harm*.
[13] *Ibid.*

3.1 Scarcity and popularity claims

'The choice architect informs consumers about limited stock, limited time to buy, or high popularity of an item.'



Typical design

Two of the three flights include visually-striking labels to signal their scarcity or popularity.

The first includes a label encouraging the consumer to "act fast!" as "only 4 tickets are left at this price" whilst the third includes a "most popular" label.

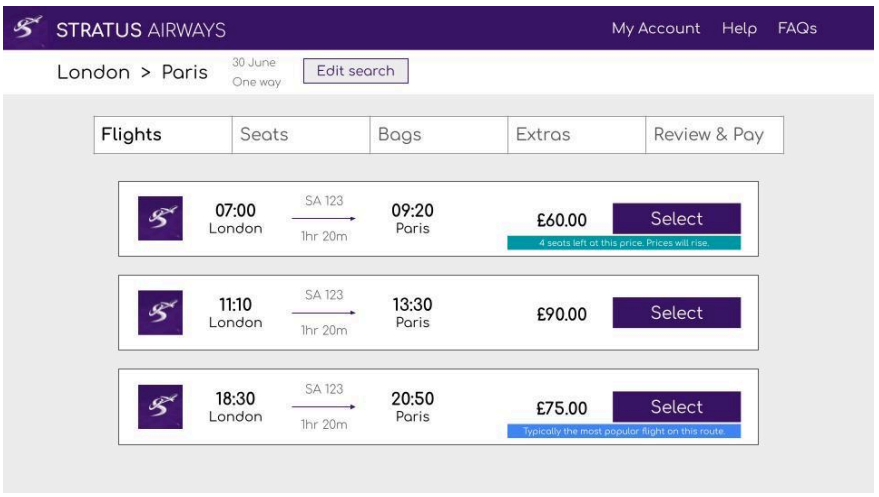
Consumer attitudes towards scarcity and popularity claims:		
Top responses	• Manipulative (26%) • Feared missing out (24%)	• Indifferent (25%) • Felt rushed (23%)
Overall sentiment	Positive: 27% Negative: 52%	

Scarcity and popularity claims are commonly used on digital platforms to encourage sales by placing pressure on consumers.[14] For plane tickets, where there are a finite number of seats, legitimate and responsibly-presented claims may be material information and help consumers make good choices.

However, for the claims to be helpful, rather than just exerting pressure, more information is typically needed than we typically found in the audit. Many of the examples were vague and did not explain what would happen to prices if consumers missed out on the one currently advertised. This can cause consumers to make rushed and suboptimal decisions.

Improved design

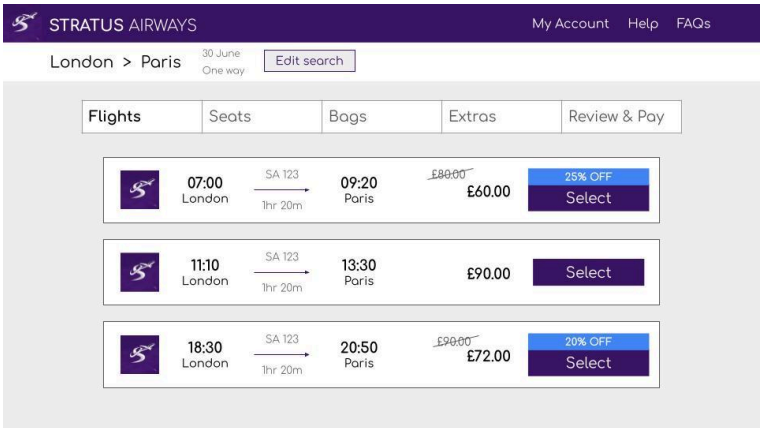
Airlines could include the necessary information to make the claims helpful, and present them less forcefully. Consumers could then make informed decisions based on availability and their circumstances.



[14] Teubner & Graul (2020) *Only one room left! How scarcity cues affect booking intentions on hospitality platforms*.

3.2 Reference pricing

'The choice architect displays a previous (or future) price with the current price, which makes the current price look more attractive.'



Typical design

Crossed-out prices and a '20/25% off' label are included to signal a price reduction.

It isn't made clear to customers what the crossed-out prices relate to, and so it is unknown if the price reduction represents a genuine deal or not.

