



MRS response to Ofcom's call for input: Options to address mobile spoofing

About the Market Research Society

- 1.1. [The Market Research Society \(MRS\)](#) is the UK professional body for market, opinion and social research, insight and analytics. MRS is the world's largest and oldest research association, representing 5,000 individual members and over 600 accredited Company Partners 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.
- 1.2. MRS' expertise as the lead authority on market, opinion and social research is recognised around the globe. MRS provides the policy and standards expertise for the UK plus a number of global associations including EFAMRO the European Research Federation and EPHMRA the international healthcare research association. MRS also has close business ties with other research associations around the world via its participation in the [Global Research Business Network \(GRBN\)](#) plus formal agreements with associations in the US, Australia and Japan.
- 1.3. 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 MRS members and Company Partners agree to regulatory compliance of all their professional activities via the MRS Code of Conduct and its associated disciplinary and complaint mechanisms.
- 1.4. More information about MRS can be found on the MRS website:
<https://www.mrs.org.uk/>

2. About Market, Opinion and Social Research

- 2.1. Market, opinion and social 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. It involves systematic study of different spheres of society, politics, and the economy. Research, insight and analytics stand at the heart of all well-informed commercial, social and political decisions. Insight into what makes a product, business initiative or government policy work is often the hidden – yet defining – factor between success and failure. It is our sector that provides the deeper intelligence needed for our world today.

3. The UK Market, Opinion and Social Research Sector

- 3.1. There are circa 3,100 active registered businesses in the UK listing market research and opinion polling as their primary activity, and a further 1,700 listing market research and opinion polling as a subsidiary activity.

- 3.2. The UK research, insight and analytics sector is a great UK success story. The UK is an £9bn market for research and is the second largest research market in the world, second only to the US¹.
- 3.3. 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 (IJMR)².

4. Purpose of our Response

- 4.1 The MRS supports Ofcom's Call for Input to address mobile spoofing; particularly to protect UK citizens from harm caused by mobile spoofing. Telephone interviewing is an essential research method in the research sector, and CLI's have a critical role in building mutual trust between researchers and participants (data subjects). Although the call for input relates specifically to inbound international calls spoofing UK mobile numbers, we are appealing to Ofcom to protect the rights of the research sector.
- 4.2 Telephone interviewing is used for approximately 15% of market, social and opinion research projects in the UK. In order for research to have value for government, businesses and the public it must be representative of the views of all UK citizens. Conducting telephone research is one of the most efficient and cost-effective ways of ensuring a representative sample of the UK population, and as a result is widely used in government research. Telephone research is also one of the best methods for researching otherwise hard to reach segments of the UK population, another key target for many public sector research projects. It is imperative that this mode of communication remains open to research and that it not be abused or subject to misuse.
- 4.3 MRS is calling for Ofcom, in the development of future guidance to implement a provision which provides for the explicit exemption covering telephone-based research. The research sector relies heavily on the use of CLI's in order to conduct valuable research across the UK and Crown Dependencies.

What is the scope and scale of consumer harm caused by spoofed UK mobile numbers?

What are the consumer impacts of spoofed UK mobile numbers more broadly

- 4.4 Spoofed numbers can be used to impersonate legitimate research organisations, leading consumers to divulge sensitive information, including financial information, personal data, such as addresses, email addresses, and other contact details, or consumers may become subject to phishing attacks, whereby they are tricked or coerced into clicking on fraudulent links. This affects legitimate research practitioners seeking to build rapport with potential participants (data subjects) and conduct research projects. It also erodes confidence in legitimate research businesses and undermines the reputation of the profession.
- 4.5 The larger share of the research sector (3,100 active registered businesses) subscribes to the MRS Code of Conduct, which prescribes high ethical standards in the conduct and practice of research. The Code of Conduct, among other things, requires members to:
- Rule 3: Be transparent as to the subject and purpose of data collection.

