

# MRS Code of Conduct (Updated 14/05/26)

## General Rules of Professional Conduct

No.	Description	Our Comments	Team(s)
<b>Awareness and Adherence with Legislation</b>			
1	Members must ensure that their professional activities conform to the national and international legislation relevant to a given project, including the UK data protection legislation. Members must ensure that they adhere to all relevant legal and ethical requirements when conducting their professional activities.	Customer data is protected, and surveys are carried out in a professional and ethical manner. Data is only held in our Private folders, and is accessed by responsible officers via reports held on MS Teams. Wider stakeholders only see full results, and no customers are identifiable.  Language Line facility is available to deal with barriers in this way. Ways to overcome barriers, try to make the service inclusive as possible.	Customer Experience Team
2	Members must ensure that when undertaking direct marketing activities, they adhere to all relevant specific legal and ethical requirements which apply to direct marketing practice.  <b>Comment:</b> The following practices fall within the scope of direct marketing:  a) The offering of client goods or services, or vouchers to purchase client goods or services as an incentive, reward or expression of thanks; b) The use of promotional language in describing clients in invitations or introductions to projects; c) The offering of materials to participants which promote clients or their products and services. This includes referring participants to a client website at the conclusion of a project.  Members may provide information about a client's products or services where it is necessary to avoid adversely affecting a participant. For example, where a sensitive subject has been discussed, Members may provide information on relevant help lines operated by a client. This could include wellbeing information and advice to assist with financial difficulties.  <b>Comment:</b> The information provided on the client's products or services as noted above must not double up as marketing/promotional communications	We do use surveys to signpost customers to services we offer on transactional surveys, which may help them, or improve the services we offer to customers. Surveys can include the following:  <ul style="list-style-type: none"> <li>• Provide information on MyAccount, which we provide information about on many surveys, but only as a way of informing them this exists as an option.</li> <li>• Many of the surveys ask if they would like to get involved in shaping the services which One Vision Housing provides. Customers can leave their e-mail address for a follow up contact, or not (if they are not interested).</li> </ul> These options are not promotions, as such, just providing information. Also, the Outbound Survey Assistants may advise the customer to contact our Customer Service Centre again, if a particular problem has not been resolved.	Customer Experience Team
3	Members must ensure that all of their professional activities, whatever the purpose, are conducted in a transparent manner and that their activities promote compliance with privacy ethics and data protection rules.	We are transparent, and only ask questions on how the customer feels about the services we provide (transactional surveys), or the organisation as a whole (Tenant Satisfaction Measures Survey). Results are only shared with those in the organisation who manage the services we are surveying about, and no one else.	Customer Experience Team
4	Members must never undertake any activities, under the guise of research, which aim to manipulate, mislead or coerce individuals. This applies throughout the research process including proposal, data collection, analysis and reporting. Examples of this activity include:  a) Sell or market under the guise of research ('sugging') b) Fund raise under the guise of research ('frugging') c) Lobby for political purposes under the guise of research ('plugging') d) Create false media content and commentary, including social media, under the guise of research ('media-mugging').	We would not do this. Our survey programme is only to determine whether customers are satisfied with the services we offer. We ask for honest opinions in order to identify areas for improvement, and have no other motive than that.	Customer Experience Team
<b>Business and Professional Ethics</b>			
5	Members must take reasonable action to avoid conflicts of interest with clients or employers and must make prior voluntary and full disclosure to all parties that might give rise to such conflict.	Surveys are carried out with customers, to gather intelligence on services which the organisation provides. No conflicts of interest have come up as yet.	Customer Experience Team