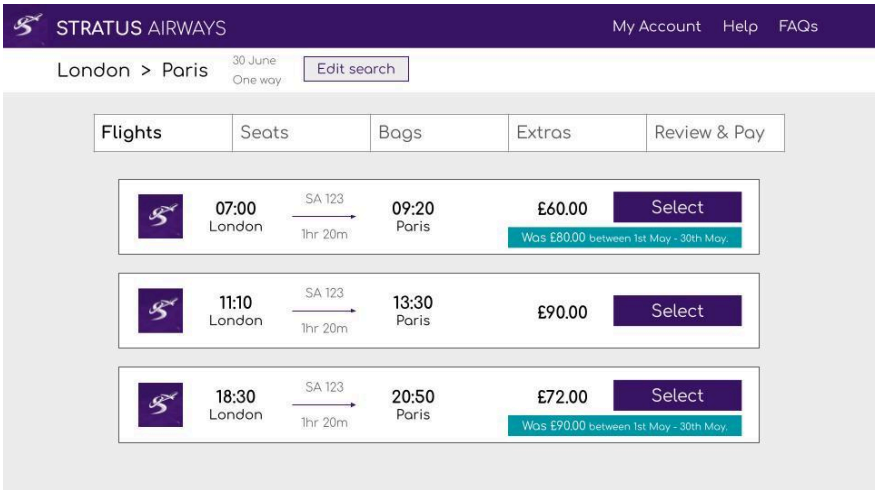
Consumer attitudes towards reference pricing:		
Top responses	• Indifferent (28%) • Reassuring (21%)	• Helpful (27%) • Manipulative (17%)
Overall sentiment	Positive: 44% Negative: 27%	

It is well established that reference prices can change consumer behaviour. When truthful and presented fairly, they can helpfully guide consumers to a good deal, but they can also raise consumer valuations of the offer, and lower efforts to search for better deals.[15]

When presented with inaccurate, false or insufficient contextual information, they can mislead consumers into believing they're getting a good deal, and can undermine effective competition by hindering proper comparison of options.

Improved design

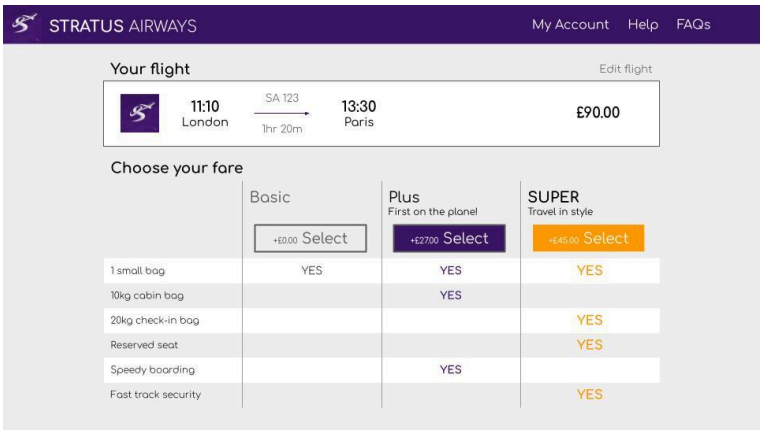
Our version shows that it's still possible to offer legitimate discounts and good deals without taking advantage of consumers. Airlines offering genuine discounts are able to do so on a level playing field.



[15] Ahmetoglu et al. (2014) *Pricing practices: A critical review of their effects on consumer perceptions and behaviour*.

3.3 Bundling

'The choice architect groups two or more products and/or services in a single 'package' at a special price.'



Typical design

A hierarchy of bundles, including different combinations of add-ons. These add-ons can be added individually later in the journey, but this isn't made clear.

Bundles commonly use framing & sensory manipulation to steer consumers away from the cheapest option.

