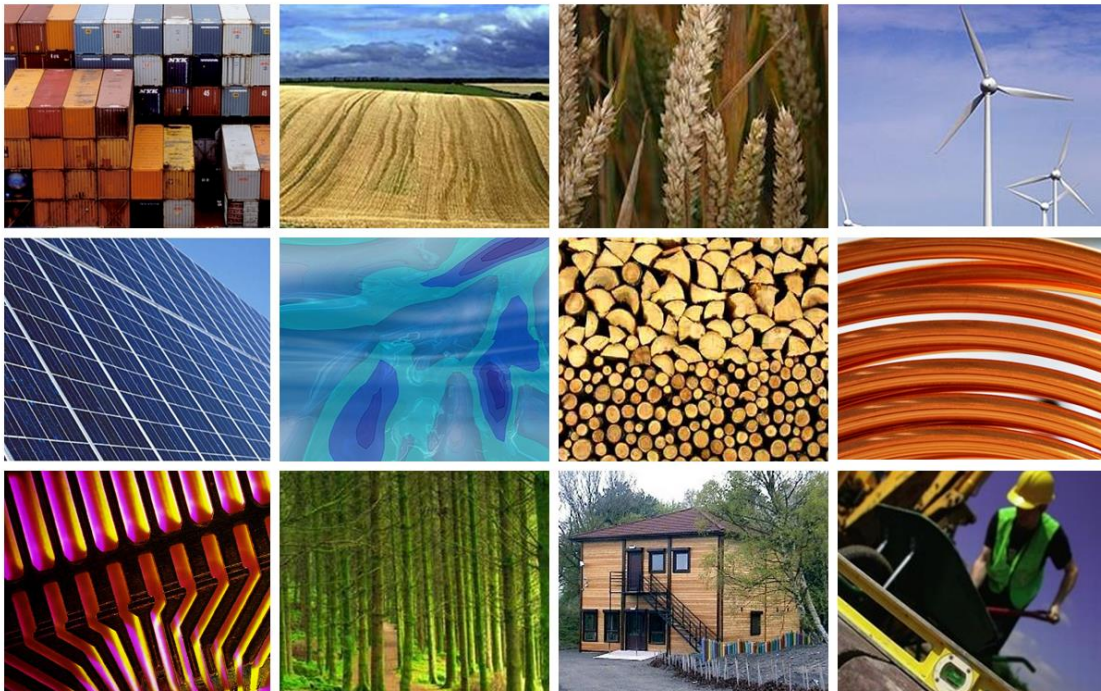


Centre for Data Ethics and Innovation and Sciencewise

## Public Dialogue on Online Targeting

Evaluation Report

March 2020



# Quality Management

URSUS Consulting Ltd has quality systems which have been assessed and approved to BS EN IS9001:2008 (certificate number GB2002687).

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## Glossary of Acronyms

BEIS	(Department of) Business, Energy and Industrial Strategy
BME	Black and Minority Ethnic
CDEI	Centre for Data Ethics and Innovation
CMA	Competition and Markets Authority
DA	Devolved Administration
DCMS	Department of Culture, Media and Sport
FTE	Full Time Equivalent
GDPR	General Data Protection Regulation
ICO	Information Commissioner's Office
oversight group	Oversight Group
PECR	Privacy and Electronic Communications Regulation
SEG	Socio economic group
UKRI	UK Research and Innovation

## EXECUTIVE SUMMARY

### Introduction

This independent evaluation report has been prepared by URSUS Consulting Ltd on behalf of Centre for Data Ethics and Innovation (CDEI) and Sciencewise<sup>1</sup>. It covers a public dialogue to understand attitudes to online targeting delivered on behalf of CDEI by Ipsos MORI.

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 rounds of deliberative workshops across seven locations in Great Britain over June-July 2019. In three locations (London, Tamworth and Cardiff) the participants broadly reflected the general population in that area: in four smaller workshops (Leeds, Southampton, Falkirk and Newcastle) groups brought together people from minority ethnic backgrounds, people who are or have been financially vulnerable, people who have experience of mental illness, and 16–18 year olds respectively. The dialogue process was designed to fit with CDEI's review of online targeting which also included a landscape review of the literature and stakeholder interviews, and a review of how online targeting is regulated in different contexts. The timeframe for the project was extended by the addition of a quantitative survey of 2,200 individuals to test some of the findings of the dialogue, and by events outside the control of the project, including the 2019 national election and Brexit.

### Objectives

The dialogue had the following four objectives:

1. To engage a diverse and inclusive sample of the public to explore attitudes towards:
  - online targeting practices;
  - the potential benefits and harms of these practices, particularly with regard to their impact on human autonomy (e.g. if they are manipulative), the trustworthiness of news and media content, and the protection of vulnerable people; and
  - the governance of these practices, including potential solutions that might facilitate beneficial uses and minimise harms.
2. To understand the values and principles underlying public attitudes towards online targeting of content, products and services.
3. To understand if, and how, attitudes vary in different contexts (through a range of case studies) and across different sub-groups of participants.
4. To explore participants' views on the trade-offs involved in online targeting in different contexts including commercial, public service delivery, content (e.g. news and political messaging).

### Framing of the design and delivery

The dialogue focused on online targeting (also referred to as personalisation or tailored online messaging) by internet companies (including platforms, content providers and digital advertisers) to users based on data about them or groups similar to them and their online behaviour. The dialogue was carefully framed to explore perceptions of both benefits and potential harms of online targeting to individuals – including those perceived to be more vulnerable – and to society at large. The four

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<sup>1</sup> Sciencewise is funded by UK Research and Innovation (UKRI). The Sciencewise programme aims to improve policy making involving science and technology across Government by increasing the effectiveness with which public dialogue is used and encouraging its wider use where appropriate to ensure public views are considered as part of the evidence base. It provides a wide range of information, advice, guidance and support services aimed at policy makers and all the different stakeholders involved in science and technology policy making, including the public. Sciencewise also provides co-funding to Government departments and agencies to develop and commission public dialogue activities.

subgroups with vulnerable people or those likely to hold markedly different views were added to the design on the basis of the literature review findings and on the advice of the oversight group.

### **Dialogue and Evaluation Methods**

The dialogue process was designed and delivered by Ipsos MORI between April 2019 and February 2020 and was steered by an oversight group with representation from the commissioners (CDEI and Sciencewise) and wider NGO, academic, industry and government stakeholders. The process also involved a stakeholder workshop with about a dozen participants. The public participants each attended two workshops: either Saturdays or weekday evenings two or three weeks apart. The workshops were supplemented with follow-up depth interviews with five individuals to explore their personal experiences and issues which had not surfaced automatically during the larger workshops.

The evaluation process ran throughout the dialogue and involved desk review, observation of events (a stakeholder workshop and eight out of 14 dialogue workshops), analysis of participant and specialist feedback questionnaires from all workshops, reviews of a number of iterations of the findings and draft dialogue report and one to one interviews with 10 individuals drawn from the oversight group, commissioners and the contractors.

### **Project governance and management**

A medium-sized fully representative oversight group brought together representatives of the internet industry, regulators and data and ethics think tanks and NGOs. During the early stage members made a real impact in ensuring potentially vulnerable subgroups were included and that the information and language were balanced and accurate. The group became less engaged as the project timeline was extended into late 2019/early 2020. Interviews with oversight group members suggested that they would have appreciated being kept informed about additional research elements, publication dates and how members could help disseminate the findings to different audiences.

### **Key Evaluation Findings**

#### **Meeting the objectives**

Three of the four objectives were fully met and the fourth was substantially met. The dialogue successfully engaged a diverse and inclusive sample of the public to explore attitudes towards online targeting practices, the potential benefits and harms of these practices and the protection of vulnerable people and the governance of these practices, including potential solutions that might facilitate beneficial uses and minimise harms (Objective 1). The design also helped to explore the values and principles underlying public attitudes towards online targeting of content, products and services (Objective 2). Evaluation interviewees agreed that this added real value in addressing current gaps in the literature.

A set of pen portrait case studies helped deepen current understanding of attitudes in a wide range of previously unexplored contexts/applications. The dialogue also tried to understand views of different subgroups (16-18-year olds, BME communities, and those with mental health or financial vulnerability issues). However, the views of these groups did not emerge as markedly different from those in the larger groups. Almost all participants tended to view other people, and not themselves, as particularly vulnerable to potential harms of online targeting (Objective 3).

The deliberations and follow up quantitative polling also helped to understand participants' views on the trade-offs involved in proposed solutions to online targeting in different contexts including commercial, public service delivery and content (e.g. news and political messaging) and highlighted participants preference for change and more control, but without giving up too many of the perceived

benefits of personalisation (Objective 4). Participants identified roles for government, internet companies and themselves in implementing such solutions.

### **Policy and research impacts**

The public dialogue has been an important component of CDEI's review on online targeting. The dialogue findings strongly underpin CDEI's first set of recommendations to government, published in February 2020. The findings are expected to resonate with a number of different online data collection, analysis and use policymaking processes including the Department of Culture Media and Sport's (DCMS) Online Harms Bill and the Competition and Markets Authority (CMA) review of digital advertising. CDEI's activities to share the findings and their own recommendations with international, European and UK government and organisations mean that the potential impacts on policy and research could be far-reaching. Even if not all the recommendations are accepted by government and industry, the research is widely considered to have filled some gaps in the current literature and is likely to inform future research on potential harms to vulnerable individuals and proposed Codes of Conduct for the internet industry.

### **Satisfaction with the process**

By the end of the first round of workshops participants reported that they had really enjoyed the sessions and almost everybody agreed that they had learnt a lot about online personalisation and algorithms. Many described the day as interesting and enjoyable, but also eye-opening, thought-provoking, enlightening and even terrifying. By the end of the second round of workshops all but a small minority (5%) felt they either now knew a lot, or a fair amount, about the different benefits, harms and potential solutions to achieving the changes they wanted to see in how online targeting works. Almost all participants really enjoyed taking part, felt that public involvement in such discussions was important, and felt confident that CDEI would take their views into account in drawing up its recommendations to government. The vast majority of participants would be happy to get involved in such public dialogue again in the future.

### **Meeting Sciencewise best practice in design and delivery**

An experienced contractor was able to deliver a well-designed set of workshops whose structure worked well for both large and small groups of participants. The design was balanced in terms of covering both benefits and harms, in exploring both personal and societal impacts. Despite the very wide framing of the topic and the ambition to cover many different applications and potential solutions, the process and material design managed to convey enough information for the participants to feel informed to deliberate on the issues and potential solutions without overwhelming them.

A large and experienced facilitation team were able to keep the discussions on track, ensure that almost everyone contributed actively over the two days and that participants felt that their voices had been heard.

Specialists, commissioners and OG members also described themselves as very satisfied with the overall process and the contribution that outputs (report, non-technical summary, vox pop videos, slide deck for policy briefings and stimulus materials) would make to the policy and research landscape.

### **Costs and Potential Benefits**

The financial budget, including the independent valuation and an extension to cover a follow quantitative survey was about £236.7k of which Sciencewise contributed 59% and CDEI contributed the remainder. In addition, CDEI, oversight group members and stakeholders invested an estimated additional £100k of time in-kind.



It is too early to identify and value the economic benefits of the public dialogue, but the benefits could vastly outweigh the costs if CDEI's recommendations are taken onboard by DCMS and other government departments in shaping their proposals for proportionate regulation. In addition, recommendations which are taken on board by the internet industry to develop their own Codes of Conduct and to empower users to take control of their own privacy settings or online advertising preferences could help to reduce the costs of regulation.

### Key lessons learnt on design and delivery

- **Literature review.** A commissioner-led review worked well to help frame the dialogue and ensure the design addressed current gaps in knowledge positioning the commissioners to lead in developing technical content while allowing contractors more time for process design and producing accessible stimulus materials. Ideally commissioner-led reviews should be completed before the inception stage.
- **Oversight group.** In future, Sciencewise could guide commissioners on setting the expectation that oversight group members will fully participate in dialogue workshops. It can also advise on how to keep members engaged over an extended project lifetime, and how to maximise policy and research impacts by agreeing dissemination roles.
- **Subgroups with vulnerable people or those likely to have markedly different opinions were a particular strength of this dialogue.** Where subgroups are included in future designs the commissioners and contractors should consider whether tailoring workshop design and the stimulus materials for specific subgroups could yield richer findings and help surface more examples of lived experience.
- **Mix of techniques and materials.** Where the breadth of a dialogue means that participants have to work through a large number of applications or solutions then it is important that contractors try to use a mix of different approaches so that exercises do not become repetitive and participants do not become disengaged.
- **Challenges in getting specialist representation at all workshops were well anticipated and planned for** through a combination of pre-recorded talking heads videos, handouts and the presence of the commissioners or close collaborators at almost all events. Guidance from Sciencewise on how best to address these challenges would be useful for future public dialogues.
- **Institutionalising the experience of running public dialogues in the commissioning body.** In order to ensure lessons learnt are embedded in commissioning organisations it would be helpful to run an internal 'wash-up' session. This process could be supported by the independent evaluator if required.
- **Ongoing involvement of informed participants.** Many participants reported they would be happy to continue being involved and gave permission to be re-contacted. This pool of informed and willing members of the public is a resource that commissioners could go back to as a standing panel/sounding board for testing future policy and research recommendations.