6	Members must act honestly in their professional activities.	All parties are trained in their roles, and understand that customer data is to be protected. Surveys are carried out in a sensitive manner, and customers are not obliged to complete them if they choose not to.	Customer Experience Team
7	Members must take reasonable action to ensure that others do not breach or cause a breach of this Code.	Please see above.	Customer Experience Team
8	Members must not act in a way which might bring discredit on the profession, MRS or its Members.	Surveys are carried out in an honest and open manner. The Outbound Survey Assistants are courteous with customers, and act professionally.	Customer Experience Team
9	Members must take all reasonable precautions to ensure that participants are not harmed or adversely affected by their professional activities and ensure that there are measures in place to guard against potential harm.	Surveys are carried out in a sensitive manner, particularly around complaints and antisocial behaviour. Customers can also opt out, if they do not want to discuss their experiences. We would not pressure anyone to complete a survey if they felt this would adversely affect them, when recalling any negative experiences.  Outbound Survey Assistants will flag any concerns or issues, to ensure customers are protected. This will not happen often, but they ensure that customers concerns are flagged.	Customer Experience Team
<b>Commissioning and Design</b>			
10	Members must not knowingly take advantage, without permission, of unpublished work of other practitioners, which is the property of those other practitioners.  <b>Comment:</b> This means, where applicable, that Members must not knowingly carry out or commission work based on proposals prepared by practitioners in another organisation unless permission has been obtained.	This would not happen. We carry out our own surveys, with One Vision Housing and Pine Court Housing Association customers.	Customer Experience Team
11	Members must take reasonable steps to design projects to the specification and/or quality standards agreed with clients.	Survey programmes, and results, have been approved by the Board, Executive Management Team, and form part of the Customer Care Charter. This last item was agreed with customers, and survey results feed into this.  Also, we abide by the regulators guidance for the collection of Tenant Satisfaction Measures Survey data.  Surveys are designed in consultation with service providers, so questions are only asked which are relevant to them.	Customer Experience Team
12	Members must carry out a Data Protection Impact Assessment (DPIA) or risk assessments for specified types of processing prescribed by data and privacy legislation and for any other processing that is likely to result in a high risk to participants.	We abide by recommendations for the ideal processing of data. In terms of potential risks, ASB Survey lists are shared with the Community Safety Team prior to use, and only customers they deem safe to survey will be contacted. This is to ensure customer wellbeing.	Customer Experience Team
13	Members must ensure that the rights and responsibilities of themselves, clients, and sub-contractors as controllers or processors are governed by a written contract.	Service Level Agreements are in place to ensure that each party knows their responsibilities. Guidance is provided with surveys, such as ensuring that customers are not contacted if consent is not given.	Customer Experience Team
<b>Client Confidentiality</b>			
14	Members must disclose the identity of clients where there is a legal obligation to do so.  <b>Comment:</b> Transparency is one of the fundamental principles underpinning data protection laws. In line with this is an obligation to name a commissioning client, which may arise in three main scenarios:  a) Client is controller or joint controller b) Client is the source of the personal data c) Client is receiving personal data from a research activity	We are transparent in all our practices, and would abide by any/all requests.	Customer Experience Team

