



## MRS Policy Unit

### Submission to House of Lords Select Committee on Artificial Intelligence

#### **Background: About the Market Research Society (MRS) and the research market**

1. The Market Research Society (MRS) is the world's largest research association. It's for everyone with professional equity in market, social and opinion research and in business intelligence, market analysis, customer insight and consultancy. MRS has 5,000 members in over 50 countries and has a diverse membership of individual researchers within agencies, independent consultancies, client-side organisations, the public sector and the academic community.
2. MRS also represents over 500 research service suppliers including large businesses and SMEs plus a range of research teams within large brands such as Tesco, BT, ITV, Telefonica and Unilever which are accredited as MRS Company Partners.
3. MRS promotes, develops, supports and regulates standards and innovation across market, opinion and social research and data analytics. MRS regulates research ethics and standards via its Code of Conduct. All individual members and Company Partners agree to regulatory compliance via the MRS Code of Conduct and its associated disciplinary and complaint mechanisms.
4. The UK is the second largest research market in the world, second to the US, and in terms of research spend per head of population is the largest sector with £61 per capita in 2015 (with the US at £39, Germany £24 and France £23)<sup>1</sup>. The UK research supply industry is a £4bn market and has grown steadily over the previous five years by an average of 6% per year<sup>2</sup>. In 2016, MRS with PWC undertook an updated assessment of the size and impact of the UK research and evidence market, *The Business of Evidence 2016*<sup>3</sup>. One of the main findings from this report is the size of the UK 'business of evidence' market, which employs up to 73,000 people and generates £4.8 billion in annual gross value added (GVA). Data analytics exhibits the highest growth rate at over 350% growth since 2012.

---

<sup>1</sup> See the Research-Live Industry Report 2017:  
[http://www.mrs.org.uk/pdf/MRS\\_RESEARCH%20LIVE%20REPORT%202017%20.pdf](http://www.mrs.org.uk/pdf/MRS_RESEARCH%20LIVE%20REPORT%202017%20.pdf)

<sup>2</sup> See ONS Annual Business Survey:  
<https://www.ons.gov.uk/businessindustryandtrade/business/businessservices/bulletins/uknonfinancialbusinesseconomy/2015revisedresults>

<sup>3</sup> See Summary of Business of Evidence report 2016 at [https://www.mrs.org.uk/pdf/boe\\_info.pdf](https://www.mrs.org.uk/pdf/boe_info.pdf).



5. The UK research sector is recognised as leading the way in the development of creative and innovative research approaches including maximising the opportunities afforded by the development of new digital technologies. The methodological issues are explored and debated in the academic journal, the International Journal of Market Research.

### **Submission: Ethics and Role of Government**

6. MRS welcomes the opportunity to respond to the Call for Evidence by the Select Committee considering the economic, ethical and social implications of advances in artificial intelligence. Our response focuses on the ethical implications of artificial intelligence and suggests that the regulatory framework needs to encompass both legal and self-regulatory initiatives that build consumer trust.
7. Market research, which includes social and opinion research, is the systematic gathering and interpretation of information about individuals or organisations using the statistical and analytical methods and techniques of the applied social sciences to gain insight or support decision making. Research itself does not seek to change or influence opinions or behaviour. Artificial intelligence (AI) with its complex software systems is used in the research sector especially in data mining and analysis. In big data analytics developments in natural language processing (NLP) and machine learning models are aiding the automation of data analysis, data collection and report publication.
8. The General Data Protection Regulation, which will come into force in the UK on 25th May 2018, provides a robust legal background for control of artificial intelligence with strengthened individual rights, a focus on transparency and accountability and provisions that address automated decision making. However this framework needs to be underpinned by continued regulatory guidance from the Information Commissioner's Office (ICO) such as their recent carefully balanced informative paper "Big data, artificial intelligence, machine learning and data protection" which carefully considers key issues such as privacy and consent.<sup>4</sup>
9. Critically, in order to control AI, the regulatory framework will need to evolve nimbly and flexibly with respect for protection of personal data of individuals at the core. In light of this the legal framework will need to be supplemented by an ethical framework

---

<sup>4</sup>ICO Big Data Paper:430

<https://ico.org.uk/media/for-organisations/documents/2013559/big-data-ai-ml-and-data-protection.pdf>



– based on by self-regulatory and trust frameworks such as such as the MRS Code of Conduct and the MRS Fair Data Scheme - which will ensure that organisations take their obligations seriously and implement AI and use data in a fair and transparent manner.

10. Consumer facing marks with consumer recognition are a useful tool in building consumer trust across markets and can form a vital part of the framework for regulating the use of AI. Organisations, public, private and not-for-profit, using AI need to understand the nuances of consumer privacy preferences as it applies to their particular market and organisation in order for them to properly determine the right balance in the use of AI. Use of ethics boards and ethics reviews committees and processes within a self-regulatory framework will be important tools.
11. MRS adopted its first self-regulatory Code in 1954 and the latest fully revised version of the MRS Code of Conduct came into effect on 1 September 2014.<sup>5</sup> It is currently being revised to reflect legal changes and ensure it reflects emerging technological developments. Supported by a suite of guidance documents the Code supports those engaged in market research in maintaining professional standards and reassures the general public that research is carried out in a professional and ethical manner. The MRS Code is technology and methodology neutral. It sets out overarching ethical principles supported by rules of conduct..
12. Additionally, a broader range of firms have signed up for the MRS Fair Data mark, which was established in 2012 to complement the self-regulatory arrangements under the Code. This trust mark, is designed for use by consumer-facing firms, suppliers of research and data services, and public bodies. It enables consumers and citizens to make educated choices about their data and to identify organisations which they can safely interact with, knowing that their personal information is safe. For organisations that are accredited, it demonstrates a commitment to be ethical, transparent and responsible with data. Organisations sign up to ten clear principles that are consumer focused, enabling ease of understanding. These ten core principles of Fair Data work in tandem with the MRS Code of Conduct. The scheme is supplemented by MRS's Fair Data advisory service which includes face-to-face, telephone and e-mail support plus events on best practice, best practice guidance and a bespoke audit accreditation process which is mandatory for all organisations that are not MRS Company Partner accredited.

---

<sup>5</sup> MRS Code of Conduct <https://www.mrs.org.uk/pdf/mrs%20code%20of%20conduct%202014.pdf>



13. We believe data privacy, compliance and ultimately building consumer trust, are critical. If the public become more afraid of sharing their personal data, the effect could have long term implications for research participation, development of innovative commercial solutions and society. This is even more critical in light of the increased use of AI where opacity of processing and varied levels of human intervention raise specific concerns for individuals. Credible, robust self-regulation and trust marks will be key tools in raising awareness about the collection and use of data and assist both firms and consumers in benefitting from the use of AI. Codes of conduct can adequately address these issues, using consultative processes, to ensure codes enshrine privacy and transparency and reflect societal expectations from use of this new constantly evolving technology.

For further information or clarification on this submission please contact Dr Michelle Goddard, Director of Policy and Standards, ([michelle.goddard@mrs.org.uk](mailto:michelle.goddard@mrs.org.uk) 020-7566-1882). This submission is made on behalf of The Market Research Society, 15 Northburgh Street, London EC1V 0JR. The Market Research Society is a company limited by guarantee, registered in England No. 518685.

6 September 2017