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**Annex A: Oversight Group Members and stakeholders engaged**

**Annex B: Public participant feedback Days 1 and 2**

## 1. INTRODUCTION

This report has been prepared by URSUS Consulting Ltd and presents the findings of the evaluation of a public dialogue on online targeting designed and delivered on behalf of the Centre for Data Ethics and Innovation (CDEI) and Sciencewise<sup>2</sup> by Ipsos MORI.

### 1.1 BACKGROUND CONTEXT

CDEI was set up as an independent body in late 2018 to advise the UK Government about law and policy regarding new data driven technologies. One of CDEI's first tasks has been to undertake a review of online targeting approaches. This has involved a number of strands of activity including: an academic literature review on how online targeting works and the potential benefits and harms in different settings; a review of how current regulatory mechanisms are able to deliver their intended outcomes and what technical, legal or other mechanisms could help ensure that the use of online targeting is consistent with the law and public values; and public engagement.

CDEI, supported by Sciencewise, commissioned Ipsos MORI to design and deliver a public dialogue with 150 members of the public to examine where the use of technology is out of line with public values, and what is the right balance of responsibility between individuals, companies and the government. The public dialogue involved a series of three large and four small group workshops with members of the public. Each group was reconvened once. The workshops were supplemented with a handful of follow-up depth interviews (five) and a short quantitative survey (with 2,200 members of the public).

### 1.2 DIALOGUE OBJECTIVES

The dialogue process initially had six major objectives as follows:

- To support the CDEI to deliver robust recommendations - informed by public perspectives - about the potential for uses of online targeting and personalisation techniques to bring about harms and benefits, and how they should be addressed.
- To engage a diverse and inclusive sample of publics to explore attitudes towards:
  - online targeting and personalisation practices;
  - the potential benefits and harms of these practices, particularly with regard to their impact on human autonomy (e.g. if they are manipulative), the trustworthiness of news and media content, and the protection of vulnerable people;
  - the governance of these practices, including potential solutions that might facilitate beneficial uses and minimise harms.
- To understand the values and principles underlying public attitudes towards online targeting and personalisation of content, products and services.
- To understand if and how attitudes vary:
  - in different contexts (through a range of case studies);
  - across different subgroups of participants.

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<sup>2</sup> Sciencewise is funded by UK Research and Innovation (UKRI). The Sciencewise programme aims to improve policy making involving science and technology across Government by increasing the effectiveness with which public dialogue is used and encouraging its wider use where appropriate to ensure public views are considered as part of the evidence base. It provides a wide range of information, advice, guidance and support services aimed at policy makers and all the different stakeholders involved in science and technology policy making, including the public. Sciencewise also provides co-funding to Government departments and agencies to develop and commission public dialogue activities.

- To explore participants' views on the trade-offs involved in online targeting and personalisation in different contexts including commercial, public service delivery, content (e.g. news and political messaging).
- To demonstrate that the CDEI's outputs are informed by the public's views and expectations.

During the scoping stage the first and last were dropped specifically as objectives but retained as overarching aims for the public dialogue against which the impacts of the dialogue have been measured. The overall big question that public participants were asked to help address was:

*"How do the techniques used by organisations to direct information, products and services to you online affect your life and your community – and what could be done to improve them and the way they work?"*

CDEI is committed to engaging with the public in its future work and the findings from the public dialogue and this evaluation of what has worked well, and what less so will feed into CDEI's future programme.

### **1.3 FRAMING OF THE DIALOGUE**

Online targeting centres around the customisation of products and services online including content, services standards and prices. Online targeting uses a range of data about individuals (or about others who are like them) and algorithms based on their online behaviours and preferences in order to customise messages, content or services which are expected to be of interest to them. Online targeting is widely used in digital advertising and by recommendation engines and content ranking systems.

The scope of this public dialogue has been very broad covering 'internet companies' including online platforms (search engines, social media platforms, news sites, video and music sharing platforms, and e-commerce platforms) and online advertising companies and those involved in the ad tech sector.

The expected benefits of online targeting are that people are able to access online products and services, quicker, easier and more cheaply than if there was no targeting. However, online targeting may also result in harms to individuals, groups or society at large. The framing of the dialogue was designed to help explore how far the public is aware of, and comfortable with, the use of their personal data and the use of artificial intelligence (AI) to deliver potential benefits. The CDEI and non-industry stakeholders were also keen to explore how online targeting could potentially undermine:

- Vulnerable people by picking up indicators of their mood or mental health or financial vulnerabilities and so increasing their tendencies to engage in risky behaviours;
- Autonomy by making assumptions about an individual's motivations, behaviours and psychology which can then inform targeted content optimised to unduly influence their behaviour;
- The trustworthiness of media and advertising content, for instance, through targeting of very specific content (including news stories and political messaging) to micro-audiences with limited transparency; and
- The protection of privacy and data, for instance through very broad consent mechanisms, long and dense terms and conditions and lack of transparency over how data is being collected, processed and shared.

CDEI's literature review, which was completed during the scoping phase of the project, summarised the current evidence landscape on how online targeting works, what the public understands and feels about it, the potential benefits and harms to different groups (commercial, individuals and society) and options for remedies. The review highlighted the complex nature and very fast-moving technology in the sector, the extensive financial benefits to commercial actors and the short-term benefits of convenience and cost savings to individuals. However, the review also highlighted potential harms for individuals through online targeting in different contexts, particularly through the blurring of legitimate and illegitimate influencing or manipulation. The potential benefits and long-term cumulative harms to society as a whole were less well covered by the literature.

The literature review also identified a number of factors which have helped to frame the dialogue design and coverage including:

- Significant differences in attitude towards online targeting based on age, with more positive attitudes amongst younger users and more scepticism amongst older age groups.
- The limited evidence on how awareness of and attitudes to online targeting vary across social groups and demographic categories.
- The inverse correlation between people's growing awareness and understanding of online targeting techniques and their comfort with its use.
- That trust in online providers and authority in different contexts is a key factor in people's comfort with and acceptance of online targeting.
- The limited knowledge about how the public feels about online targeting in relation to addictive products, extreme content, micro-targeting of political adverts and for public health messaging.

The literature review and discussions with stakeholders helped to identify the need to discuss potential benefits and harms in different contexts (through case studies) and to understand the impacts on specific vulnerable groups. 'Vulnerability' became a central theme to explore both through projective scenarios of different contexts/applications and through special interest subgroups.

The original design (of large 50-person workshops in three locations across England) was modified to include three generic groups (of 30 participants each) and four smaller special interest subgroups (12-20 participants each). Adding the subgroups was intended both to give wider geographic coverage and to provide safe spaces for involving those with specific vulnerabilities, or who the literature suggested might have substantially different views on online targeting. Each of the four subgroups recruited individuals with shared characteristics (either age, ethnicity, financial or mental health vulnerability) in the hope they would feel comfortable sharing their lived experience, while being supported by specialist facilitators in smaller groups. Each subgroup followed a similar format to the larger groups, but in about half the time, with the intention that research findings would be easily compared and contrasted across groups. Each subgroup was expected to be slightly tailored in terms of style and facilitation needs. The four agreed subgroups are shown in *Box 1.1*.

Industry stakeholders suggested that the terms 'personalisation' or 'tailoring' should be used with members of the public in preference to online targeting, which was considered a more negative term. Personalisation was therefore used in most presentations and stimulus materials during the public workshops, although both participants and specialists also talked about online targeting. Since online targeting is the term most frequently used in the policy and research context, the final public dialogue report and CDEI's review both use this terminology.

### Box 1.1 Special interest subgroups

- **Young People (16-18 - Newcastle).** While some oversight group members and stakeholders would have liked to see even younger children included, it was agreed that a subgroup of 16-18-year olds could help to surface issues around how personalisation may affect choices, self-image and socialisation at a formative stage in young peoples' lives. The 16-year old cut-off age would mean that the same workshop design and materials could be used and there would be no risk of duplicating work already underway in other parts of government. A group of younger people was convened in Newcastle. It was agreed that younger voices could also be brought into the generic workshops through pen portrait scenarios focusing on younger people and by ensuring recruitment of a good sample of parents of younger children.
- **Black and Minority Ethnic groups (BME - Leeds).** The core delivery team's experience of previous public dialogues on data issues and discussions with a CDEI Board member highlighted the likelihood that ethnicity and religion might shape participant's views of potential harms - including scope for discrimination and bias - through online targeting. The project management team therefore agreed that convening a subgroup in Leeds could help provide insight into participant views and hear about any lived experience of online discrimination from both Afro-Caribbean and Asian communities. In addition, the generic and other subgroups were expected to include quotas for ethnicity reflective of the demographic profile of each area.
- **Financially vulnerable people (Southampton).** A number of oversight group members and stakeholders highlighted the specific harms that might face those suffering short or long-term financial vulnerabilities (e.g. due to socio-economic factors, health or psychological conditions such as gambling or shopping addiction). It was agreed that a small group of those with a high debt-to-income ratio would allow participants to feel comfortable discussing their vulnerabilities surrounded by others in a similar situation. Financial vulnerability was also introduced across all workshops through pen portrait scenarios of those in financially vulnerable situations.
- **Those suffering (or who have suffered) from mental health issues (Falkirk).** The literature highlighted the potential harms to those suffering from both short and long-term mental health issues such as low self-esteem, anxiety, depression, eating disorders and addictions. It was agreed that convening a group of people with such conditions through mental health charities would help to create a safe environment in which people were comfortable to talk about both potential harms but also opportunities for using personalisation to support vulnerable individuals (e.g. by targeting appropriate 'nudge' messaging, by recommending support services and groups, and even by alerting emergency services if they detected manic or risky behaviour). These issues were also explored in all the other workshops through pen portrait scenarios focused on people in these contexts.

### 1.4 LAYOUT OF THE REPORT

- **Section 2** describes the methods for the dialogue delivery and the evaluation;
- **Section 3** describes impacts (to date and anticipated) on online targeting policy and research;
- **Section 4** assesses the governance and management arrangements for the project;
- **Section 5** assesses how far the dialogue has met its objectives;
- **Section 6** describes how far the dialogue has met Sciencewise best practice standards for design and delivery;
- **Section 7** describes overall satisfaction with the process by participants and its impact on them;
- **Section 8** compares the financial and in-kind costs and potential economic benefits of the dialogue;
- **Section 9** summarises lessons learnt for the CDEI and Sciencewise.

## **2. METHODOLOGY**

This section describes the methodology for the dialogue delivery (Section 2.1) and for the evaluation (Section 2.2).

**The dialogue process was designed and delivered by Ipsos MORI between April 2019 and February 2020 and was steered by an Oversight Group with representation from the commissioners (CDEI and Sciencewise) and wider stakeholders. The process was informed by a separate landscape literature review commissioned by CDEI and involved a stakeholder workshop with about a dozen participants and dialogue workshops with some 147 participants across seven locations in the UK. Each group attended two workshops: either Saturdays or weekday evenings two or three weeks apart. The workshops were supplemented with follow-up depth interviews with five individuals and a short quantitative survey with 2,200 participants to further test some of the dialogue findings.**

### **2.1 PUBLIC DIALOGUE METHODS**

#### **2.1.1 Setting up the Oversight Group**

CDEI convened an Oversight Group of 10 members, chaired by CDEI. The group included representatives of government, academia and think tanks, Non-Governmental Organisations (NGOs) and online business sector associations. The oversight group was tasked with advising on the overall framing of the project, helping to inform and shape the dialogue design and ensuring that the dialogue was far-reaching, accessible, involved all relevant stakeholder groups and an appropriately selected sample of public participants. The oversight group was also tasked with commenting on: the CDEI's landscape; stimulus materials (ensuring they were balanced and accessible to a lay audience; outputs from the dialogue exercises; and the draft final report. They were also invited to help disseminate the findings of the research. The group met three times over the course of the dialogues. The oversight group membership is shown at **Annex A**.

#### **2.1.2 Core management team**

The core management team comprised a 3-4 person CDEI team, the Ipsos MORI project director and manager, the Sciencewise expert adviser, independent evaluator and a representative of UKRI. For most of the project duration the team met for a 30-minute weekly telephone progress call and Ipsos MORI shared regular short progress reports.

#### **2.1.3 Stakeholder engagement**

Ipsos MORI organised and facilitated a stakeholder meeting attended by about a dozen individuals. Stakeholders included commercial online businesses (including platforms, advertisers and content providers such as Facebook, Sprock and GrapM), institutes (Ada Lovelace), government organisations (Ofcom) and NGOs with interests in data protection, security and support of vulnerable groups (e.g. Open Data Initiative, Privacy International, GambleAware, Money and Mental Health and 5Rights). Ipsos MORI and CDEI shared the findings of the landscape literature review, the objectives for the dialogue and the proposed design including coverage of special interest groups.

