



The Rt Hon Nicky Morgan, MP
Chair of the Treasury Committee
House of Commons, Committee Office
London
SW1A 0AA

4th October 2018

Dear Nicky

Re Opinion Polling

We met when you and Seema Malhotra kindly co-hosted the launch of our Diversity report for the Research Sector. John Curtice of the British Polling Council has made me aware of your queries. Much of what you ask is covered by our Code of Conduct. I hope the following explanation is useful.

As you may be aware the Market Research Society (MRS) is the world's oldest and largest research association. At the core of this is our work to develop, support and regulate standards and innovation across market, opinion and social research and data analytics, (of which political opinion polling is only a small part). We regulate research ethics and standards of the profession through our Code of Conduct. Our regulation extends to both accredited individual members and organisations who must comply with the MRS Code in conducting all their professional activities (both research and non-research activities).

The MRS Code of Conduct is of general application to the research sector and in light of that the framework is also applicable to the work of those polling organisations who are accredited members. The underlying concerns of the proposed recommendations are addressed through the general principles of professional conduct as well as the more detailed rules of conduct in the Code.

The overarching principles in the Code clearly set out and identify professional expectations which should be embedded in research practice. Explicit obligations are placed on researchers to be "straightforward and honest in all their professional and business relationships", "balance the needs of individuals, clients and their professional activities" and "protect the reputation and integrity of the profession".

Additionally there are specific Code rules addressing conflicts of interests and promoting transparency and disclosure by researchers. These include:

- Rule 2: "Members must take reasonable steps to avoid conflicts of interest with clients and or employers and must make prior voluntary and full disclosure to all parties concerned that might give rise to such conflicts".
- Rule 3: "Members must act honestly in their professional activities."



- Rule 5: “Members must not to act in a way which might bring discredit on the profession, MRS or its members”.

Client confidentiality is addressed in Rule 10 of the Code which requires that researchers only disclose the identity of the client with their permission or where there is a legal obligation to do so. However developments in data protection law and practice, with the adoption of the EU General Data Protection Regulation and the Data Protection Act 2018, means that greater disclosure of client details is increasingly likely across all types of research projects including opinion polling.

Protection of research participants and members of the public is also specifically addressed in the MRS Code. In particular Rules 16 and 18 promote transparency and informed consent of research participants:

- Rule 16 requires that members must ensure that participants give their informed consent when personal data is collected directly from them
- Rule 18 requires that members provide sufficient information to allow informed consent to be given. This rule sets out information that must always be given but is also context specific requiring members to consider and identify on a case by case basis the type of information that is relevant in each situation.

These rules are supplemented by Rule 35 which clearly requires that participants must not be misled when being asked to take part in a project.

More broadly there are a number of reporting rules that aid transparency in reporting research results, for example Rule 53 of the Code requires that members ensure that their reports include sufficient information to enable reasonable assessment of the validity of results.

In light of the breadth and ambit of the Code we are of the view that the issues raised are adequately covered by the MRS Code. We work closely with the British Polling Council, but whilst most reportable polling organisations are either accredited as companies, or have individuals professionally accredited, a very few chose not to do so. As is our current practice, we continue to regularly review the Code to ensure that it is up to date. We also publish specific guidance as it is appropriate to ensure proper interpretation and application of the rules in a specific context such as opinion polling.

Yours sincerely,

A handwritten signature in blue ink that reads 'Jane Frost'. The signature is written in a cursive, flowing style and is positioned above a thin horizontal line.

Jane Frost CBE
Chief Executive Officer