15	<p>Where files of identifiable individuals are used e.g., client databases, Members must ensure that the sources of the personal data is revealed at an appropriate point in the data collection.</p> <p><b>Comment:</b> The identity of the client must be revealed when data collection is undertaken if clients require personal data from a project.</p>	<p>We are transparent in all our practices, and would abide by any/all requests.</p>	<p>Customer Experience Team</p>
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Children			
16	Members must ensure that permission of a responsible adult is obtained and verified before a child participates in their professional activities.  <b>Comment:</b> See also MRS Guidelines for Conducting Data Collection Activities with Children. Under special circumstances, permission to waive the requirement for permission of a responsible adult may be obtained, but only with the prior approval of the MRS Market Research Standards Board. To request a waiver, contact the MRS standards department via <a href="mailto:codeline@mrs.org.uk">codeline@mrs.org.uk</a> .	Not applicable. We would only ask the lead tenant, or another customer living in the property to participate in a customer intelligence project.  Rarely, some customers will leave care at 17, so could apply in some instances. However, the number is so small that we may never survey them.	Customer Experience Team
17	Where the permission of a responsible adult is required, Members must ensure that the responsible adult is given sufficient information about the project to enable them to make an informed decision.	Please see item 16.	Customer Experience Team
18	Members must ensure that the identity of the responsible adult giving permission to approach a child to take part in their professional activities is recorded by name, and relationship or role.	Please see item 16.	Customer Experience Team
19	Where it is known (or ought reasonably to be known) that participants may include children, Members must ensure participants are asked to confirm their age before any other personal information is requested. Further, if the age given is under 16, the child must be excluded from giving further personal information until the appropriate permission from a responsible adult has been obtained and verified.	Please see item 16.	Customer Experience Team
20	Members must take special care when considering whether to involve children in projects. The project design must take into account their age and level of understanding.  <b>Comment:</b> Privacy notices and other information supplied for a project must be presented in a format that can be understood considering age and level of understanding of child participants. See also the ICO's Age Appropriate Design Code (the 'Children's Code') for further guidance for online services likely to be accessed by children.	Please see item 16.	Customer Experience Team
21	In all cases, Members must ensure that children have the opportunity to decline to take part, even when responsible adult permission has been obtained. This remains the case if a project takes place in school.	Please see item 16.	Customer Experience Team
22	Members must ensure that information about other individuals is not collected from a child unless for the purposes of gaining permission from a responsible adult.	Please see item 16.	Customer Experience Team
Vulnerable People			
23	Members must take reasonable steps to assess, identify and consider the particular needs of vulnerable people involved in their professional activities.  <b>Comment:</b> See MRS Best Practice Guide on Research Participant Vulnerability	There are warning markers in our housing management system (NEC), and client considerations on One Serve, which identify client needs. Also, some customers have asked that surveys are not carried out. This is respected, and markers are also available for Outbound Survey Assistants on our NEC system, which would specify if there are hearing impairments, etc.  Outbound Survey Assistants are considerate, and will work with customers to carry out surveys. Also, the Outbound Survey Assistants share knowledge on how best to meet customers needs.  On the Tenant Satisfaction Measures Survey, if the customer does not want to complete the form over the phone, we ask if another format would be more suitable to them.	Customer Experience Team
24	When working with vulnerable people, Members must ensure that such individuals are capable of making informed decisions and are not unfairly pressured to cooperate with a request to participate and that they are given an opportunity to decline to take part.	All customers can decline. We would not pressure anyone to take part, and ask for their consent to be surveyed as a matter of course.	Customer Experience Team
Incentives			

25	Members must ensure that client goods or services, or vouchers to purchase client goods or services, are not used as incentives for projects conducted for research purposes. Members undertaking projects for other purposes, such as direct marketing, may use client goods or services as incentives.	For the One Vision Housing Tenant Satisfaction Measures Survey, there is a £50 incentive which was introduced in 2024/25.  We have offered a prize draw for Pine Court Housing Association Tenant Satisfaction Measures too, to try and increase the number of participants. As this is a small customer group (520 customers), this is a way of encouraging further responses.	Customer Experience Team
26	Where incentives are offered, for whatever purpose, Members must ensure that Participants are clearly informed:  a) who will administer the incentive; b) what the incentive will be; c) when the participant will receive the incentive; and d) whether any conditions are attached e.g. completion of a specific task or passing of quality control checks.  <b>Comment:</b> Incentives that require participants to spend money to be redeemed, e.g. money-off vouchers, are not permitted.  For further information, Members should consult the separate MRS Regulations Administering Incentives and Free Prize Draws and MRS Use of Incentives in Market Research and Non-research Projects.	For the One Vision Housing Tenant Satisfaction Measures Survey, there is a £50 incentive which was introduced in 2024/25. Outbound Survey Assistants explain that this a random selection, and any customer who completes the survey is eligible for this.  We have offered a prize draw for Pine Court Housing Association Tenant Satisfaction Measures Survey, to try and increase the number of participants. As this is a small customer group (520 customers), this is a way of encouraging further responses. However, we have asked for honest and open feedback, and do not expect it would influence responses. We have made it clear that Pine Court Housing Association will pay out the prize draw.	Customer Experience Team