### 2.1.4 Process design and stimulus materials

The core team worked together to design the workshop format and stimulus materials, with CDEI leading on content and Ipsos MORI on presentation. Materials were shared for several rounds of comment within the core group.

The two days of workshops incorporated a range of materials (as summarised in *Table 2.1*) including PowerPoint presentations, talking heads videos, 14 pen portrait scenarios of personalisation in different contexts, talking heads quotes and a set of potential solutions, demonstrating different approaches to minimising harms.

**Table 2.1: Design, tools and materials for public dialogue workshops**

Day 1 Morning/ first half	Day 2 Morning/first half
<ul style="list-style-type: none"><li>• Welcome, housekeeping, introductions and objectives for the day.</li><li>• Small table discussions – self-discovery of views of online user experiences.</li><li>• Small table discussions - Initial awareness and understanding of online targeting and design in small groups of an online service or product that they would find attractive.</li><li>• PowerPoint presentation by Ipsos MORI on what personalisation is, how it works, how it differs from conventional targeting, and how different data/browsing preferences lead to different adverts and recommendations.</li><li>• Talking heads video from specialists giving views on benefits.</li><li>• Reflections from plenary presentation.</li><li>• Washing line – participants placed themselves in a line according to how they felt about personalisation from very appealing to very concerning.</li></ul>	<ul style="list-style-type: none"><li>• Welcome back and Re-cap from day 1.</li><li>• Small table reflections from paper/video diary tasks.</li><li>• Small table discussion revisiting Day 1 pen portraits to explore who should take responsibility for minimising harms, and what provisions should be in place.</li><li>• PowerPoint presentation outlining the current systems/regulations in place to mitigate against harms.</li><li>• Introduction of ‘Talking heads’ – presenting different perspectives from a range of stakeholders on which actors should have more/less responsibility.</li><li>• Small group discussions around reaction to ‘Talking heads’ perspectives.</li></ul>
Afternoon/second half	Afternoon/second half
<ul style="list-style-type: none"><li>• Introduction of hypothetical pen portraits of how personalisation might work in different contexts.</li><li>• Small table work on a sub-set of scenarios over several sessions so that each pen portrait was considered by at least two groups.</li><li>• Talking heads video from specialists giving views on potential harms.</li><li>• Table discussion to review tensions and trade-offs between benefits and harms, and the appetite for change.</li><li>• Washing line revisited.</li><li>• Briefing on paper and video diary homework.</li><li>• Evaluation feedback forms.</li></ul>	<ul style="list-style-type: none"><li>• Introduction of hypothetical practical solutions to minimise harms.</li><li>• Small table work across several sessions on a sub-set of solutions to ensure that each was discussed by at least two groups.</li><li>• Reflection as a small group, and then in plenary, to identify the most appropriate solutions.</li><li>• Close and reflections from CDEI on what they had heard and learnt.</li><li>• Evaluation feedback forms.</li></ul>

The materials for the first event were designed to gradually introduce participants to the topic of online targeting, what this might look like in practice in their day-to-day online experiences and to explore through case studies what benefits/harms might be associated with this. Participants were expected to come away from the workshop with a greater understanding of online targeting and to have started thinking about what measures could be introduced to maximise benefits and mitigate harms. Participants were also asked to carry out a homework task in the three weeks between workshops. This included paper diaries for most participants and video diaries for 30 participants. Those who volunteered to take part in the video diary downloaded a LifeApp which allowed them to be kept informed of tasks and upload videos. The app was used for data tagging and transcription.



The design and materials for the second round of workshops were designed to deepen participant's understanding of how online targeting is currently regulated, to explore whether they were happy with the protections afforded and, if not, what they would like to see done about it and whose responsibility they felt this should be. The pen portraits from day one were reintroduced in the morning so that participants could think about potential changes in a familiar context. The afternoon sessions focused on exploring potential solutions presented as practical examples. These were designed to explore trade-offs in specific contexts and highlight general principles and any potential redlines. The special interest subgroups followed the same format as the full day events, but in much smaller groups were expected to cover the same materials in half the time.

The design and materials were piloted by Ipsos MORI with CDEI observing during the week before each event, allowing minor amends to language and clarifications.

### 2.1.5 Participant recruitment

The seven locations were chosen to include two of the devolved administrations (Wales and Scotland) and a mix of big cities and smaller towns which would allow recruitment of a mix of urban, suburban and rural residents. The three generic workshops (London, Tamworth and Cardiff) ran for a full Saturday (six hours) in June and were reconvened on another full Saturday in July. The special interest subgroups were held on weekday evenings (three hours) and reconvened 2-3 weeks later. Recruitment was on-street for the general groups and using a combination of on-street, through charities and snowballing for the special interest subgroups. Participants were paid a total incentive of up to £260 for those taking part in the video diaries. Payments were in two tranches, with a smaller payment after workshop one in order to encourage them to attend the second event.

**Table 2.2: Locations and dates of public dialogue workshops**

Location	Dates	Type of group and target number	No of attendees (and feedback forms collected)
London – general	June 22 <sup>nd</sup> – full day	30 participants each	31 participants (30 feedback forms)
	July 13 <sup>th</sup> – full day	reflective of age, gender, ethnicity, socio-economic groups (SEGs) and attitudes to technology	30
Tamworth – general	June 29 <sup>th</sup> – full day		30 participants (29 feedback forms)
	July 20 <sup>th</sup> – full day		24
Cardiff, Wales – general	June 29 <sup>th</sup> – full day		27
	July 20 <sup>th</sup> – full day		26
Newcastle - 16-18-year olds	July 3 <sup>rd</sup> – evening	15 with mix of gender and ethnicity reflective of area	17
	July 23 <sup>rd</sup> – evening		16
Southampton - financially vulnerable	July 4 <sup>th</sup> - evening	15 * 18-75-year olds with mix of gender and ethnicity reflective of area	16 (15 feedback forms)
	July 24 <sup>th</sup> – evening		
Leeds/Bradford - Black and minority ethnic (BME)	July 8 <sup>th</sup> – evening	15 * Afro Caribbean and Asian with gender and age mix reflective of area	14 (13 feedback forms)
	July 29 <sup>th</sup> – evening		14
Falkirk, Scotland (those with mental health issues)	July 9 <sup>th</sup> - evening	10-15 * 18-60-year olds with gender and ethnicity mix reflective of the area	13
	July 30 <sup>th</sup> – evening		10

### 2.1.6 Follow on interviews

In order to further explore the views of dialogue participants who may have had lived experience of the potential ills of online targeting but were not comfortable in sharing this in the public meetings, Ipsos MORI approached 20 individuals who had given permissions to be re-contacted. This resulted in five in-depth telephone interviews from across the seven locations undertaken in autumn 2019. Each interview lasted one hour and discussed individual's experience of vulnerability and tried to explore issues such as discrimination and bias associated with algorithms which had not spontaneously arisen much in the public workshops. The findings from the interviews were incorporated as text boxes in the final report.

### 2.1.7 Online survey

Based on the findings from the public dialogue, CDEI also commissioned Ipsos MORI to carry out a follow up survey to test qualitative findings. Two waves of online survey research were conducted in December 2019 and January 2020, with a sample of c2,200 adults living in Britain and aged 16-75. The design of the survey drew on the experience of the public dialogue to ensure the content was meaningful and accessible. The survey asked 20 questions focused around:

- Expectations of the type of information used in online targeting;
- Levels of acceptability in different forms of online targeting, within the private and public sectors;
- Levels of trust in organisations to conduct online targeting in a responsible way;
- Experience of accessing and changing settings and preferences relating to online targeting; and
- Perceived impact of online targeting on purchasing decisions and voting intentions.

The data was weighted to be representative of gender, age, region and working status. The findings were used to supplement findings from the in-depth research in the final dialogue report.

### 2.1.8 Analysis and reporting

For each of the workshops all substantive discussions in plenary and at small tables were recorded by a simultaneous note-taker (one per table) and with audio recording for back-up. A filmmaker also attended a sample of workshops and recorded vox pop interviews with participants. The transcribed notes from the 14 sessions were analysed manually by the core Ipsos MORI team around an agreed set of themes and a report structure agreed with CDEI at an internal workshop.

The published outputs from the public dialogue process included:

- [A final report](#) (including [annexes](#) with workshop discussion flows, stimulus materials and results of the quantitative survey) and an [executive summary](#) (7-8 pages);
- [A 6-page non-technical summary](#) highlighting why public dialogue was used, the high-level findings and CDEI's policy recommendations to government;
- A slide deck of findings for policy briefings;
- A short (40 sec) video describing the purpose and process of the public dialogue; and
- A 3-4-minute video describing participant views and journeys based on the vox pops and recordings from participants' video diaries.

## 2.2 EVALUATION APPROACH

The evaluation took place between April 2019 and February 2020. The objectives were the following:

- To gather and present objective and robust evidence of the nature and quality of the impacts, achievements and activities of the project in order to come to conclusions; and
- To identify lessons from the project to support the design and delivery of future public dialogue projects.

Evaluation tasks were undertaken in three phases as follows:

- **Phase 1: Baseline Assessment.** Working alongside the delivery team to ensure that research framing and the overall process design reflected what was already known about public understanding and attitudes to online targeting and that the framing reflected the expectations of the Oversight Group and stakeholders. Formative inputs were provided to the core team on workshop design, recruitment of participants and the development of stimulus materials through a short inception report and regular weekly progress calls.
- **Phase 2: Interim assessment of design and delivery.** Evidence was collected from participants, specialists and observers taking part in the 14 dialogue workshops in seven locations. We observed eight workshops and Ipsos MORI kindly collected feedback evaluation forms at meetings we were unable to attend. Evidence was collected through questionnaires and informal interviews during the events: findings were fed back to the core team immediately after events and to the oversight group through a brief interim report.
- **Phase 3: Final assessment of the project overall.** Summative evaluation of the project was based on quantitative data collated during phases one and two and qualitative data collected during phase three. This included 10 semi-structured interviews with stakeholders who had been involved with the process (as members of the oversight group or specialists) the CDEI team, Ipsos MORI and Sciencewise.

Data from the different sources used in the report is highlighted with the following icons:

- 🗳️ Formal questionnaires completed by participants across the seven locations and quotes from participant's homework, vox pops and informal interviews with the evaluators;
- 🧠 Specialist and stakeholder feedback from post-event questionnaires and informal discussions;
- 👤 One to one interviews with stakeholders; and
- 👁️ Evaluator observation at meetings, events and workshops and independent assessment.

### 3. IMPACTS

This section assesses the impacts of the dialogue process on policy, practice and research based on interviews with CDEI and selected oversight group members and stakeholders and evidence of dissemination and use of dialogue outputs by industry and policy makers. This section is arranged as follows:

- Section 3.1 summarises activities to disseminate and communicate the findings of the dialogue;
- Section 3.2 summarises the potential impacts on online data collection, use and targeting policy;
- Section 3.3. describes impacts on other research agendas; and
- Section 3.4 summarises other wider impacts.

**The evaluation has found that the public dialogue and its associated research have been an important component of CDEI’s review on online targeting. The dialogue findings strongly underpin CDEI’s first set of recommendations to government, published in February 2020. The findings are expected to resonate with a number of different online data collection and use policy making processes including the Department of Culture Media and Sport’s (DCMS) Online Harms Bill and the Competition and Markets Authority (CMA) Review of Digital Advertising. CDEI’s activities to share the findings and their recommendations with international, European and UK governments and organisations mean that the potential impacts of the dialogue on policy and research could be far-reaching. Even if not all the recommendations are accepted by the UK Government and internet industry, the research is widely considered to have filled some gaps in understanding in the current literature, including rich understanding of public attitudes to a much wider range of online targeting applications, and perceptions of how potential harms may impact on vulnerable individuals and groups.**

#### 3.1 DISSEMINATION ACTIVITIES TO DATE

CDEI had planned to publish its final report into online targeting in December 2019, but due to delays resulting from the election, the addition of the quantitative survey element and Brexit, the final dialogue report and CDEI review <sup>3</sup> were published together on 4<sup>th</sup> February 2020. The final chapter of the CDEI review summarises the findings of the dialogue and the research is referred to throughout the report. The recommendations draw heavily on the public dialogue and supporting quantitative survey.

Both the CDEI review and dialogue report were shared at a launch event on 4th February attended by about 50 individuals from industry/trade associations, regulators, government, civil society and think tanks. CDEI presented its findings and recommendations followed by a Q&A session.

In the few weeks since publication the CDEI Chair and staff have presented the findings, including those from the public dialogue, to a wide range of international and UK audiences as summarised in *Table 3.1*.

