PUBLIC ATTITUDES TOWARDS ONLINE TARGETING

To inform its Review of Online Targeting and the recommendations it makes to the government, the Centre for Data Ethics and Innovation (CDEI) needed to better understand public attitudes to how data is used to shape people's online experiences.

Given that public awareness of online targeting technology is low, the CDEI chose a deliberative public dialogue approach to allow the public to develop informed opinions and to consider specific policy issues in detail.

The dialogue engaged 147 participants aged 16+ in two days of discussion across seven locations in Great Britain over June-July 2019.

It provided valuable insight into how an informed public trade-off some of the tensions presented by online targeting systems. Through their deliberations, participants provided policymakers with a number of clear priorities and principles for how best to ensure online targeting works for the benefit of users and wider society.

As a result of this research, the CDEI concluded that people do not want targeting to be stopped, but they do want online targeting systems to operate to higher standards of accountability and transparency, and to have meaningful control over how they are targeted. It has recommended regulatory action that takes proportionate steps to achieve these goals.

Ipsos

Centre for
Data Ethics
and Innovation

sciencewise

THE POLICY CONTEXT

Data-driven online targeting is a new and powerful application of technology. Using machine learning, online targeting systems predict what content is most likely to interest people, and influence them to behave in particular ways.

Online targeting is used to drive systems that promote content in social media feeds, recommend videos, target adverts, and personalise search engine results. It is already an important driver of economic value and is a core element of the business models of some of the world's biggest companies. As the underlying technology continues to develop, online targeting will continue to grow in sophistication and it will be used in novel ways and for new purposes.

However, online targeting systems too often lack accountability and transparency. Many uses of online targeting systems fall short of the OECD human-centred principles on AI (to which the UK has subscribed), which set standards for the ethical use of technology.

Online targeting has been blamed for a number of harms. These include the erosion of autonomy and the exploitation of people's vulnerabilities; potentially undermining democracy and society; and increased discrimination. The evidence for these claims is contested, but they have become prominent in public debate about the role of the internet and social media in society.

In the October 2018 Budget, the Chancellor announced that the CDEI would be exploring the use of data in shaping people's online experiences. As part of its Review, the CDEI commissioned a landscape summary to provide an analysis of how online targeting works and what public opinion research has been conducted to date. This found that existing research was largely focused on online advertising, and contained fewer insights on other forms of online targeting. The landscape summary's authors also recommended that further research is needed to fully understand public attitudes towards the use of online targeting and nuanced 'trade-offs' between the benefits and harms it may cause.

To inform its review and recommendations to the government, the CDEI therefore needed to better understand public attitudes to online targeting. In particular, it sought to identify where the use of technology may be out of line with public values, and what the public consider to be the right balance of responsibility between people, companies and the government.

THE NEED FOR DIALOGUE

Given that public awareness of online targeting technology was low, a deliberative public dialogue approach was critical in enabling members of the public to develop informed views.

A key benefit of deliberative dialogue is the time spent with members of the public to discuss issues in detail. This allowed participants to develop their own thinking as they become more aware of the evidence, debates, processes and trade-offs that shape the current policy landscape relating to online targeting. The workshops were designed to capture public opinion at multiple points, as participants gradually became more informed.

Over the course of the dialogue, moderators used various techniques to help inform participants and to stimulate discussion. These included: plenary presentations; expert testimonies; demonstrations of online targeting; hypothetical case studies; talking heads (perspectives from different elements of the debate); visual mock ups to illustrate the potential look and feel of platform interventions; and the presence of industry specialists to act as expert witnesses during discussions. In addition, participants were given the choice of a paper or video diary to complete between events, to help capture experiences of online targeting in everyday life.