## Collection and Analysis

No.	Description	Our Comments	Team(s)
<b>Data Collection</b>			
27	Members must ensure that there is a lawful basis for any collection and processing of personal data undertaken as part of their professional activities.  <b>Comment:</b> See lawful bases for processing data within the MRS Data Protection guidance. This includes passive data collection, see MRS Data Collection Checklist.	The basis for collection is in line with other Housing Associations, as we collect the data to monitor services, and put improvements in place when necessary to improve customer perception.  With the Tenant Satisfaction Measures Survey, we are following prescribed guidelines, which have been put in place by the regulator.	Customer Experience Team
28	Members must take reasonable action when undertaking data collection to ensure all of the following:  a) that data collection processes are fit for purpose and clients have been advised accordingly; b) that the design and content of data collection processes are appropriate for the audience being analysed; c) that participants are able to provide information in a way that reflects the view they want to express, including don't know/prefer not to say; d) that participants are not led toward a particular point of view; e) that responses and/or data collected are capable of being interpreted in an unambiguous way; f) that any potential use of the personal data is revealed; g) that personal data collected and/or processed is limited to what is relevant; and h) that personal data is stored and transmitted by secure means and only accessible to authorised individuals.  <b>Comment:</b> Rule 28 a) would apply in circumstances where data collection methods had to be changed to address factors affecting the population as a whole, such as a pandemic.	An explanation is provided at the beginning of each survey form, outlining the purpose.  We have Included Not applicable / Don't know options on surveys, when appropriate, to ensure customers are not pressured into a response.  No personal data would be revealed, just general questions are asked.	Customer Experience Team