The launch of CDEI’s report and the public dialogue report also generated considerable interest from international, national and regional media, trade/tech and government-related press as summarised in *Table 3.2*. There have also been significant social media engagements, including amongst stakeholders who took part in the dialogue process, such as 5Rights Foundation and Tech UK.

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<sup>3</sup> [www.gov.uk/government/publications/cdei-review-of-online-targeting](https://www.gov.uk/government/publications/cdei-review-of-online-targeting)

**Table 3.1: CDEI dissemination of dialogue findings and its recommendations since publication**

Region	CDEI Dissemination of dialogue findings and its recommendations
<b>Completed events (by 21/2/2020)</b>	
<b>International</b>	The Freedom Online Coalition (annual meeting in Ghana)
<b>US</b>	More than 27 individual audiences including academics, policymakers, civil society and city governments in Washington, New York and Boston.
<b>Europe</b>	Amsterdam University and the Personalised Communication Unit (an internationally influential group working on online data and ethics)
<b>UK</b>	All Party Parliamentary Group on Data Analytics
	UK Regulators Network big meeting on vulnerability
<b>Planned events</b>	
<b>Europe</b>	The European Commission
<b>UK government</b>	Ofcom workshop
	Department of Culture Media and Sport (DCMS) meetings with three internal teams
	Cabinet Office
	Parliamentary Internet, Communications and Technology Forum (PICTFOR) internet group
	Oral evidence from the CDEI Chair to the Select Committee on Democracy and Digital Technologies
<b>UK trade and innovation</b>	Presentation to the Data and Marketing Association (DMA) Data 2020 event in late February
	Data Justice Conference, Cardiff, May 2020
	Presentation to a Nesta event in late February

**Table 3.2: Examples of media coverage of CDEI's online targeting review**

Type of Media	Media outlet
<b>International media coverage</b>	CNBC
<b>National media coverage</b>	<b>Print</b> <ul style="list-style-type: none"> <li>○ Guardian</li> <li>○ The Telegraph - both print and online, as well as an op-ed written by Roger Taylor</li> <li>○ The Times – print and opinion piece by Jonathan Evans welcoming the CDEI's Targeting Review and urging AI to meet ethical standards</li> <li>○ The Sun</li> </ul>
	<b>TV</b> <ul style="list-style-type: none"> <li>● ITV, City A.M., Yahoo UK News and BBC</li> </ul>
<b>Regional media coverage</b>	<ul style="list-style-type: none"> <li>● Express &amp; Star, Shropshire Star, Belfast Telegraph</li> </ul>
<b>Trade/tech outlets</b>	<ul style="list-style-type: none"> <li>● TechCrunch, Mirage News, News Media UK, ET, Verdict, NS Tech, Computer Weekly, Tech UK, SCL, ZDNet, Research Live, Public Technology, Trusted Reviews</li> </ul>
<b>Government related outlets</b>	<ul style="list-style-type: none"> <li>● The Parliamentary Review, Global Government Forum, Government Computing, EU Observer, News Parliament</li> </ul>
<b>Other/ Social Media Engagements</b>	<ul style="list-style-type: none"> <li>● Reddit page off the back of the Guardian coverage, with comments highlighting how CDEI is influencing the conversation and on news outlets such as theeyeofmedia.com and lateststories.readuseful.com</li> <li>● Key engagements on Twitter include Areeq Chowdry, David Frank, Rachel Coldicutt, Ryan Browne, Demos and the 5Rights Foundation.</li> </ul>

Despite the delay in publication, the dialogue findings have been timely in feeding in a rich understanding of public attitudes, perceptions and expectations into CDEI's first set of recommendations made to government. The public dialogue found that participants valued the individual benefits of online targeting and favoured solutions that would empower individuals to take greater control, protect vulnerable users, and encourage greater transparency and accountability for online targeting amongst internet companies. The dialogue outputs, including the report and vox pops include quotes from individuals and snippets from video diaries which demonstrate how participants views have informed CDEI's review report. CDEI confirmed that *"our recommendations to government were undoubtedly based on the dialogue findings"*.

### 3.2 IMPACTS ON NATIONAL AND INTERNATIONAL ONLINE TARGETING POLICY

CDEI's review report will contribute to the work of DCMS on Online Harms, CMA on online advertising, ICO's work on targeting and the Cabinet Office's work on electoral integrity and transparency. As shown in Box 3.1, CDEI's recommendations fall in three areas as follows:

- **Accountability.** Ensuring that the new regulation the Government is planning holds companies that operate online targeting systems to higher standards of accountability.
- **Transparency.** Making the operation of online targeting more transparent so that people can better understand the impacts of these systems and so policy responses can be built on robust evidence.
- **User empowerment.** Pursuing policies that give people more information and control over the way they are targeted, so that such systems are better aligned to individual preferences.

The Government is expected to respond to the CDEI's recommendations publicly within six months. Through wide dissemination of the findings and recommendations the work already appears to be having an impact. *"This work is beginning to create a buzz – even if the recommendations are not fully accepted by government and the industry, the work will really add value to the research landscape".* (CDEI)

CDEI's review will have particular resonance for DCMS's work following on from the **Online Harms White Paper**<sup>4</sup>, which sets out plans for online safety measures that also support innovation and a thriving digital economy. The white paper suggested both legislative and non-legislative measures in order to make companies more responsible for their users' safety online. It proposes a new regulatory framework for online safety which will make clear companies' duty of care to keep UK users - particularly children and the vulnerable - safer online. This will be overseen by an independent regulator which will set clear safety standards, backed up by reporting requirements and effective enforcement powers. In doing so, the UK would become the first country to act in tackling online harms through a coherent, single regulatory framework that reflects a continuing commitment to a free, open and secure internet. CDEI's recommendations on accountability (Box 3.1) should help to inform how the regulator works and how this role can be supported by independent researchers. CDEI's recommendations in this area were strongly endorsed by oversight group members interviewed for the evaluation, including ICO and NGOs.

The dialogue findings will also help to inform the Government's review of **online advertising regulation**, based on an understanding of the impacts of online advertising on both the economy and society and the study by the Competition and Markets Authority's (CMA) study of the **online targeting market** which will assess three broad potential sources of harm to consumers including:

- to what extent online platforms have market power in user-facing markets, and what impact this has on consumers;
- whether consumers are able and willing to control how data about them is used and collected by online platforms; and
- whether competition in the digital advertising market may be distorted by any market power held by platforms.

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<sup>4</sup> [www.gov.uk/government/consultations/online-harms-white-paper](https://www.gov.uk/government/consultations/online-harms-white-paper)

### **Box 3.1: Summary of CDEI recommendations to government and industry**

#### **Accountability:**

- 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.
- 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:**

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

#### **User empowerment:**

- Regulation should encourage platforms to provide people with more information and control.
- CDEI supports 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.
- The emergence of "data intermediaries" could improve data governance and rebalance power towards users. Government and regulatory policy should support their development.

The review will consider the extent to which the current regulatory regime is equipped to tackle the challenges posed by rapid technological developments. The dialogue's findings - on how little people currently understand about how online advertising works, how difficult they currently find it to change settings and take control and their concerns about how targeted advertising may affect vulnerable people - will all be useful inputs to the review. As noted in *Table 3.3* below, parts of the industry such as the Internet Advertising Bureau (IAB) representing the ad-tech and the online advertising sector, are also embarking on their own work on potential impacts on the vulnerable and looking at developing a Code of Conduct for online advertisers. IAB report that their work will build on the work on vulnerabilities started within this public dialogue.

The Information Commissioner's Office (ICO) is also currently working on related areas including an age-appropriate design code for online services, ad-tech and real-time bidding, the use of data analytics in political advertising, and recently updated guidance on the use of cookies. As noted in *Table 3.3* findings from the public dialogue will be shared internally within ICO and may also influence ongoing work in these areas.



The research may also help to inform future work by the UK Government and the European Union on implementation of the **General Data Protection Regulation (GDPR)**. This will affect online targeting, since it relies heavily on personal data collection, analysis and sharing. Also, at the international level the European Union is discussing **future e-Privacy regulations** that are likely to involve an update of the **Privacy and Electronic Communications Regulation (PECR)** in the UK<sup>5</sup>. This will build on many of the recommendations from the **Unlocking Digital Competition** report<sup>6</sup> published in 2019, to which the Government has committed to respond. The European Union has recently adopted regulations promoting fairness and transparency for business users of online intermediation services<sup>7</sup>. This involves measures such as heightened requirements for online marketplaces and search engines to disclose the main parameters they use to rank goods and services on their site, to help sellers understand how to optimise their presence. CDEI's recommendations on improving transparency and accountability and may also feed into this work.

### 3.3 HELPING TO SHAPE OTHER RESEARCH AGENDAS

The dialogue findings and CDEI's recommendations to government were strongly endorsed by organisations represented on the Oversight Group such as ICO, Which?, DotEveryone and Ada Lovelace, who recognised CDEI's review as strongly reflecting the public dialogue findings. None of these organisations are planning new primary research on online targeting but, for all of them, it remains a key topic which is closely linked to other ongoing areas of online data research. *Table 3.3* summarises some of the ways in which these stakeholders expect the findings of the dialogue to feed into this wider research and policy work.

**Table 3.3: Examples of how the public dialogue findings will help to inform research by other organisations that took part**

Organisation	Examples of how the public dialogue will inform their research
<b>Internet Advertising Bureau (IAB)</b>	Will help to inform IAB research <ul style="list-style-type: none"> <li>“Vulnerable groups and how they are impacted by online targeting and advertising” which aims to produce Good Practice Guidelines for the industry. The research will involve qualitative research and then co-creation sessions with members of the public, IAB member organisations and policy makers.</li> </ul>
<b>Information Commissioner's Office (ICO)</b>	Help to inform ICO work on: <ul style="list-style-type: none"> <li>Ad Tech, which will build on the recommendations in the paper published in 2019</li> <li>Explaining AI decisions to people affected by them and how organisations can make their decisions more transparent – currently out to consultation. May result in a General Framework for Auditing AI systems</li> </ul>
<b>DotEveryone</b>	Findings will help to frame some of the questions in: <ul style="list-style-type: none"> <li>Dot Everyone's 2020 update of the “People Power and Technology Survey” (2018) being designed and implemented during 2020</li> </ul>
<b>Ada Lovelace Institute</b>	Findings will help to frame the discourse and language in related areas of research including: <ul style="list-style-type: none"> <li>The internationally focused “Rethinking Data” project aimed at OECD and EU member states during 2020</li> <li>“Data Regulation and Rights” project aimed at the European Commission to build on the GDPR</li> </ul>
<b>Which?</b>	No work planned on online targeting, but the findings are likely to provide inputs to: <ul style="list-style-type: none"> <li>Digital Life Workstream – identifying gaps in consumer knowledge and developing policy positions.</li> <li>Findings will also be shared internally with the data and policy teams.</li> </ul>

<sup>5</sup> [www.ec.europa.eu/digital-single-market/en/news/stronger-privacy-rules-electronic-communications](https://www.ec.europa.eu/digital-single-market/en/news/stronger-privacy-rules-electronic-communications)

<sup>6</sup> [www.gov.uk/government/publications/unlocking-digital-competition-report-of-the-digital-competition-expert-panel](https://www.gov.uk/government/publications/unlocking-digital-competition-report-of-the-digital-competition-expert-panel)

<sup>7</sup> [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_19\\_1168](https://ec.europa.eu/commission/presscorner/detail/en/IP_19_1168)

For industry organisations such as IAB and Tech UK and ICO the most impactful aspect of the dialogue findings will be how they have underpinned CDEI's recommendations to the Government. However, both organisations also expect to share the dialogue findings with their members: IAB through its 150 member companies on its Regulatory Affairs and Policy Advisory Group; ICO through its newsletter sent out to more than a thousand subscribers; and TechUK through coverage in the trade press.

As one interviewee told us *"We will refer to it and make use of the learning – gives a view but not necessarily all the answers"*.

### 3.4 OTHER WIDER IMPACTS

CDEI is committed to working with the public. This dialogue has been its first large public engagement initiative and has been an important part of building the centre's reputation in its first year of operation. CDEI confirms that they expect to undertake public dialogue as part of their public engagement in the future, but that this is likely to be on smaller, more contained topics and involve fewer participants and locations.

As a fast-growing new organisation, the team has benefited from involving a handful of new staff in different aspects of managing this public dialogue. Individual team members have gained experience in commissioning, scoping/framing and designing workshops, developing stimulus materials, setting realistic timeframes and managing delivery contractors and all have attended at least one public dialogue workshop. They have also learnt lessons about how to frame and design a quantitative survey.

CDEI senior staff now consider that the team is in a strong position to commission and project manage a future public dialogue without further need of Sciencewise support. No follow-on dialogue is immediately planned, but the next dialogue is likely to be in an area such as trust and consent to use of data outside of health applications, perhaps working with a central or local government department.

ICO also reported organisational benefits in learning both about online targeting and public dialogue processes for the half dozen staff who participated as specialists in the dialogue events. The experience is reported to have given a good grounding in the topic and valuable exposure to public attitudes towards potential benefits and harms over and above those captured in the dialogue report.