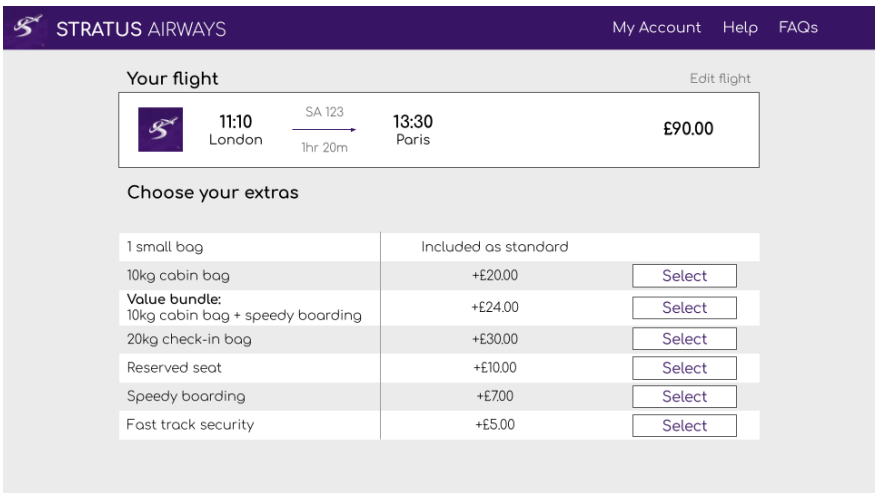
Consumer attitudes towards bundling:		
Top responses	• Helpful (26%) • Manipulative (21%)	• Indifferent (22%) • Convenient (19%)
Overall sentiment	Positive: 42% Negative: 38%	

Every airline we looked at offered bundles to its customers. They used it to combine various add-ons into simpler packages, often combined with framing & sensory manipulation techniques to make the more expensive bundles as attractive as possible.

Bundling impacts consumer decision-making in two key ways.[16] It can affect consumers' preference formation and how consumers compare choices. Bundling also has the potential to cause harm by causing confusion around the true value of bundles and their constituent parts, leading to misaligned outcomes. This is particularly likely when the price of individual components of a bundle are not presented at the same time as the bundle price.

Improved design

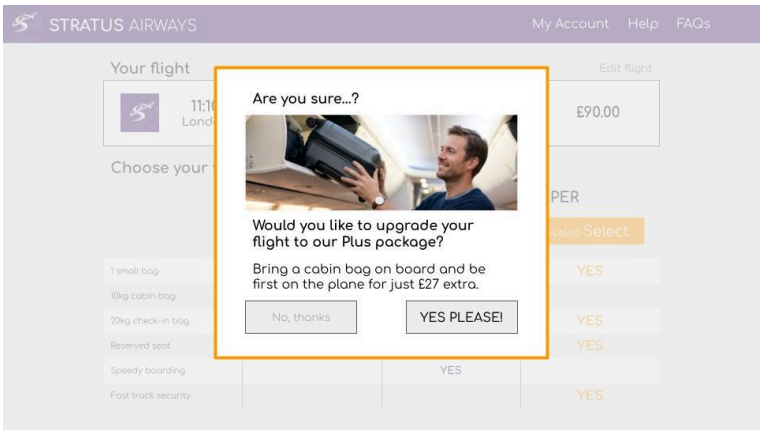
Add-ons could be displayed as a menu, helping consumers evaluate their options with full and clear information available to them. It's still possible to offer combinations of add-ons in this design.



[16] Rao et al. (2018) *Emerging Trends in Product Bundling: Investigating Consumer Choice and Firm Behavior*.

3.4 Sludge

'The choice architect creates excessive or unjustified friction that makes it difficult for consumers to get what they want or to do as they wish.'



Typical design

An obtrusive pop-up interrupts the consumer journey to encourage the consumer to reconsider the choice they've made.

It only appears when the consumer selects the cheapest option, suggesting it's not intended as a helpful chance to correct any mistakes, but just an opportunity to upsell.

Consumer attitudes towards sludge:		
Top responses	• Annoying (38%) • Makes process longer (23%)	• Manipulative (30%) • Indifferent (18%)
Overall sentiment	Positive: 29% Negative: 59%	

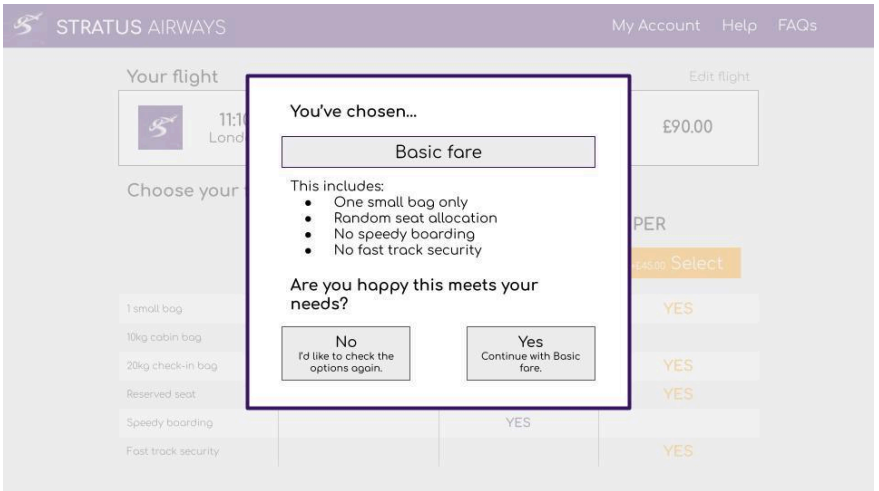
Sludge makes it harder for people to do what they want to do.[17] It can cause consumers to experience unnecessary economic costs which bring them no value and are not required to complete the transaction. It was by far the least popular practice among consumers.