The dialogue process was developed with the support of Sciencewise and an Oversight Group comprised of academics, policy makers, consumer groups, data science institutes, and organisations involved in using online targeting.
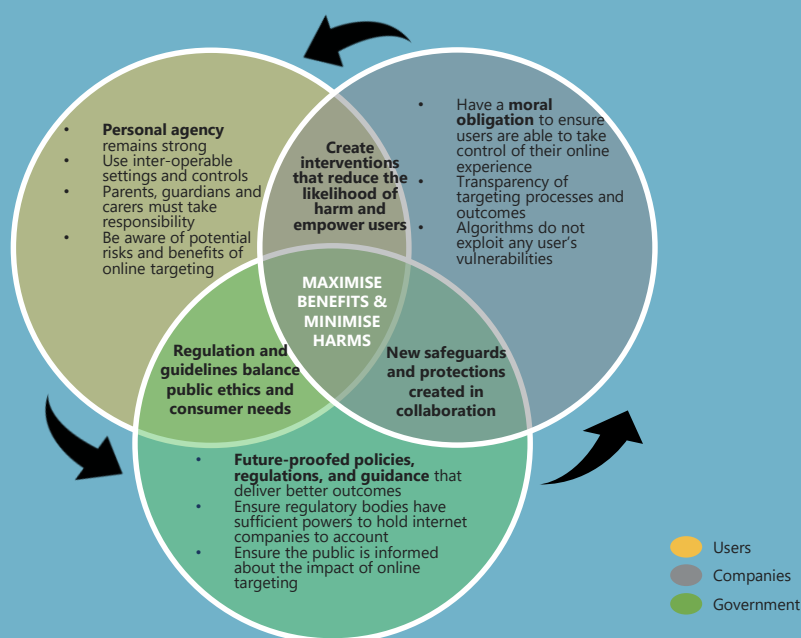
The dialogue engaged 147 participants aged 16+ in two days of discussion across seven locations in Great Britain over June-July 2019. 87 participants were recruited to form part of a heterogenous sample, reflective of the adult population. Four evening sessions were convened with 60 participants in specific groups of interest, including those aged 16-17, those with financial difficulties, member of ethic minority communities, and individuals with experience of mental health issues.

A small number of follow-up in-depth interviews were conducted to help explore a number of issues highlighted in the dialogue in more detail. **An online survey was also commissioned** to further supplement the analysis in specific areas.

OVERVIEW OF KEY FINDINGS

1. **Awareness** of online targeting was **limited**, with mixed lived experience

2. **Understanding** of technology that drives online targeting was **low**; with dialogue participants shocked at the sophistication with which it takes place

3. As a concept, **online targeting was seen to be a desirable feature** of using the internet. However, people's attitudes towards it were contingent on their **trust** in the organisation conducting online targeting, their support for the objectives of the targeting, and their acceptance of the way that data is being used

4. **User controls**, as currently configured, were not considered to work to help people shape their own preferences

5. The key perceived **benefit** of online targeting was the provision of **new and relevant information**, quickly and easily, to users

6. Perceived **harms** of online targeting

demonstrated a concern beyond issues of data protection Participants were most concerned that online targeting systems could exploit people's **vulnerabilities**, erode their **autonomy**, and amplify **inappropriate content**

7. Participants thought that **solutions** would need to involve action from **government**, **industry** and **users;** though many expected government to take the lead

8. Participants prioritised action to improve **transparency**, increase **accountability**, and **empower users** to take control of how they are targeted

9. They developed **nuanced views** through deliberation, and identified both practical and principled limits to the steps that should be taken to minimise harms. This was particularly true where they thought that actions to make online targeting systems safer might have a significantly negative impact on user experience or welfare.

Participants called for action from government, industry and users to improve transparency, increase accountability, and empower users.

- **Personal agency** remains strong
- Use inter-operable settings and controls
- Parents, guardians and carers must take responsibility
- Be aware of potential risks and benefits of online targeting

Create interventions that reduce the likelihood of harm and empower users

- Have a **moral obligation** to ensure users are able to take control of their online experience
- Transparency of targeting processes and outcomes
- Algorithms do not exploit any user's vulnerabilities

MAXIMISE BENEFITS & MINIMISE HARMS

Regulation and guidelines balance public ethics and consumer needs

New safeguards and protections created in collaboration

- **Future-proofed policies, regulations, and guidance** that deliver better outcomes
- Ensure regulatory bodies have sufficient powers to hold internet companies to account
- Ensure the public is informed about the impact of online targeting

🟡 Users
⬤ Companies
🟢 Government

![Ipsos]

THE VALUE OF DIALOGUE

The dialogue added significantly to the existing body of knowledge on attitudes towards online targeting.