Many of the other organisations involved in the oversight group had some prior experience of using public dialogue in the online data areas and were less actively involved in delivery of the dialogue.

#### Box 3.2: Policy maker and Oversight Group views

##### Commissioners:

- *"I think the final report is pretty good and definitely goes further than other work in this area has".*
- *"Overall very pleased with the end result".*
- *"Has delivered the sorts of insights we were looking for".*
- *"Dialogue will definitely become part of our future work and in our planning of future workstreams".*

##### Oversight group members:

- *"A useful exercise and some interesting results".*
- *"It's been good for CDEI [as an emerging organisation] to put their stake in the ground with this particular research".*
- *"This sort of public engagement work is increasingly important in this area –we will do more of it"*
- *"As a process it worked really well. The scope was very broad, but this was important for CDEI's first research".*
- *"Important, necessary and interesting work".*

- *“An opportunity for a sizeable group of colleagues not currently working on online targeting to get access to findings beyond what we read in the report”.*
- *“Think they’ve done really well, great job”.*

**Specialists**

*“Really useful opportunity to capture public perceptions”*

**Lessons learnt:**

- The breadth of the research has helped to ensure that the public dialogue provided a good underpinning for CDEI’s first year of activity and may result in significant impacts on policy and research processes.
- In order to institutionalise some of the lessons learnt from running such processes we recommend an internal CDEI team ‘wash-up’ session to agree what worked well and what less so, and to agree best practice guidance for carrying out any future dialogue processes.

## 4. GOVERNANCE AND PROJECT MANAGEMENT

This section describes the effectiveness and efficiency of the governance and project management arrangements as follows:

- **Section 4.1** describes how the oversight group contributed to a robust and balanced public dialogue;
- **Section 4.2** describes the contribution made by stakeholders;
- **Section 4.3** describes how the project management contributed to efficiency of project delivery; and
- **Section 4.4** describes how Sciencewise supported the process.

**A medium-sized fully representative oversight group brought together representatives of the internet industry, regulators and data and ethics think tanks and NGOs. During the early stage oversight group members had a real impact in ensuring potentially vulnerable subgroups were covered, and that the information and language were balanced and accurate. The group became less engaged as the project timeline extended. More active communication from the CDEI team in the later stages of the project on additional research elements, publication dates and how members could help disseminate the findings to different audiences would have helped keep them involved and further maximised the policy and research impact.**

### 4.1 OVERSIGHT GROUP

The membership of the oversight group was selected to complement CDEI's existing layers of governance structures which include CDEI's Board (of which the Chair has been closely involved in the dialogue) and its Targeting Review Steering Group (a subgroup of the Board). One member of the steering group sat on the oversight group and reviewed materials but was unable to attend in person. CDEI took the lead in identifying members, issuing invitations, convening meetings and ongoing communication with the group.

The group met three times: the first to review the wider context and public dialogue objectives and the role of the group (April 11<sup>th</sup>); the second to hear a presentation on top level findings after the first round of the general public workshops (July 3<sup>rd</sup>); and the third to hear a presentation of the findings after all 14 workshops were completed (September 10<sup>th</sup>). Drafts of workshop designs, presentations and stimulus materials and the draft final report were shared electronically. The first and third meetings were well attended by about 10 members each, but the second meeting, falling during the summer holidays, was poorly attended. Although all members were invited to participate as specialists, only the ICO and IAB played this role.

The group included a good mix of mainly young, mid-career specialists from industry bodies, NGOs, academics, and think tanks. Many represented organisations that the CDEI would have been talking to as stakeholders for this project. Those interviewed recognised the need for a large and inclusive group to ensure the public dialogue is viewed as robust and balanced, and in order to maximise opportunities for policy and research impact. Most of those interviewed agreed that the group was inclusive and comprehensive. It was described by one as *"an assembly of the organisations you'd expect to see – all views represented"*. A few interviewees suggested that an actual industry platform / content provider might have been a useful addition. Others suggested that more sceptical groups (such as Open Rights Group or Liberty) could also have been added. These additional voices were included through the stakeholder workshop in the scoping phase.

Many individuals had previous experience of running public dialogues or citizens assemblies in the data and ethics areas and made valuable early contributions in challenging the framing, refining language,

clarifying definitions and developing stimulus materials. They were also helpful in ensuring research did not repeat what had been done before. Half a dozen members also lobbied to ensure that potentially vulnerable groups (the young, those with mental health issues, and the financially vulnerable) were recruited as special interest groups. An industry representative told us that they appreciated having been invited to be part of a formal review group: this and the early involvement of an independent evaluator had given them confidence that the process would be open, objective and that their views would be taken on their merits and, if not fully reflected, then it would be clear why.

All the oversight group members interviewed reported that they had been able to help frame the dialogue giving examples such as “*helping describe the internet industry with a bit more clarity*”, “*making sure younger people were included in the dialogue*” and “*making sure tech savvy individuals were also included*”. For most of the members having taken an active role in the scoping stage seemed to fulfil their need to be actively engaged. Two organisations – ICO and IAB – were involved in providing specialists for the public workshops, but in general the delivery contractors and CDEI found it difficult to encourage OG members to take part in the workshops and some slots for specialists were not filled (see Section 6).

After the third meeting there was a long gap with no communication on additional elements of research, expected outputs or publication dates, until the draft final report was shared for feedback at the end of December. At this point only a few individuals provided detailed feedback, although all those interviewed for the evaluation had read the report. One seasoned member of other oversight groups suggested that a smaller group might have been easier to keep engaged: a more purposeful communication plan keeping oversight group members informed on publication plans and dissemination opportunities might also have helped. Almost all oversight group members interviewed for the evaluation agreed that the time they had put in had been commensurate with what their organisation got out of taking part.

## **4.2 STAKEHOLDER ENGAGEMENT**

Stakeholders were chosen to complement interests already represented on the oversight group and made a valuable contribution to framing the dialogue. Participants included online and advertising business interests and those concerned with data privacy and protecting vulnerable people. Participants were generally very positive about the project, process and objectives. Stakeholders felt they had been able to influence recruitment for special interest vulnerability subgroups. A few agreed to participate as specialists (see Section 6) and several recorded talking heads interviews or contributed to stimulus materials (e.g. talking heads statements on responsibilities and in developing mock-ups of potential solutions), however, a few dropped out at the last moment. Stakeholders played an important role in ensuring the process and views heard by participants were balanced.

## **4.3 PROJECT MANAGEMENT**

Good relationships between the core CDEI and Ipsos MORI teams, with hands on involvement of the CDEI chair were important contributing factors to the success of the project. CDEI commissioned the landscape literature review and took the lead in developing content for sets of stimulus materials on online targeting in different applications and potential solutions to addressing online harms or maximising benefits. Ipsos MORI took the lead in developing introductory materials on online targeting and presenting all the stimulus materials in an accessible and attractive format. CDEI’s input was greater than they had initially expected, but in our view not unusual for a public dialogue in a high-tech area where the policy questions and commissioner knowledge was fast evolving.

Over the extended timeline for the project there was quite a lot of flux in the core team. Within CDEI, the primary project management team was quite fluid with shifting responsibilities as the team grew. On the contractor side, several senior team members shifted post during the final stages. Those interviewed felt that this flux had contributed to some lack of thoroughness in drafting, proofing and taking comments into account which contributed to more iterations in the final report than had been strictly necessary.

As with many dialogues with a reconvened element there was a collective tendency to focus on round one events leaving limited time to develop and pilot materials between rounds one and two. For both rounds last minute additions meant the production of materials and outputs “went down to the wire, but we got there in the end”. The process could have been managed by building in a stepwise approach to the design process including: agreeing objectives for each round and sessions within them; a design workshop involving all of the core management team; and a clear timetable for developing, piloting and signing off stimulus materials.

Both the commissioners and delivery contractors found the procurement process frustrating. From CDEI’s point of view it was difficult for a new organisation to be categorical about the number of locations, group sizes and type of participants to be recruited before the literature review had been completed and the objectives had been finalised: in this context greater flexibility in inviting the contractors to propose different options would have been appreciated. From the contractor’s point of view, the procurement process offered little opportunity to propose options or to fully reflect the costs of more innovative approaches (such as online video diaries and hands on practical examples of solutions).

#### **4.4 WORKING WITH SCIENCEWISE**

Both the commissioners and delivery contractors appreciated the role that Sciencewise played in supporting the process, citing the experience of the DES as really helpful in guiding a young organisation on how to build the business case and reigning in the temptation to cover too much in the individual workshops. *“Sciencewise has been really helpful in terms of the procurement process and design. The external oversight [required for Sciencewise supported projects] has been a good additional layer of governance”* and *“The DES really contributed a lot of useful experience and assurance”*. Several evaluation interviewees also noted that it gave them confidence to have an independent evaluation running as a formative element throughout the process.

##### **Lessons learnt:**

- In order to maintain the attention of the oversight group, scheduling the second meeting as a more active opportunity to be involved in thinking about potential solutions or circulating materials electronically and avoiding the holiday period might have helped to maintain momentum.
- More active communication after the third meeting – explaining additional research tasks commissioned, how CDEI were using the findings and the publication/launch date would have helped to keep all members involved until the end. Group members reported that they would have been happy to take on clearer roles in disseminating the findings through a variety of different channels for different audiences.
- The efficiency of the design process could have been improved with a clear timetable for: agreeing the objectives for each round and sessions within them; running a design workshop with the core management team (and possibly some of the oversight group); developing, piloting and signing off stimulus materials.

## 5. ASSESSMENT OF HOW FAR THE DIALOGUE HAS MET ITS OBJECTIVES

This section assesses how the dialogue has met its objectives and is organised as follows:

- Section 5.1 describes the overall achievement of the objectives and how views on the credibility and robustness of the process have contributed; and
- Section 5.2 describes how far specific objectives have been achieved.

The evaluation draws on evidence including:

- Our expert assessment of how effectively the dialogue objectives have been addressed through the design and the findings captured, analysed and presented in the final report;
- Questions in participant and specialist/observer feedback surveys on whether they were clear on the purposes of the workshops.
- Interviews with selected oversight group members and the commissioners about how well the stated project objectives have been met.

**Three of the four objectives were fully met and the fourth was substantially met. The dialogue successfully engaged a diverse and inclusive sample of the public to explore attitudes towards online targeting practices, the potential benefits and harms of these practices and the protection of vulnerable people and the governance of these practices, including potential solutions that might facilitate beneficial uses and minimise harms (Objective 1). The design also helped to explore the values and principles underlying public attitudes towards online targeting of content, products and services (Objective 2). Evaluation interviewees agreed that this added real value in addressing current gaps in the literature.**

**A set of pen portrait case studies deepened current understanding of attitudes in a wide range of previously unexplored contexts/applications. The dialogue attempted to explore the views of potentially more vulnerable subgroups (such as 16-18-year olds, BME communities, those with mental health and financial vulnerability issues) through specialist subgroups. However, whether because they in fact held very similar views to other participants or due to design of the subgroups, the views of these subgroups did not emerge as particularly different either during the deliberations or in how they were reported. On the whole most participants tended to view other people, and not themselves, as potentially vulnerable (Objective 3).**

**A much clearer understanding of participants' views on the trade-offs involved in online targeting in different contexts including commercial, public service delivery and content (e.g. news and political messaging) did emerge. The discussions and follow-up quantitative polling highlighted participants' preference for change and more control, but without giving up too many of the perceived benefits of personalisation (Objective 4). Participants identified roles for government, internet companies and themselves in implementing such solutions.**

### 5.1 ACHIEVEMENT OF THE OBJECTIVES

*Table 5.1* summarises how the public dialogue elements were designed to meet the four objectives.