In the airline industry, sludge is commonly used to prompt consumers to reconsider a choice that they've made - predominantly encouraging them to 'upgrade' their choice to a more expensive option. Not only does this practice add unnecessary time and effort to the transaction, but consumers may end up paying more for something they do not truly value.

Improved design

If it's truly necessary to prompt customers to review their selections, then it could be done in a more neutral and supportive way.

Our design reminds customers what they've selected and prompts them to double check it's right for them.



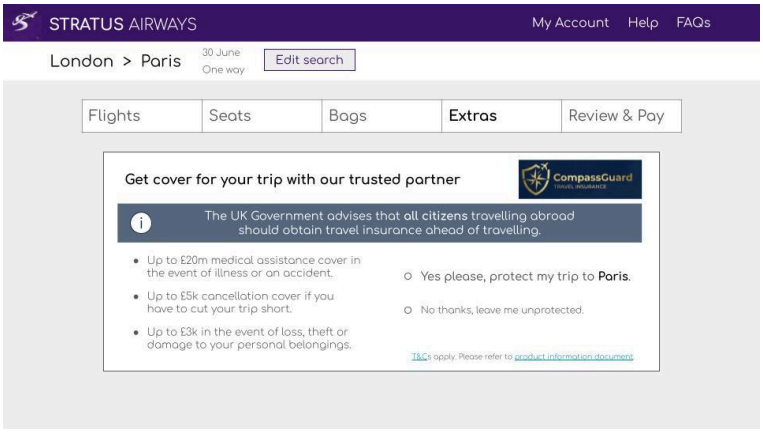
[17] Shahab & Lades (2021) *Sludge and transaction costs*.

Picking a flight | **Choosing add-ons** | Check-out

3.5 Framing & sensory manipulation

'The choice architect decides how any decision-related information is described or presented to a consumer.'

'The choice architect employs visual, aural, and tactile features to steer consumers towards certain options.'



Typical design

In this example, the airline uses framing & sensory manipulation in an attempt to sell an insurance add-on. It uses multiple techniques (e.g. personalisation and confirmshaming) to persuade customers.[18]

Framing & sensory manipulation is used frequently in combination with other practices.

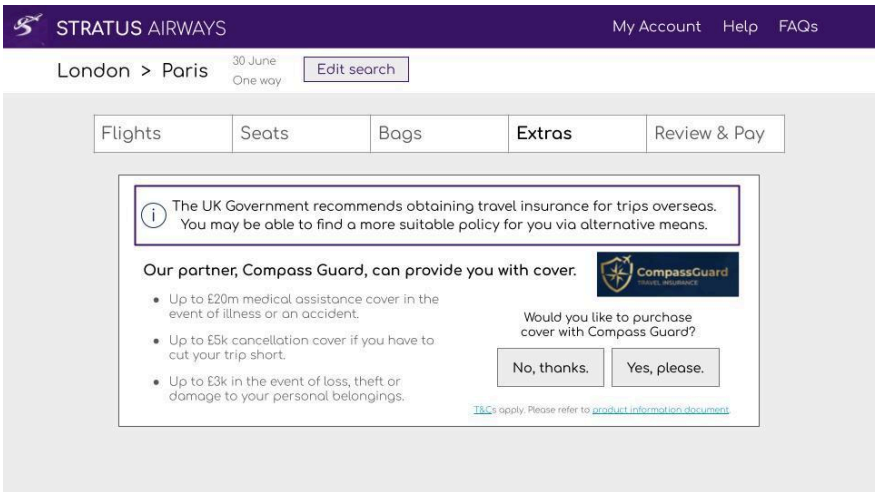
Consumer attitudes towards framing & sensory manipulation:		
Top responses	• Indifferent (31%) • Annoying (22%)	• Manipulative (22%) • Helpful (21%)
Overall sentiment	Positive: 28% Negative: 38%	

Consumer choice can be impacted by both the literal presentation of information and choices on a website or app, as well as the relative framing of them. These techniques can make it more difficult for consumers to act in line with their actual preferences.[19]

If consumers cannot freely choose the options that suit them, they risk overpaying or purchasing unnecessary items. Ultimately, this can undermine effective competition in the market.