29	<p>Members must ensure that participants are informed about any recording, monitoring or observation at recruitment and at the beginning of a data collection activity.</p> <p><b>Comment:</b> This includes surveillance activities, such as using CCTV and mystery shopping. The latter can only be recorded when undertaking own organisation mystery shopping and staff have been informed of this eventuality. See also MRS Guideline: Conducting Mystery Shopping</p>	<p>Survey calls are not recorded and monitored in terms of audio. They are recorded in the Microsoft Customer Voice 365 software, which is a secure system used to carry out surveys.</p> <p>The only time someone would be observing is if training was being carried out with a new Outbound Survey Assistants, and they were shadowing an experienced member of staff.</p>	Customer Experience Team
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Permission and Consent			
30	<p>Members must ensure that participants give their permission to take part in a data collection exercise, before proceeding with the activity. Permission requires the following information to be provided to participants:</p> <ul style="list-style-type: none"> <li>a) the name of the organisation(s) or individual responsible for data collection;</li> <li>b) the general subject of the data collection;</li> <li>c) the purpose of the data collection;</li> <li>d) the type of data collected, particularly special category and/or criminal convictions data;</li> <li>e) the right to withdraw at any time;</li> <li>f) whether the data collection is to be recorded and/or observed;</li> <li>g) who is likely to have access to live or recorded information;</li> <li>h) the likely length in minutes of the data collection;</li> <li>i) any costs likely to be incurred by a participant;</li> <li>j) an assurance that the activity is being conducted in accordance with the MRS Code of Conduct and the relevant data protection legislation which applies in the areas where activities are taking place.</li> </ul> <p><b>Comment:</b> This applies to all legal basis for processing data, including when data is collected using passive techniques. Permission is defined in Definitions used in the MRS Code of Conduct.</p>	<p>We ask for consent before a survey can proceed, and would not ask any questions if the customer does not want to continue.</p> <p>We would explain the purpose of the survey, and the organisation who is carrying out the project (which would typically be One Vision Housing or Pine Court).</p> <p>No costs would be incurred, as it would be us who are calling them. E-mail and SMS surveys would be following a link to a website, so the cost would be extremely small. Again, the customer would not be compelled to click the link if they do not want to, and can opt out.</p> <p>Customers are not pressured to complete a call, and can withdraw.</p> <p>Calls are not recorded.</p> <p>Outbound Survey Assistants do advise an estimated time for completion. On e-mail surveys we would also provide an estimate.</p>	Customer Experience Team
31	<p>If consent is the legal basis for a data collection exercise, Members must ensure that participants are provided with appropriate information to allow informed consent to be given, at the point that they agree to participate. Informed consent requires the following information to be provided:</p> <ul style="list-style-type: none"> <li>a) the name of the organisation(s) or individual responsible for data collection;</li> <li>b) the general subject of the data collection;</li> <li>c) the purpose of the data collection;</li> <li>d) the type of data collected, particularly special category and/or criminal convictions data;</li> <li>e) the right to withdraw at any time; whether the data collection is to be recorded and/or observed;</li> <li>f) who is likely to have access to live or recorded information;</li> <li>g) the likely length in minutes of the data collection;</li> <li>h) any costs likely to be incurred by a participant;</li> <li>i) the use of automated decision making (if used);</li> <li>j) transfer of data to a third country;</li> <li>k) retention periods or criteria used to determine retention periods;</li> <li>l) the right to complain; and</li> <li>m) an assurance that the activity is being conducted in accordance with the MRS Code of Conduct and the relevant data protection legislation which applies in the area where activities are taking place.</li> </ul> <p><b>Comment:</b> Consent is one lawful basis for processing, but there are alternatives, particularly when data is collected using passive techniques. Consent is defined in Definitions from the General Data Protection Regulation used in the MRS Code of Conduct. See also Data Protection and Research: Guidance for MRS Members and Company Partners for more detail about alternative lawful bases.</p>	<p>Please see above for further details.</p> <p>We explain the reason behind the survey call, so customers understand.</p> <p>We only ask about the experience of a service, or the organisation as a whole, so there would be no need to discuss a special category of data.</p> <p>There would be no transfer of data to a third country. Overall results can be accessed on the website, but these documents do not contain any personal information.</p> <p>Calls are not retained or recorded.</p>	Customer Experience Team
32	<p>Members must ensure that participants are not misled when being asked to participate in a project.</p>	<p>Surveys are designed to be clear in what we are asking, and the questions stick to the subject at hand. Outbound Survey Assistants will explain why we want to collect data, such as calling about their experience of a recent repair.</p>	Customer Experience Team