The objectives and the 'big question' for participants were introduced on day one and reiterated in the introduction to workshop two. The CDEI video introduction made it clear how the dialogue findings would feed into its work and CDEI staff stressed through their inputs as specialists and in plenary sessions that participants' views would feed into their advice to government



**Table 5.1: Dialogue objectives and how elements of the design delivered them**

Objectives	Success	Oversight group and Stakeholder workshop	Workshop one	Workshop two
<b>1. To engage a diverse and inclusive sample of publics to explore attitudes towards online personalisation of products, potential benefits and harms and governance of practices</b>	✓	Inputs on decision to recruit special interest subgroups (BME, young people, financially vulnerable and those with mental health issues). Input to stimulus materials, PowerPoints and 'talking head' statements	Recruitment of 90 general public in three locations reflecting socio-economic characteristics of their locations Recruitment of 60 from specific subgroups in four additional locations. Incentive payments to ensure people could participate, regardless of their economic situation. Sessions on what personalisation is, on potential benefits and harms and on current policy and regulatory arrangements at all 7 locations	
<b>2. To understand the values and principles underlying public attitudes towards personalisation</b>	✓	Stressing the need to consider benefits as well as harms and to consider cumulative societal impacts (such as radicalisation and polarisation)	Self-exploratory sessions on what people already knew; designing their own services; talking head videos; washing line views on the balance between benefits and harms	Reflections from workshop one and video diaries on sentiments after day one. Sessions exploring potential trade-offs and redlines.
<b>3. To understand if and how attitudes vary:</b> • in different contexts • across different subgroups of participants	Partially ✓	Generated ideas for contexts and how experience of different subgroups could be explored	Exploration of 12-14 pen portrait scenarios in different vulnerability, autonomy & reliability contexts to understand balance in attitudes between benefits and harms to individuals and others. Sub-groups followed the same workshop format but did not highlight substantial differences in view from general groups	
<b>4. To explore participants' views on the trade-offs involved in personalisation in different contexts including commercial, public service delivery, content (e.g. news and political messaging)</b>	✓	Input from stakeholders in designing practical solutions e.g. for political ad libraries	Exploratory session on trade-offs between benefits and harms. Homework task prompted participants to become more aware of their own exposure and to try and change settings on social media.	Reflections on homework and difficulties users had changing settings; focus on potential trade-offs between increasing protection and retaining benefits through a set of potential solutions. Reflections on whose responsibility it is to act.

There was positive feedback from all participant groups that they understood the objectives. Informal remarks by individuals indicated how pleased they were to be part of the process. CDEI's presence at almost all the workshops and in taking the opportunity to reflect back on what they had heard and learnt in the final session appears to have contributed to positive views of participants.

#### **Box 5.1: Public participant views on policy objectives**

- 👁️ By the end of the first round of workshops 99% (142 of 143 respondents) agreed that they were aware of and understood the objectives of the workshops.
- 👁️ The design and feel of the workshops, which made it clear that the participants' views were highly valued, played a clear role in participants' perception that the events had achieved what they set out to do.
- 👁️ The vast majority (93%, 126 out of 136 who answered the question) felt that CDEI was likely to take their opinions into account.

A number of organisations represented on the oversight group had some prior experience of public dialogue, Citizen Juries and other forms of deliberative or qualitative research. All those interviewed agreed that, given the very limited public understanding of how personalisation works and is regulated, a public dialogue was the only credible methodology for achieving the objectives of the research. The commissioners and oversight group members found the size, geographic coverage and framing of the dialogue process robust. Many felt that the final report did a good job in pulling together the findings in a policy-friendly format. However, most oversight group members had not been aware that additional research - such as follow-on depth interviews and the quantitative survey – had been undertaken after

the third oversight group meeting. Those interviewed were all satisfied that the research had added value and filled gaps in the research landscape.

**Box 5.2 Views of commissioners and stakeholders on the credibility and robustness of the research**

- *“Public dialogue made complete sense in this area because the pace of change is so fast – helped to understand where redlines are, trade-offs, recommendations to government”*
- *“The deliberative approach was really good and absolutely necessary – we couldn’t have got to the richness otherwise. Workshops were designed well not to lead people ...”.*
- *“We’re supportive of the public dialogue methodology. Think it’s a really useful approach to get depth of views in this complex area”.*
- *“Data, research and findings have been incredibly useful, and people will read it for that (even though the report itself is not terribly well written or engaging)”.*
- *“One of the important and unique aspects of this dialogue was the evening workshops with specific groups....It would have been good to hear what those “vulnerable” people say themselves, and perhaps highlight where these may be different to [our] assumptions”.*
- *“Dialogue was the only way to approach it and gave space to give people as close to real life experiences as possible rather than idealised/sanitised”.*
- *“Got to be a dialogue – need direct engagement to really understand – we do quantitative surveys and get usable headline percentage figures, but you can only attach a certain credibility to it. You need to get a group in a room for an extended period to really dig into the issues”.*

## **5.2 HOW FAR SPECIFIC OBJECTIVES WERE MET**

### **5.2.1 To engage a diverse and inclusive sample of the public to explore attitudes**

The first objective was to engage a diverse and inclusive sample of the public to explore attitudes towards: online targeting practices; the potential benefits and harms of these practices, particularly with regard to their impact on human autonomy (e.g. if they are manipulative), the trustworthiness of news and media content, and the protection of vulnerable people; and the governance of these practices, including potential solutions that might facilitate beneficial uses and minimise harms. This objective was fully met.

The dialogues brought together 147 participants in seven UK locations for the first set of workshops and 136 participants for the second workshops. The groups reflected an appropriate mix of socio-economic classes, gender, age and life-stages that the core project management team and OG had agreed, as shown in *Table 5.2*. In most cases recruitment reflected the quotas, but with slight over-recruitment of women and under-recruitment of BME individuals (26% of the total group compared to a target of 36%). However, the inclusion of a BME subgroup of 14 individuals from Afro Caribbean and Asian communities gave an opportunity for the views of BME participants to be heard and reflected in the findings. One BME participant in London also told us *“I’m pleasantly surprised, it actually looks like London...”*. Our observation was that almost all participants were fully engaged over the two days. There was a relatively low level of drop out (6%) between the two sets of workshops.

Oversight group members had particularly stressed the need to hear from participants with a range of digital literacy and this was included as a screening question. Those who initially considered themselves highly digitally literate were slightly over-represented (57% of the total sample), but the groups also included a good mix of older people, including those who were not heavy internet users. Also, as people

learnt more about personalisation, many participants appeared to reassess how much they really knew, with only 37% (50) feeling that they had known a fair amount, and only 4% (6 of 136) feeling that they had known a lot about online targeting before the dialogue started by the end of day two.

**Table 5.2: Recruitment quotas and participant mix achieved**

	Demographic	Target (of 150)	Achieved	Achieved as % of sample
Gender	Male	Minimum 57	69	45%
	Female	Minimum 57	83	55%
Age	16-18 Newcastle	15	17	113%
	18-30	Minimum 23	30	20%
	31-44	Minimum 23	40	26%
	45-60	Minimum 23	35	23%
	65+	Minimum 23	26	17%
	BME General	Minimum 55	40 (incl 14 in Leeds subgroup)	26%
SEG	ABC1	Minimum 48	77	51%
	C2DE	Minimum 48	75	49%
Parents of children who:	Live at home	Minimum 35	51	34%
	Sometimes live at home	Minimum 15	15	10%
	Left the home	Minimum 15	32	21%
	Have no children	Minimum 15	40	26%
Employment	Employed	Minimum 59	87	57%
	Unemployed	Minimum 48	65	43%
Digital Literacy	High	Minimum 30	87	57%
	Medium	Minimum 30	41	27%
	Low	Minimum 23	24	16%

The first set of workshops explored how online targeting works and the potential benefits and harms through unprompted self-discovery sessions and then a PowerPoint presentation and a pre-recorded video by specialists. Two fictional online profiles (whose online behaviour had been developed by the Ipsos MORI team over several weeks), provided a very practical demonstration of how personalisation works in practice. Small group discussions reaffirmed previous evidence that the public have little or no understanding of online targeting processes – particularly outside personalised advertising – and many were initially shocked as they learnt more about its sophistication and prevalence.

### **Box 5.3: Oversight group and commissioners' views on how well the objectives were met**

#### ***Reaching a diverse and inclusive group of participants***

- *"There were really good discussions with a great mix of people around their attitudes".*
- *"An engaged, diverse and inclusive sample with good regional coverage".*
- *"Good geographical spread – opinions can vary a bit – seemed to be a good range of participants in terms of knowledge and tech use".*

#### ***Resonating with existing research findings***

- *"The findings all chime – extended the knowledge and got some specific insights not in the literature at the moment".*
- *"People's lack of awareness echoes our work: people start from a very low base but when they grasp how things work they get very interested and feel there should be more awareness and action/education".*
- *"Findings on lack of transparency and accountability resonates with our own work - people have concerns, they find the degree of personalisation a bit creepy, but they don't want it to stop".*
- *"Good to see findings reinforced our own about people not knowing much and feeling lack of control – and interesting to see research extended beyond personalised ads into content and political advertising".*

- *“Surprises? Not really but it did add value because this is an area where there wasn’t much in-depth research. A good thing to have done”.*

#### **Adding value to the research landscape**

- *“It’s a difficult thing to explore people’s values and understanding their tolerance for risk but [the dialogue] achieved this”.*
- *“[Pen portrait] personas were simple and telling”.*
- *“It really helps fill a big gap in the current research landscape”.*

#### **Areas where the research could have gone further**

- *“Shame views of different [potentially vulnerable] subgroups didn’t come through more strongly in the reporting”.*
- *“It would have been nice to see more of the views from the subgroups reflected in the text”.*
- *“The homework video task tried to get people to do real life tasks but was not much referred to in the final report”.*

### **5.2.2. To understand the values and principles underlying public attitudes towards online targeting of content, products and services**

This objective was well achieved and all interviewees for the evaluation felt that the research had helped to deepen current understanding of values and principles underlying attitudes towards online targeting. The table discussions provided many opportunities to probe underlying attitudes and why participants held the views they did, while the washing line exercise before lunch on the first day presented a nice ‘infographic’ snapshot of people’s evolving feelings about personalisation which was revisited at the end of the day when people understood more about how online targeting was used in different contexts.

The discussions tended to reinforce findings from previous research that, as people learnt more about online targeting, they became more concerned about the risks of exploitation of people’s vulnerabilities and the manipulation of their behaviours and beliefs. As with other research, trust (based on who is carrying out personalisation) and control (how far individuals felt they had agency over personalisation) emerged as important factors underlying attitudes. The findings also added value to previous research by highlighting a growing sense of the need to protect ‘vulnerable’ individuals, while finding it difficult to imagine wider societal harms that could come from collective experience (such as a more radicalised or polarised society). The homework task of talking to friends and family about their views on online targeting allowed participants to reflect back on how their attitudes had changed at the beginning of the second workshops.

### **5.2.3. To understand how attitudes vary in different contexts (through a range of case studies) and across different subgroups of participants**

This objective involved two sub-objectives: the first was well met in terms of understanding attitudes in a wide range of different contexts/applications; the second element of getting a more granular understanding of attitudes within different subgroups did not emerge as strongly from the research as expected.

The major tool for exploring participant attitudes in different contexts was a set of projective pen portraits (initially 14 reduced to 12 after the pilot in London) which put participants in the shoes of different characters. Each scenario explored a different application from online advertising and personalised recommendations for content (music, videos, news, political messaging, interest groups, health advice etc.) some of which would have been new to participants. Each group looked at about 10

applications. The exercise helped surface both perceived benefits and potential harms in contexts ranging from bland everyday online advertising through misleading health information to radicalisation through exposure to recommendations for ever more extreme content. The non-advertising applications had not been covered in previous research.

Participants were able to relate most easily to the online advertising and content recommendation scenarios: for these scenarios they identified potential individual vulnerabilities both for those with long term conditions and those who were temporarily vulnerable at different points in their lives. Less familiar applications (such as micro-targeting of political adverts or algorithm bias in recommending job opportunities) proved more challenging for participants to explore: they seemed less interested in the applications and also found it difficult to imagine that lack of transparency, discrimination or bias in the algorithms might impact on society as a whole. Discussions in these contexts made less progress, but themes such as discrimination and bias were picked up through follow on depth interviews (with five individuals) after the workshops.

In general oversight group members reported that the dialogue had really added to existing understanding on context-specific benefits and harms. Several interviewees commented on the level of agency that participants seemed to give themselves: participants across all groups appeared to consider themselves more tech savvy, resistant to manipulation and less likely to be vulnerable than policy makers and researchers in the field would have expected.

Adapting the design of the dialogue to include ‘vulnerable’ subgroups was praised by oversight group members interviewed for the evaluation as real design strength of the dialogue. The expectation was that individuals that others saw as more vulnerable would feel more comfortable talking about their personal experiences in smaller groups of those with similar issues. The hope was that these discussions would highlight whether young people or participants from BME communities, or those with financial vulnerabilities or mental health issues were more sceptical or fearful of online targeting and whether they would call for stronger protections against potential harms than participants in the general groups. Almost all of the oversight group members interviewed were disappointed not to have seen the views of these groups given greater emphasis in the final report.

In practice, only two groups generated any substantial differences in attitude to the larger generic groups. The two groups who visibly shared common characteristics – 16-18-year olds and the BME group – did appear to have slightly different views. For instance, young people tended to be more positive about a wider range of uses of data for online targeting and to be less concerned about the use of inferred characteristics for targeting purposes. They were also more trusting of organisations to use online targeting in a responsible way and more confident in their own abilities to change their user settings to protect themselves. In contrast, members of the BME group seemed less trusting about their data being used responsibly and more sceptical about companies or government putting the user first or providing robust controls to help mitigate online harms.