Improved design

Our version focuses on presenting information in a neutral way, enabling consumers to make decisions that align with their own preferences.

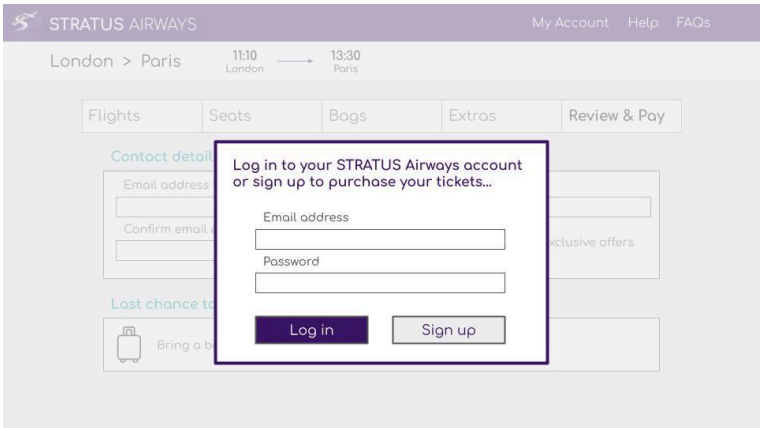


[18] See Which? (2026) *Dark Patterns 2026* for a fuller explanation of these techniques.
[19] Luguri & Strahilevitz (2021) *Shining a Light on Dark Patterns*.

Picking a flight | Choosing add-ons | **Check-out**

3.6 Forced outcomes

'The choice architect changes the outcome without giving consumers a choice.'



Typical design

In order to complete the purchase, consumers are forced into logging in or signing up to an online account - there is no option to continue without doing so.

Our audit also identified the compulsory acceptance of T&Cs when searching for flights.

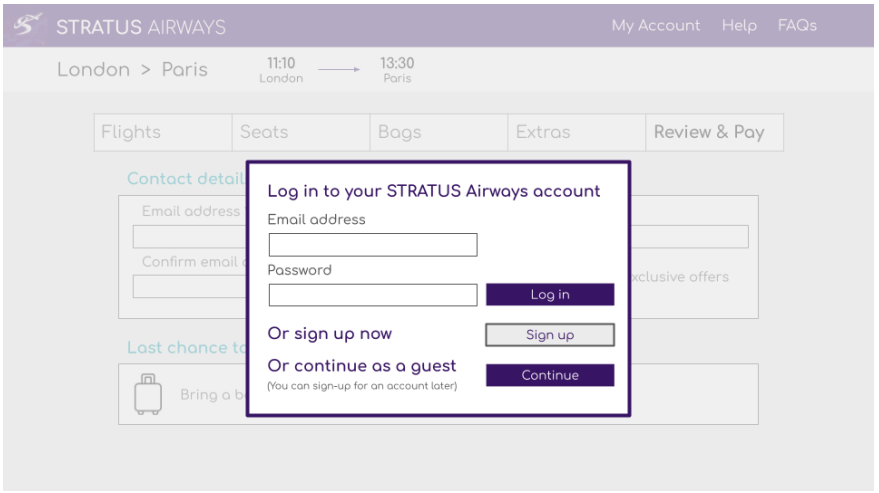
Consumer attitudes towards forced outcomes:		
Top responses	• Annoying (40%) • Manipulative (18%)	• Indifferent (27%) • Feels wrong (16%)
Overall sentiment	Positive: 20% Negative: 49%	

For markets to work well, consumers must be able to make choices freely. This applies not only to the products and services they purchase, but also to the way businesses collect and handle personal information.

Forcing customers to accept T&Cs just to search for a flight, or forcing them to log in or sign up in order to make a purchase is unnecessary. In the latter case, it means airlines are able to collect information on potential passengers even without them completing a purchase. The airline may be able to use this information to its benefit, giving airlines that force customers to share data a potential advantage over those that don't.

Improved design

To complete a purchase, our design provides the option to log in or sign up, or offers an alternative route to check out for those who would ordinarily prefer not to.