33	Members must exercise special care when the nature of a project is sensitive or the circumstances under which the data is collected might cause a participant to become upset or disturbed.	This mainly applies to ASB and Complaints. The Outbound Survey Assistants carry out surveys in a sensitive manner, and do not pressure respondents to participate in the first place. They will record their thoughts and feeling in as authentic way as possible.	Customer Experience Team
34	Members must ensure that a participant's right to withdraw from a project at any stage is respected.	If a customer does not want to continue, they would respect this. It is not in anyone's interest to record a survey from a customer who is unwilling to participate.	Customer Experience Team
35	Members must ensure that participants are able to check without difficulty the identity and bona fides of any individual and/or their employer conducting a project (including any sub-contractors).	This is simple to do, as the Outbound Survey Assistants are identified on survey raw data. Also, the Customer Intelligence Assistant is identified on reports as the responsible member of staff, overseeing a project.  Introductory text is typically provided, explaining how a project was carried out.	Customer Experience Team
36	Members must take reasonable action to ensure that data collection activities do not take place before 9am Monday to Saturday, 10am Sunday or after 9pm any day, unless by prior agreement. This includes:  a) In person visits to private homes b) Calls to household landline numbers c) Calls to mobile telephone numbers d) Messages via SMS or other direct message facilities to mobile phones  <b>Comment:</b> The only exception to this is where local rules and customs differ from UK practice.	Outbound Survey Assistants do work within normal operating hours, beginning after 9am and ending at 6pm.  Customers may ask for a call back at a specific time, though this would only happen with their consent.  Mon - Fri are usual working hours.  Text messages would not be sent outside the hours specified (9am - 9pm).	Customer Experience Team
37	Members must ensure that participants (including employees in employee data collection projects) are not required or pressured to participate in any projects.	We would not pressure anyone. Consent has to be provided for us to continue with the survey. On telephone surveys, this is a Yes/No question at the beginning. If a respondent says 'No', we will not continue.  With E-mail/Text, we ask customers to participate, but they can ignore/opt out.	Customer Experience Team
38	Members must ensure that any responses given by participants during data collection are deleted if requested by participants, where possible if the personal data is still being processed.  <b>Comment:</b> Individuals' rights to erasure can be challenged if the processing is based on the public task legal basis. The rights of individuals to request erasure should be considered unless there are overriding legal considerations. In public task cases where erasure is denied, individuals still have a right to object to the processing via the data protection regulators, e.g the ICO in the UK.	We would do this if it was requested.	Customer Experience Team
<b>Observers</b>			
39	If Members have agreed with clients that observers are to be present, (either in person or remotely) during a data collection exercise with participants, Members must inform all observers about their legal and ethical responsibilities.  <b>Comment:</b> See MRS Guide to Observers – Legal & Ethical Responsibilities.	We do not have observers in telephone surveys. Unless, as stated above, we were training a new Outbound Survey Assistant. This is to ensure they understand the role, and are able to carry it out at a high standard.	Customer Experience Team
40	Members must clarify with participants the capacity in which observers are present; clients must be presented as such, even if they are also practitioners and/or Members of MRS.	We do not have observers in telephone surveys. Unless, as stated above, we were training a new Outbound Survey Assistant. This is to ensure they understand the role, and are able to carry it out at a high standard.	Customer Experience Team

41	<p>There are some situations where observers could adversely affect participants' interests and/or wellbeing, and in such instances, Members must:</p> <p>a) ensure that participants are told at an appropriate stage the identity of any observer who might be present during an exercise.  b) where observers may know participants, ensure that participants are informed before the start of the data collection that they are to be observed, with a warning that the observers may include clients and/or other stakeholders who already know them and given a chance to withdraw.</p> <p><b>Comment:</b> The issue of anonymity and recognition is a particular problem in business-to-business and employee projects where sample universes are smaller and as such greater care should be taken for such projects.</p>	<p>We do not have observers in telephone surveys. Unless, as stated above, we were training a new Outbound Survey Assistant. This is to ensure they understand the role, and are able to carry it out at a high standard.</p>	Customer Experience Team
<b>Use of Data for Secondary Purposes</b>			
42	<p>Members must ensure that there is a lawful basis for the further processing of data for a secondary purpose. This may include consideration of:</p> <p>a) Links between the original and proposed new purpose/s.  b) The context in which the data was originally collected (in particular the relationship between participants and the original data collector).  c) The consequences of the proposed secondary processing.  d) The existence of safeguards.</p>	<p>There may be need to refer to overall results, when carrying out another project, but no personal data would be used. For example, if we are comparing transactional results to the Tenant Satisfaction Measures Survey. However, this is just the overall satisfaction score.</p> <p>I do not think using this would constitute a risk.</p>	Customer Experience Team

Re-contacting Participants			
43	Members must ensure that re-contact with a participant is carried out only if the participant's permission has been obtained during the initial data collection. The only exception to this is re-contact for quality control purposes. <b>Comment:</b> Any re-contact question should be agreed at the design stage with the client to cover any planned or possible consequential projects.	We would only do this with the participants consent.  There is a question at the end of each survey which asks if a customer consents for a follow up call. If they say 'No', we do not contact them about the content of the survey.	Customer Experience Team
44	Members must ensure that any re-contact matches the assurances given to participants at the time that permission was gained e.g. when re-contact was to occur, the purpose and by whom.	We would only do this with the participants consent.  If the customer has consented, then a manager/responsible officer will explain why they are calling back, i.e. it is about their responses to a specific survey.	Customer Experience Team