For the two other subgroups – the financially vulnerable and those with mental health issues – their views on potential benefits and harms were almost indistinguishable from those of the generic groups, with perhaps slightly heightened feelings around the need to protect vulnerable individuals. Neither did the groups generate much evidence of lived experience of online harms. It is not clear whether these findings reflect the observation from the general groups that people tend to think that others are more vulnerable than themselves, or whether different findings might have emerged with a different design approach. An approach more tailored to exploring specific vulnerabilities might have included: recruiting even smaller groups (10-12); emphasising shared characteristics in the subgroups from

recruitment, through introductions at the workshops to the selection of the pen-portraits/ case studies they focused on; and allowing more time to hear from those with lived experience of the harms being considered. However, this approach would need to be balanced against the risks that sharing the research hypothesis could have biased the discussions and skewed the findings.

Follow-up depth interviews did provide an additional opportunity to delve deeper into the experience of a few individuals who had hinted at personal experience of online harms (e.g. through radicalisation of a family member or exposure to advertising for online gambling). However, even in this more private setting, no one identified themselves as more vulnerable than anyone else, and no one reported having tried to change their own settings to protect their privacy. Several of the oversight group members interviewed are now planning further qualitative work on vulnerable groups (see Section 3).

The follow-on quantitative survey offered the opportunity to examine the extent to which there are differences in opinion between key subgroups such as age and gender. This endorsed the findings of the dialogue that young people are generally more positive about the benefits and less concerned about the harms of online targeting.

#### **5.2.4. To explore participants' views on the trade-offs involved in online targeting in different contexts including commercial, public service delivery, content (e.g. news and political messaging).**

The dialogue successfully offered rich insights into how an informed group of participants felt about the trade-offs and some of the inherent tensions within the current online targeting system.

Trade-offs were explored gradually through both rounds of workshops. Sessions on the first day started to explore potential trade-offs, a PowerPoint explained the current regulatory context and case studies explored a set of real-life examples or mock-ups of potential solutions developed by CDEI and stakeholders. The potential solutions covered a wide spectrum of responsibilities for action from individual users to online platforms or government regulation. User-led solutions included greater use of individual privacy setting and controls. Internet industry-led solutions included improved user interface design, making extreme or harmful content more difficult to view, and making libraries of political adverts available to view. Government-led solutions included regulations to protect vulnerable individuals and protected groups. Between the sessions about 30 participants were tasked with trying to change their own privacy and ad preference settings online. This task helped to highlight the tensions between people's desire for control and their ability to take it, which proved far more difficult than most participants had expected.

A PowerPoint presentation at the second workshops introduced participants to the complex regulatory landscape that applies to different aspects of online targeting. We noted that participants struggled to distinguish the roles of different regulators from 'Government' in general. However, this did not limit their ability to form opinions about where the balance of responsibilities should lie in minimising harms. The findings were that almost all participants believed that: the status quo on online targeting needed to change; the responsibility should be spread between government, industry and users; and that more action is needed to improve transparency, increase accountability and empower users to take control of how they are targeted. However, the dialogue also highlighted that most people enjoyed the convenience of online targeting and freedom of expression and would not welcome any solutions that introduced too much friction/inconvenience to their online experience.

CDEI and oversight group members found these insights interesting, an addition to existing knowledge and likely to be useful in informing DCMS's Online Harms Bill. The findings on the lack of participant

awareness and use of personal settings were seen as particularly useful, especially in the context of the CMA's proposed solutions on fairness in design in their Online Platforms and Digital Advertising Market Study interim report.

The quantitative survey added a useful opportunity to test and endorse some of the key messages – such as the need for independent oversight of the internet industry – albeit with respondents who were much less informed than the dialogue participants. The survey found that 61% of respondents preferred an independent regulator to have oversight of the internet industry rather than letting the industry take responsibility for improving online targeting systems itself (17%).

#### **Lessons learnt:**

- The design of the two days of workshops allowed all four objectives to be met. This has added to previous understanding of participants' views on online targeting in different applications and where and how they think current approaches need to change.
- Including subgroups focused on participants expected to be particularly vulnerable or to hold significantly different views was a strong adaptive design element. The views of these 60 participants were captured and reflected in the dialogue outputs. However, it is not clear whether the similarity of views between the subgroups and main groups is a reflection that they simply do not see themselves as any more vulnerable than anyone else, or a reflection of the design of the workshops.
- Future dialogues wishing to explore the issue of vulnerability should consider whether a design tailored to specific groups (size of group, explanation of why they have been recruited, stimulus materials, sessions to explore personal experience) might create a safe space which allows more lived experience and nuanced views to surface.



## 6. HOW DELIVERY MET SCIENCEWISE BEST PRACTICE

This section assesses how far this dialogue has met good practice standards. The assessment draws on the following evidence:

- Formative review of the dialogue design, recruitment brief and stimulus materials against the Sciencewise Quality Framework and guiding principles;
- Observer assessment of a sample of eight out of 14 workshops; and
- Quantitative data collected in participant and specialist feedback surveys on their views on the information they received, the contribution of different ways of working and tools, the role of specialists and facilitators and the logistics for the workshops.

**An experienced contractor was able to deliver a well-designed set of workshops whose structure worked well for both larger and small groups. The design was balanced in terms of covering both benefits and harms, and in exploring both personal and societal impacts. Despite the very wide framing of the topic and the ambition to cover many different applications and potential solutions, the process and material design managed to convey enough information for the participants to feel informed to contribute to the discussions without overwhelming them. A large and experienced facilitation team were able to keep the discussions on track, ensure that almost everyone contributed actively over the two days and that participants felt that their voices had been heard.**

### 6.1 OVERALL DELIVERY OF BEST PRACTICE

*Table 6.1* summarises our assessment of how successfully the dialogue met Sciencewise best practice across all key criteria. The following paragraphs focus on the areas of best practice which we identified as key challenges for this public dialogue, including:

- **Striking a balance between discussing the potential benefits and harms of online targeting.** This challenge was highlighted by the literature review and in discussions with the oversight group and stakeholder group. The design and materials also needed to allow participants to gradually explore personal and wider societal benefits/harms in the short and longer-term and then consider the trade-offs inherent in some of the proposed solutions.
- **Giving people sufficient, accessible, engaging information** to explain how online targeting works, the complexity of the network of actors involved, the fast pace of innovation and the fragmented regulatory context, in a way that they could understand and which enabled them to contribute confidently to discussions without overloading them with information. The dialogue also faced the challenge of working through a large number of case studies while keeping participants interested and engaged.
- **Providing participants with access to a range of specialist knowledge** to help answer their questions. Given the large number of individual workshops (14) ensuring that everyone had equal access to a range of views was a considerable challenge.

These three areas of good practice delivery are discussed in more detail below.

**Table 6.1 How Sciencewise good practice principles were delivered in the dialogue**

Good Practice		Evaluation of how good practice principles were delivered
<b>Fair and balanced</b>	Yes	<ul style="list-style-type: none"> <li>Introductory discussions allowed participants plenty of self- discovery about the potential benefits of personalisation in different contexts.</li> <li>PowerPoint presentations (by Ipsos MORI) and talking heads videos (two academic and one industry specialist) were well balanced presenting both benefits (morning) and potential harms (afternoon). Sound quality and buffering made these hard to hear in some locations. Presentation of the different user profiles of two tablet users and the assumptions that algorithms would draw about the characteristics of the IM lead facilitator were innovative and worked well to demonstrate how personalisation worked in practice.</li> <li>Pen portraits on day one effectively drew out both benefits and harms and helped participants to put themselves in the shoes of others. When revisited on day two they helped to identify solutions.</li> <li>Almost all participants agreed (65%, 92 strongly agreed, 32%, 46 tended to agree) that the pen portraits helped them to think about both benefits and potential harms of personalisation.</li> <li>By the end of first round of workshops 97% of participants (70%, 101 strongly agreed and 27%, 39 tended to agree) that the information provided was fair and balanced.</li> <li>Independent specialists were not available in the room at all 14 workshops. CDEI and or ICO attended almost all events and we observed that specialists and facilitators were able to answer queries raised satisfactorily for participants.</li> <li>Participants largely agreed (83.1%, 118 strongly agreed, 13.4%, 19 tended to agree) that the specialists in the room were helpful in answering questions in a way that was easy to understand.</li> </ul>
<b>Sufficient time and information for deliberative discussions</b>	Yes	<ul style="list-style-type: none"> <li>The agendas for both full days (one and two) were packed with a lot of content to cover. However, good timekeeping meant that sessions started and finished promptly without curtailing any discussions or sessions.</li> <li>By the end of the first round of workshops 98% of participants (142 of 144 respondents) agreed that they had been given enough, clear information on personalisation of online products to enable them to contribute to the discussions.</li> <li>By the end of the second round of workshops all 136 participants were unanimous (67%, 91 strongly agreed, 33%, 45 tended to agree) that the information shared by specialists had been a successful element of the workshops. One highlighted the usefulness of the video: <i>"I didn't have a clue about this topic prior to this workshop. The video in the first workshop which explains what personalisation and targeting is was very helpful"</i>.</li> <li>Afternoon sessions (pen portraits and solutions) covered a lot of ground and tasks were sometimes a bit rushed or repetitive. Specialists pointed out that there were lulls in some afternoon sessions.</li> <li>At the end of the first workshops a small minority of participants (5%, 7 respondents) reported that they had too little time, or were unsure if there was enough time. Several noted that there were too many examples and that debate on some had to be curtailed.</li> <li>By the end of the second round of workshops the vast majority (97% of 136 respondents) agreed that there had been enough time overall and a typical view was <i>"time flew, good days!"</i> Only 4 individuals were unsure or disagreed and these were all in the sub-groups for financially vulnerable and those with mental health issues in Southampton and Falkirk respectively.</li> <li>By the end of the second set of workshops participants were almost unanimous in thinking (98.5%, 135 out of 137 respondents) that the structure and how the sessions were organised had worked well.</li> </ul>
<b>Respect for public participants</b>	Yes	<ul style="list-style-type: none"> <li>The large pool of facilitators offered continuity in most locations and reflected the characteristics of participants in the young and BME sub-groups. Facilitators were able to involve all individuals including quieter/less involved individuals and limit the more enthusiastic participants from dominating, sometimes by mixing up the sub-groups.</li> <li>Facilitators for the sub-group sessions were briefed on how to deal with any potential emotional reactions that might have been triggered by the discussions. Leaflets or information on relevant local support services were also provided.</li> <li>We observed that all participants were treated with respect and facilitators were briefed to address any sensitivities that might arise from the topic areas. We did not observe anyone made to feel uncomfortable about their political, religious or health beliefs (e.g. through the scenarios on radicalisation, anti-vaxxers and political micro-targeting).</li> </ul>

		<ul style="list-style-type: none"> <li>Almost all participants reported that they were treated equally and with respect (86.8%, 119 strongly agreed, 11.8%, 16 tended to agree). The view <i>"we were treated fairly and allowed to talk freely without judgement"</i> was common.</li> <li>Almost all participants agreed (73%, 104 strongly agreed, 25%, 36 tended to agree) that they were able to contribute their views and have their say. A single participant in Tamworth reported that one individual had been allowed to dominate a group. However, generally participants were full of praise for the quality of the facilitation making comments such as <i>"all facilitators made sure that everyone had their say"</i></li> </ul>
<b>Quality and depth of facilitation</b>	Yes	<ul style="list-style-type: none"> <li>We observed some excellent facilitation. Facilitators created a warm and lively dynamic at most events. They sought to summarise / clarify what was being said carefully. We saw no evidence of overt direction / over-interpretation.</li> <li>The washing line exercise in plenary allowed facilitators to probe the underlying reasons for people's positions.</li> <li>Specialists highlighted the difficult role that facilitators had in getting through the pen portraits and solutions but were full of praise for an excellent facilitation job.</li> <li>Participants were unanimous in feeling (75%, 102 strongly agreed and 25%, 34 tended to agree) that the facilitation had been independent, professional and effective, illustrated with remarks such as <i>"the team were very diligent and led the group well"</i>, <i>"I felt listened to – [the facilitator] was able to concisely capture my thoughts"</i>. Individual facilitators were praised for their personal style (warm, inclusive, fun).</li> <li>The sub-groups on financial vulnerability and mental health would have benefited from more flexibility for facilitators to explain why individuals had been recruited and to encourage them to share any lived experiences of vulnerability to online targeting.</li> </ul>
<b>Recording the dialogue</b>	Yes	<ul style="list-style-type: none"> <li>A dedicated note-taker and audio recorder captured all discussions at each table. Participants also provided their feedback on post-its, on individual worksheets and in homework diaries.</li> <li>Transcribed quotes were used to illustrate the final report and helped bring the report to life.</li> <li>Flip charts were used extensively to capture small group discussions and to record trade-offs and thoughts on roles and responsibilities in matrixes.</li> <li>30 participants who completed video diary work submitted it on the IM AppLife App which analysed responses and were edited into a vox pop video.</li> <li>A video maker recorded vox pops in a spread of locations presented as a 3-4 minute film.</li> </ul>
<b>Capturing agreement, disagreement and uncertainty</b>	Yes	<ul style="list-style-type: none"> <li>Facilitators deliberately and regularly canvassed reactions and whether there were any outstanding points / views people wished to share / raise.</li> <li>The 'washing line' exercise and discussion to probe people's reasons for their positioning worked well to demonstrate the difference of views on the relative benefits/harms of personalisation before lunch and at the end of the day. The decision to discuss this in plenary rather than in small groups, as initially planned, worked well so that people could get an impression of how the whole group was thinking.</li> </ul>

### 6.1.1 A fair and balanced dialogue

A good balance was achieved through the workshop structure, materials design, contributions from specialists and independent facilitation. The steady build-up of information provided through unprompted sessions at the beginning of the first day workshops allowed participants to self-discover how online targeting shaped their internet experience and focused initially on the benefits. The talking heads video reinforced the current benefits of personalisation (in the morning) and then went on to explore potential harms in the afternoon, after participants had explored these themselves through pen portraits. The videos included the views of industry representatives and academics. CDEI and the contractors made real efforts to get commercial business representation on the oversight group and at the stakeholder workshop and their inputs helped to fill gaps in the literature review by highlighting some of the benefits of online targeting in different contexts.