¹ See Industry size and growth rates: <https://www.mrs.org.uk/resources/industry-size>

² For more information about IJMR: <https://journals.sagepub.com/home/mre>

- Rule 4: Ensure that their professional activities are not used to unfairly influence views and opinions of participants.
 - Rule 5: Respect the confidentiality of information collected in their professional activities.
 - Rule 6: Respect the rights and well-being of all individuals.
 - Rule 7: Ensure that individuals are not harmed or adversely affected by their professional activities.
 - Rule 8: Balance the needs of individuals, clients, and their professional activities.
- 4.6 Where spoofed numbers and scammers impersonate legitimate research practitioners and suppliers, this not only erodes confidence in the research sector but demoralizes the value of ethical standards and best practice, established by organisations such as, MRS. Scammers and illegitimate businesses abroad undertake activities such as 'sugging', which is the practice of selling under the guise of research or 'frugging', fundraising under the guise of research.
- 4.7 By sugging or frugging, scammers use the appearance of conducting research, which is commonly understood not to involve any form of commercial message, to materially distort the economic behaviour of the average consumer to whom it is addressed. Consumers may feel obliged to provide information, whilst under the misapprehension that an activity is purely for research purposes, which is later actually used for commercial gain.
- 4.8 Spoofed CLI's also violate privacy regulations; collecting personal data without securing consent or conducting legitimate research in accordance with rules established in the GDPR. This data can be sold to third parties, misused or abused all of which is unknown to the data subject.
- 4.9 Spoofing also causes psychological distress. The MRS Code of Conduct requires members to have due regard for the wellbeing of data subjects, however, scammers are typically relentless with contact, coercive and manipulative. Where scammers are imitating research practitioners, this again engenders distrust with legitimate research practitioners and suppliers.

Experiences and impact to Market Research

- 4.10 At present research businesses are required to rotate between over 40 different CLIs to mitigate the impact of call blocking. Businesses use numbers including 0800, 0330, 07 and area specific numbers, all of which have been impacted with blocking, despite the volume of calls decreasing over the course of 2024.
- 4.11 Additionally, the logic and pattern behind each CLI seems to be arbitrary. There are occasions whereby blocking is more frequent with B2C as opposed to B2B, or where predictive dialling enabled on large volumes of samples and where small projects take place with interviewers manually contacting research participants – both of which are blocked at large. Businesses have had experiences of running large projects, successfully using only two CLIs and small projects with a single interviewer who was largely blocked from making calls.
- 4.12 This issue also seems to be prevalent across a range of networks and not all happening at the same time – businesses have had instances of being blocked from several major networks including O2, Vodafone and EE.
- 4.13 When Research businesses source new CLIs, during tests to ensure they had the appropriate voicemail message playing if called back, some of these numbers are already being highlighted as potential spam numbers, despite never being used.

This has occurred when running tests and calling the test numbers, which is a significant concern.

- 4.14 Research agencies have also learned that despite being blocked, the network providers do not necessarily notify the respondent that a call has been attempted.
- 4.15 The impact has been significant to the research industry, including financial impacts, negative impacts on response rates and the ability to reach certain demographics. Where organisations have had some panel recontact work (which has been consented to by the research participant), there have been issues reaching those who have opted in to taking part in different studies as a result of their telephone numbers being with providers who are blocking legitimate market research.
- 4.16 Finally, when a CLI is blocked, on some occasions it does not seem to be permanent. CLI's have been retried over the course of different projects, over a period of time, and a number that was previously blocked, will work on another project. Once again, there is no clear logic or specific pattern with the use of CLIs and the length of time it appears to be blocked varies.
- 4.17 Legitimate businesses are being limited and prohibited from conducting research because there are no clear guidelines for the use of CLI's; where an effort should be made to distinguish spoofing calls and legitimate research, and therefore to provide exceptions for market research, instead there is a blanket, one-size-fits-all approach. This in turn significantly hinders the efforts of the Research industry to obtain a diverse data pool and reach vulnerable members of society, and has a significant financial impact to legitimate business, and delegitimizes the reputation and confidence in research.

Protecting Telephone Research

- 4.18 Telephone research is essential for access to groups who may not be accessing the internet on a frequent basis, even if the internet is available to them. Telephone research and the continuous access and enabled use of CLIs, enables researchers to engage with people who are not empowered to move outside freely and supports the needs of members of the public who may be semi/illiterate; have a poor proficiency of the local language; older or disabled, and telephone research allows for human engagement.
- 4.19 This represents the importance of representation and inclusivity, allowing for a broad spectrum of society to be engaged in research, meeting their diverse needs and meeting the potential for maximum representation.
- 4.20 To conclude, we support the efforts and potential future consultation from Ofcom to amend the uses of CLIs from inbound international spoofing calls. However, we want to ensure that the rights of legitimate research practitioners are upheld, and with it too the use of CLIs for legitimate purposes such as market, social and opinion research.

We welcome discussing these matters further, and we welcome the opportunity to discuss the MRS submission in response to Ofcom's Call for Input: Options to address mobile spoofing

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