## General Rules of Data Accountability

No.	Description	Our Comments	Team(s)
<b>Data Security</b>			
45	Members must take reasonable action to ensure that all records are held, transferred and processed securely in accordance with relevant data retention policies and or/contractual obligations.	Customer details from the Tenant Satisfaction Measures Surveys are anonymised after one year, as per Data Protection guidance, so only the overall results are retained. There is no way to link the results back to individual customers.	Customer Experience Team
46	Members must take reasonable action to ensure that all parties involved in a project are aware of their obligations regarding the collection, transfer, retention, security, disposal and destruction of data.	All members follow professional standards, and understand the need to protect customer data.	Customer Experience Team
47	Members must ensure that the length of time, or criteria, for retaining personal data is clearly communicated to all relevant parties including participants, subcontractors and clients.	Please see above points.	Customer Experience Team
48	Members must take reasonable action to ensure that the destruction of data is adequate for the confidentiality of the data being destroyed. For example, any personal data must be destroyed in a manner which safeguards confidentiality.	Please see above points.	Customer Experience Team
<b>Participant Anonymity</b>			
49	Members must ensure that the anonymity of participants is preserved unless participants have given their informed consent for their details to be revealed or for attributable comments to be passed on. <b>Comment:</b> This includes digital, audio or visual footage or photographs of identifiable participants which is classed as personal data.	There is a question at the end of each survey which asks if a customer consents for a follow up call. If they say 'No', we do not contact them about the content of the survey.	Customer Experience Team
50	Members must take reasonable action to ensure that anonymization is effective, with reference to developments in technology and to the data environment into which data is released. <b>Comment:</b> This rule applies to anonymisation undertaken by Members and to anonymisation of data sets undertaken by clients prior to analysis by Members. Members should refer to ICO's Anonymisation, Pseudonymisation and Privacy Enhancing Technologies guidance for further detail.	Reports have been tailored for this purpose, so customers who do not want a follow up call will not receive one.	Customer Experience Team
51	Members should be particularly careful that they do not inadvertently identify participants. For example, this may arise: a) where sample sizes are very small (such as business and employee projects); b) where data contains sufficient contextual information to permit identification (such as attributes or descriptions of participants); c) where data can be matched with publicly available information (such as social media profiles); and/or d) where data can be matched with other sources (such as transaction histories held by clients).	Participants details are not released to anyone outside of the staff who use the data to improve their service. All reports which go to stakeholders, especially customers, have no identifiable names/addresses in them.	Customer Experience Team
52	If participants request individual complaints or unresolved issues to be passed back to a client (for example in customer satisfaction projects), Members must comply with these requests. The comments/issues to be passed back to clients must be agreed by Members with participants and must not be linked back to any other data or used for any other purpose without the explicit consent of participants. <b>Comment:</b> There may be cases where participants are requested to contact clients directly. This should be balanced with the needs and abilities of the participant.	If there is follow up requests, then the customer would only be contacted about this, and no other details would be discussed. Contact would only be made if a participant consented to this.	Customer Experience Team