The research reaffirmed previous evidence that suggests that the public have little or no understanding of the online targeting process, yet **offered a more rounded understanding of the extent to which the public feel** *uncomfortable* **with the idea of online targeting.** The dialogue research further illustrated a greater onus the need for change that than suggested by other research; and indicated that protection from harm was as important as protecting privacy.

Overall, it was clear that participants did see significant value in online targeting in both the private and public sector; however, almost all **participants advocated that some form of change** was required to improve the way in which online targeting currently operates.

Participants across the dialogue also acknowledged the challenges in delivering improved outcomes, and were clear that **no single actor bore sole responsibility** for minimising potential harms. Key priorities included; raising a greater level of awareness of online targeting; encouraging industry to do more to help empower and protect users; and establishing an appropriate mechanism for

scrutiny that ensures internet companies are working in the best interests of users.

The dialogue offers further insight into how an informed public trade-off some of the inherent tensions within the current online targeting system; and as such provides policy makers and wider stakeholders with guidance on how best to improve outcomes in other contexts.

For example:

- **Participants were clear that more should be done to protect vulnerabilities online**, and most were willing to consider some form of active monitoring of all users to proactively identify and support vulnerable users. **However, it was also clear that any action should proceed with caution and sensitivity**; this will likely require different approaches to different forms of vulnerability.

- **Participants were cautious about encouraging the removal of unreliable or inappropriate content** as a mechanism to protect users from harm, largely due to the limits it would impose on free access of content. As such, they felt down-weighting content and information cues through prompts or pop ups were **a more appropriate compromise**.
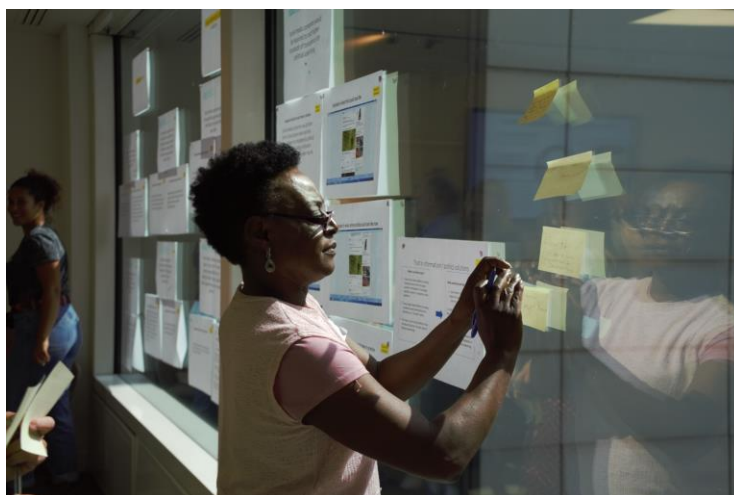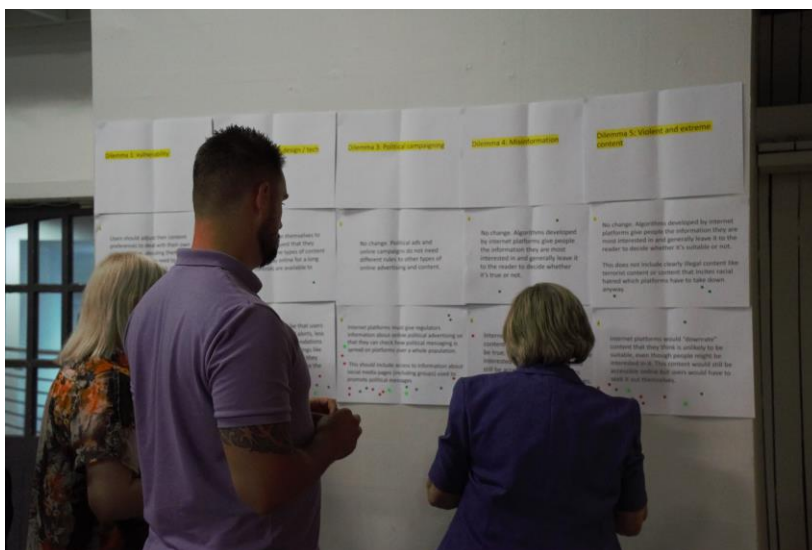
POLICY IMPACT