4. Discussion

Commercial aviation is a high-value, complex market in which UK households spend over £14 billion each year. Since headline flight prices rarely include the same elements - such as cabin baggage or seat reservations - comparing fares across airlines is already difficult for passengers. Our two-part empirical investigation demonstrates that widespread manipulative online choice architecture (OCA) compounds this complexity, creating significant barriers to transparent, informed consumer choice.

Our behavioural audit of six UK airlines found that potentially manipulative design is embedded throughout the standard booking process, with an average of 10 OCA instances appearing across a typical eight-stage journey. Tactics such as bundling, framing and sensory manipulation, and sludge occur routinely, alongside scarcity claims, reference pricing, and forced outcomes. Crucially, while our survey shows that consumers hold mixed views on some of these practices when assessed in isolation, sentiment shifts markedly when considered cumulatively. Over six in ten flyers (63%) view the cumulative use of OCA negatively, and nearly four in ten (39%) feel these designs are explicitly manipulative to encourage additional spending.

Further, as the improved designs in section 4 demonstrate, add-ons, genuine discounts, and account registration can all be presented neutrally in ways that support, rather than distort, consumer decision-making.

Taken together, these findings point to a strong case for intervention, and now is a timely opportunity to act. As the Civil Aviation (Consumer Protection and Regulatory Reform) Bill progresses through parliament - and alongside the government's recent proposals to scrap unfair extra charges when flying - policymakers have a clear legislative window to raise standards across the sector.

However, our research also highlights an important gap in the existing evidence base. While academic literature and regulatory reviews examine individual OCA practices in detail, empirical evidence on how layered practices interact and compound consumer harm across a single transaction remains sparse.

4.1 Recommendations

To address the risks identified in our research and ensure online flight booking journeys support fair, informed consumer choice, we make three recommendations.

1. Tackling manipulative design through upcoming legislation and policy

The Civil Aviation (Consumer Protection and Regulatory Reform) Bill presents the government with an opportunity to enact real positive changes for consumers in the aviation sector. We expect the government to use the consultation process set out in the Bill to eliminate unfair and unnecessary charges.

Given the financial outlay and complexity involved in booking flights, tackling a handful of extra charges alone will not fully protect consumers if manipulative choice architecture

continues to steer them toward poor-value extras and hinder effective competition. It should use this opportunity to go further, and consider prohibiting the use of specific online choice architecture practices in the aviation sector.

For example, it should consider prohibiting the use of sludge which is commonly used by airlines to prompt consumers to reconsider their choices, often encouraging them to purchase a more expensive option when they've already made their decision.[20] Or it may consider prohibiting the use of forced outcomes where it is not strictly necessary, so consumers may choose whether to share their personal information or not.

The government should use the opportunity presented by the Civil Aviation Bill to consider further proposals to prohibit specific online choice architecture practices in the aviation sector.

2. Raising industry standards by helping airlines to design fair and supportive online customer journeys

Some online choice architecture practices are not inherently bad and can instead be used to support consumer decision making. In these cases, it may be inappropriate to prohibit them, and instead be more proportionate to support airlines to design fair and supportive, online customer journeys.

The Civil Aviation Authority (CAA) is well positioned to provide this leadership to the sector. It should challenge manipulative OCA practices and clearly set out where their use may undermine effective consumer choice.

Ultimately, the CAA is best placed to determine how to improve standards in the sector, however we would expect a combination of formal or informal regulatory supervision and cross-sector education and support would likely be effective.

The Civil Aviation Authority should act to raise industry standards by challenging manipulative online choice architecture and supporting airlines to design better and fairer online customer journeys.

3. Building the evidence base on cumulative OCA harm

A central finding of this research is that manipulative online design practices rarely appear in isolation. Instead, airlines routinely combine multiple tactics - such as reinforcing bundling or scarcity claims with framing and sensory manipulation - across a single journey. Although substantial research examines the effects of individual OCA practices, evidence on how

[20] Paragraph 58 in the EU Commission's Annex to the Proposal for a Digital Fairness Act may provide a template for how this would be practically enacted.

these tactics work in combination and cumulatively is limited. Because layered practices are likely to reinforce one another and amplify their impact on consumer behaviour, further investigation is vital to inform effective regulation across digital markets. The government is well placed to lead this research programme, drawing on the behavioural and market expertise held within sectoral regulators.

To better understand the cumulative impact of manipulative OCA, the government should collaborate with sectoral regulators to investigate further.

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