53	Members must ensure that identifiable participant details are not passed on to a third party without the prior consent of the participant. <b>Comment:</b> Data processors are not third parties. Data controllers may change data processors without the consent of data subjects, e.g., the owner of a panel may change platform providers without seeking the agreement of panel members, although the panel members must be notified.	Only those who manage the individual service would review the raw data. Otherwise, only the summary data, with no contact details attached, would be viewed.	Customer Experience Team
<b>Reporting</b>			
54	Members must comply with reasonable requests to make available to anyone the information necessary to assess the validity of any published findings from a project.	We would do this, if requested.	Customer Experience Team
55	Members must ensure that their names, or those of their employer, are only used in connection with any project as an assurance that the latter has been carried out in conformity with the Code if they are satisfied on reasonable grounds that the project has in all respects met the Code's requirements.	Yes, we would do this.	Customer Experience Team
56	Members must allow clients to arrange checks on the quality of the data collection and data preparation provided that clients pay any additional costs involved in this.	Yes, we would do this if asked. Results can be audited, and have been for the Tenant Satisfaction Measures due to their regulatory importance (by Beevers and Struthers). HouseMark audited the approach for transactional surveys in April 2025.  We would comply with any checks which are requested.	Customer Experience Team
57	Members must provide clients with sufficient information to enable clients to assess the validity of results of projects carried out on their behalf.	We do this in the introductory statements in all survey reports, by showing the sample size, and the confidence interval of the results. Guidance on how the confidence is worked out is also provided. This is to ensure that we are transparent, and reassure clients that the results are valid.	Customer Experience Team
58	Members must ensure that data include sufficient technical information to enable reasonable assessment of the validity of results. <b>Comment:</b> Sufficient technical information, in the context of reporting inclusive data, would include reporting sampling characteristics and parameters used when defining samples as representative of segments of the population, such as when reporting Nationally Representative ('Nat Rep') or City Representative ('City Rep') samples.  See the four MRS Best Practice Guides on Collecting Sample Data which cover collecting data on ethnicity, sexual orientation, sex and gender and physical disabilities and/or mental health conditions for more detail.	Please see above. Explanations are provided on the validity of results. Any further information can be provided if anything is unclear, or included in the introductory paragraphs to ensure that the audience of the project is provided with all the information they need.	Customer Experience Team
59	Members must ensure that reports include sufficient information to enable reasonable assessment of the validity of results. <b>Comment:</b> Sufficient information in reports, in the context of reporting inclusive data, would include reporting sampling characteristics and parameters used when defining samples as representative of segments of the population, such as when reporting Nationally Representative ('Nat Rep') or City Representative ('City Rep') samples.  See the four MRS Best Practice Guides on Collecting Sample Data which cover collecting data on ethnicity, sexual orientation, sex and gender and physical disabilities and/or mental health conditions for more detail.	Please see the statement above.	Customer Experience Team
60	Members must ensure that outputs and presentations clearly distinguish between facts, opinion, and interpretation.	This is carried out in any reports which communicate the results of surveys.	Customer Experience Team
61	Members must ensure that findings disseminated by them are clearly and adequately supported by the data.	This is carried out in any reports which communicate the results of surveys.	Customer Experience Team
62	Members must take reasonable action to ensure that findings from a project, circulated and/or published by themselves or in their employer's name, are not incorrectly or misleadingly presented.	All results are peer reviewed to ensure that they are professionally presented, and are not misleading in any way.	Customer Experience Team
63	Members must take reasonable action to check and where necessary amend any client-prepared materials prior to publication to ensure that the published results will not be incorrectly or misleadingly reported. <b>Comment:</b> This means that Members are expected to take reasonable action to ensure that any news releases include either final report details (including question wording for any questions quoted) or details of where the information can be obtained (e.g. via a website link).	Please see above. The documents are peer reviewed, to ensure that they are as accurate, and well presented. Any amendments are made, and the document may go through multiple drafts until they are ready to be shared with clients.	Customer Experience Team

64	<p>If members are aware, or ought reasonably to be aware, that findings from a project have been incorrectly or misleadingly reported by a client they must at the earliest opportunity:</p> <ul style="list-style-type: none"><li>a) refuse permission for the client to use the Member's name further in connection with the incorrect or misleading published findings; and</li><li>b) publish in an appropriate forum (e.g. their website) the relevant technical details of the project to correct any incorrect or misleading reporting.</li></ul>	<p>We would work to ensure that this wouldn't happen, by only releasing the report when they have been signed off. If there were any problems, we would certainly correct this at the earliest opportunity.</p>	Customer Experience Team
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