Findings from the research have been used to inform the CDEI's Review of Online Targeting, and the recommendations it makes to the government. Following the research, **the CDEI concluded that people do not want targeting to be stopped, but they do want online targeting systems to operate to higher standards of accountability and transparency, and to have meaningful control over how they are targeted.**

The CDEI's recommendations draw from this understanding of public attitudes, and support regulatory action that takes proportionate steps to achieve these goals. **They aim to support the development of a regulatory regime that promotes responsibility and transparency, and safeguards human rights by design.** They also aim to support regulators to anticipate and respond to changes in technology, and seek to guide its positive development to be better aligned with people's interests. Finally, they aim to meet public expectations for more meaningful control over how users are targeted online.

The CDEI has **made three sets of recommendations to enable the UK to realise the potential of online targeting, while minimising the risk.**

First, new regulation the government is planning to introduce should ensure that companies that operate online targeting systems are held to higher standards of **accountability**.

Second, the operation of online targeting should be more **transparent**, so that society can better understand the impacts of these systems and policy responses can be built on robust evidence.

Third, policy should seek to give people more **information** and **control** over the way they are targeted, so that such systems are better aligned to individual preferences."

The UK government will respond to the CDEI's recommendations publicly within six months. The full set of recommendations can be found in the Online Targeting Review full report can be found here.[1]

RECOMMENDATIONS TO GOVERNMENT

ACCOUNTABILITY

1. The government's new online harms regulator should be required to provide regulatory oversight of targeting:

   - The regulator should take a "systemic" approach, with a code of practice to set standards, and require online platforms to assess and explain the impacts of their systems.

   - To ensure compliance, the regulator needs information gathering powers. This should include the power to give independent experts secure access to platform data to undertake audits.

   - The regulator's duties should explicitly include protecting rights to freedom of expression and privacy.

   - Regulation of online targeting should encompass all types of content, including advertising.

   - The regulatory landscape should be coherent and efficient. The online harms regulator, ICO, and CMA should develop formal coordination mechanisms.

2. The government should develop a code for public sector use of online targeting to promote safe, trustworthy innovation in the delivery of personalised advice and support.

TRANSPARENCY

3. The regulator should have the power to require platforms to give independent researchers secure access to their data where this is needed for research of significant potential importance to public policy.

4. Platforms should be required to host publicly accessible archives for online political advertising, "opportunity" advertising (jobs, credit and housing), and adverts for age-restricted products.

5. The government should consider formal mechanisms for collaboration to tackle "coordinated inauthentic behaviour" on online platforms.

USER EMPOWERMENT

6. Regulation should encourage platforms to provide people with more information and control:

   - We support the CMA's proposed "Fairness by Design" duty on online platforms.

   - The government's plans for labels on online electoral adverts should make paid-for content easy to identify, and give users some basic information to show that the content they are seeing has been targeted at them.

   - Regulators should increase coordination of their digital literacy campaigns.

7. The emergence of "data intermediaries" could improve data governance and rebalance power towards users. Government and regulatory policy should support their development.

To find out more about online targeting policy please contact: policy@cdei.gov.uk

To find out more about public dialogue please contact: contactinfo@sciencewise.org.uk

To find out more about the research please contact: ipsoscommunications@ipsos.com