CDEI developed a series of scenarios which demonstrated the contexts and applications identified through the literature review. Initially a few oversight group members were worried that the inclusion of extreme scenarios (such as radicalisation, online gambling, anorexia and anti-vaxxers) might prove more memorable than the everyday uses of personalisation, so biasing the discussions towards harms. However, through several iterations of drafting and amendments based on comments from the

oversight group members, all those interviewed for the evaluation were satisfied that a fair balance had been achieved across the set of stimulus materials.

Participants were unanimous in agreeing that facilitation was independent, professional and unbiased. Individual facilitators were praised for keeping the discussions on track, giving everyone a voice and encouraging more dominant individuals to step back and quieter individuals to speak up.

On balance, specialists and almost all participants agreed that the overall framing and information provided was fair and balanced. Nevertheless, participants still struggled to think about the potential benefits or harms for society at large or in the longer term.

### **6.1.2 Providing participants with sufficient, engaging, accessible information**

**Timing and flow.** As a first piece of public engagement by a new organisation, CDEI and the oversight group members were keen to explore the full breadth of online targeting applications and potential solutions. This posed the challenge of giving participants a broad contextual understanding so that they felt enabled to discuss a broad range of applications and solutions. There was a great deal of stimulus material to cover (including videos, PowerPoint presentations, a quiz, an exercise to design a 'good' personalised online service, pen portraits, talking heads and potential solutions). However, careful design and good time-keeping meant that no sessions were curtailed and all the content was covered. By the end of both the first and second round of workshops 95% of participants felt they had had enough time to discuss the issues.

This was a considerable achievement given the much shorter time available for the subgroups where six hours of content from the larger groups was concentrated into three hour sessions for the small subgroups. There was a risk subgroup sessions would feel rushed and discussions would be curtailed. Our observation was that because the groups were so much smaller in most cases they had enough time to cover the necessary material. However, a small minority of participants ( 5%, 7 of 143 respondents on day one, mainly from the BME subgroup in Leeds and those with mental health issues in Falkirk) felt they did not have enough time. These individuals may also have struggled with the volume of information: they tended to be the same participants who reported that they still felt that they still knew little about personalisation by the end of the events (see *Section 7*). One visually impaired individual also reported that the print size was not accessible. Those that felt time was rushed also included a few older people who described themselves as limited users of the internet. These findings suggest that these subgroups might have benefitted from even smaller group size (say 10-12) and a design and stimulus materials more tailored to their specific vulnerabilities.

**Amount of contextual information.** Participants received contextual information on how personal data is collected and used for targeting online and how it is regulated. Some specialists who attended the public workshops would have like to see participants getting even more detailed information on how data is collected, the intricacies of how ad tech works and a detailed explanation of the General Data Protection Regulation (GDPR) and Privacy and Electronic Communications Regulations (PECR) currently work. However, our assessment was that, on balance, participants received about as much information as they could cope with and that the combination of PowerPoints, videos, scenarios and talking to specialists struck an appropriate balance between detail and accessibility. The vast majority of participants (99% of 143 respondents) felt that they had been given enough, clear information to allow them to contribute to the discussions. A few individuals remarked that there was a lot of information to absorb. Those that wanted to do their own research had the opportunity to do so in the three-week break.

**Some of the materials and tools were very innovative.** The customised profiles of two fictional tablet users and an illustration of what algorithms/AI would deduce about the character and interests of the Ipsos MORI lead facilitator was a light-hearted illustration that really helped participants to understand

the extent of online targeting practices and the types of data that are being collected about them. Originally this was planned as a live exercise but, to avoid technical glitches, the results were presented offline. These practical illustrations provided very clear examples of how personalisation leads to individuals seeing very different adverts and content recommendations. Given the amount of time required to create these profiles it would have been nice to use them more, over the two days, to give some participants hands-on experience of how solutions might work in practice (e.g. to demonstrate the impact of changing user privacy settings during the second round of workshops). The homework task partly achieved this on a small scale: the 30 participants who signed up for video diaries were tasked with changing their privacy settings and preferences. Their experience (and often failure) to do so could have been exploited more during the second round of workshops and written up in more detail in the final report.

**Pen portraits were simple and effective, but a bit repetitive.** The pen portraits were well presented and proved a simple and effective way of exploring a full range of online targeting applications. Each small group looked at about 10 pen portraits over two sessions on the first afternoon and then revisited some pen portraits to start to identify trade-offs during the second workshops. The vast majority of participants reported that the pen portrait scenarios had been helpful, noting that they helped to bring the issues alive, put themselves in the shoes of others, and to recognise the risks to vulnerable people. Several participants stressed their effectiveness with comments such as *“I liked having scenarios to enable discussion, it made it more interesting”* and *“I hadn't thought about impact on others before”*. Specialists also agreed that the pen portraits worked well. One commented *“It's hard to think about specific applications and the pen portraits helped to bring to life situations different from their own – a good way of doing it”*. However, repeating the exercise in exactly the same way became repetitive and, as a result, discussions in some small groups lulled later in the afternoon. A few participants reported that there were too many pen portraits to consider. Mixing up the approach with some less sedentary techniques, role play or mixing up groups might have helped to keep discussions lively and all participants fully engaged.

**Solutions case studies were interesting but complex.** During the second set of workshops we observed, and several contributing specialists also commented, that the presentation of the real-life solutions was a bit rushed and the solutions were sometimes hard for participants to grasp. The piloting of these materials had focused on language and accessibility but did not have time to test the way in which the questions were asked. As with the pen portraits, the solutions case studies repeatedly used the same technique in each iteration and became a bit repetitive. At each small table group participants only looked at a sub-set of solutions, so it appeared that not all solutions were getting full attention. However, across the seven locations each solution was considered by enough small table groups to provide sufficient data for reporting on preferences and trade-offs in the final report.

### **6.1.3 Allowing participants to hear from a range of specialists and get their questions answered**

As the design for the workshops was adapted and additional locations were added it became increasingly clear that it would be a challenge to get a balance of online targeting and data ethicist specialists to every location and every workshop. Both CDEI and Ipsos MORI put in considerable effort to getting commitments from oversight group members and stakeholders who had shown an interest in taking part. However, the combination of number of events, location and timing meant that some locations proved difficult to recruit for and some specialists dropped out at the last minute. Anticipating these difficulties, the contractors had recorded talking heads videos with a handful of specialists, and collated different viewpoints on how harms could be addressed through handouts of statements from different ‘talking heads’ stakeholders. CDEI and ICO between them ensured that at least one specialist was available to answer questions at each workshop.

Specialists that did attend were briefed in advance and invited to answer participants' technical, regulatory and data ethics questions. They were also invited to sit in on discussions and occasionally feed in supportive challenge and questions for the group when invited to do so by the facilitators. Participants were generally positive about the role that specialists played, and the talking heads videos were praised as a useful introduction to the issues. Participants were almost unanimous in feeling that the specialists in the room were helpful in answering their questions in a way that was easy to understand, and the information shared by specialists was seen as a successful element of the process. We observed that most of the specialists that contributed were happy in their role of answering questions when called upon to do so by the facilitators. However, a few academic specialists strayed into sharing their opinions in a way that was not necessarily helpful for the discussions, illustrating the need for both written and verbal briefing before and during the day.

- 96.5% of participants responding to the feedback question (142) reported that the specialists in the room had been helpful in answering questions in a way that was easy to understand.
- All 136 who answered the question after day two felt that information provided by specialists had been a very successful element of the workshops.

### **Lessons learnt:**

Overall the design and information met most Sciencewise best practice principles. Given the broad scope of the framing of the dialogue the temptation was to keep adding more applications, solutions and questions.

- Experienced contractors managed to strike a fine balance in the amount of information provided to participants without overwhelming them.
- Some sessions which had to cover a large number of similar scenarios – such as pen portraits and solutions – would have benefited from using a variety of techniques (less sedentary, more active, different group sizes) in order to keep all participants fully engaged.
- Plenary sessions such as the washing line and feedback on solutions and trade-offs worked well as opportunities for all to hear what others were thinking and to probe the values and underlying principles that underlay. Other tools for sharing feedback such as eVoting might also have added variety rather than always relying on table facilitators to feedback.
- The team anticipated and managed to mitigate the challenges of getting a balance of specialists in the room for all events. A combination of talking heads videos, handouts and representation from CDEI/ICO at almost all events meant that participants felt they had heard from specialists.



## 7. SATISFACTION AND IMPACT ON PARTICIPANTS

This section presents the findings on participant satisfaction (*Section 7.1*) and the impact the dialogue has had on participants (*Section 7.2*). This is based on the following evidence:

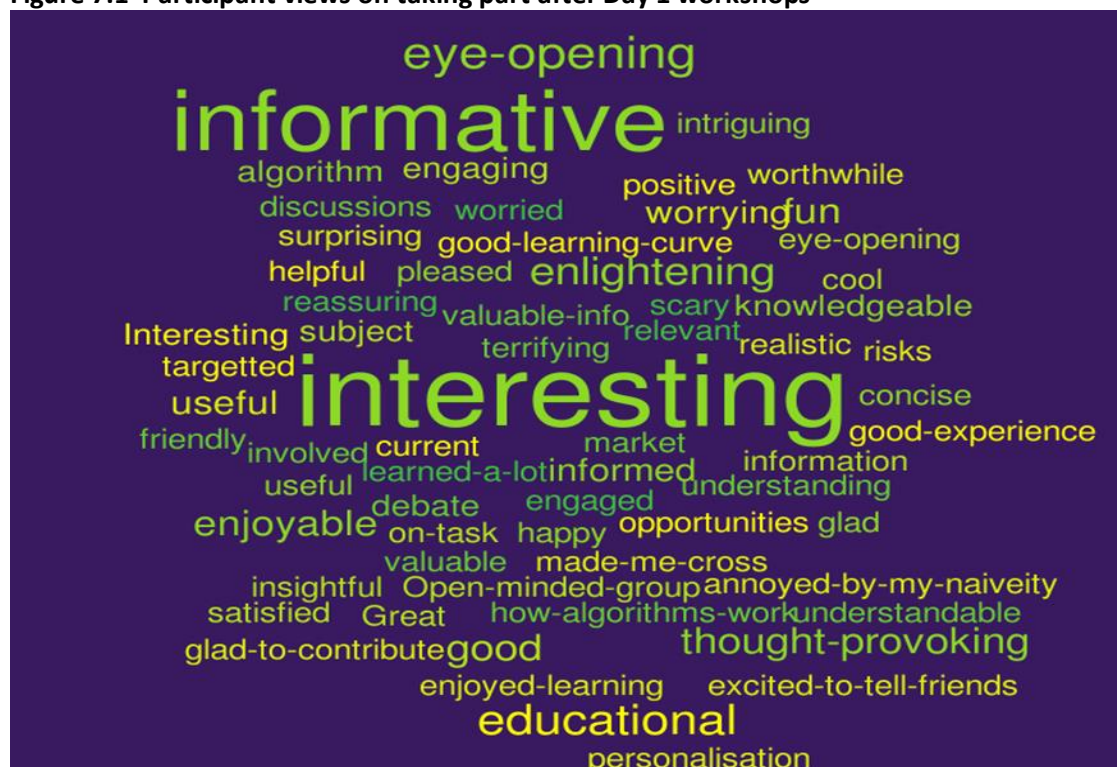
- Quantitative data collection in participant feedback questionnaires on how their knowledge developed over the two workshops; and
- Informal discussions during both rounds of workshops, examples from homework diaries and Ipsos MORI vox pops on what participants had learnt and their evolving attitudes towards online targeting and how harms could be minimised while retaining the benefits.

By the end of day one participants reported that they had really enjoyed the sessions and almost everybody agreed that they had learnt a lot about personalisation and algorithms. Many described the day as interesting and enjoyable, and also eye-opening, thought-provoking, enlightening and even terrifying. By the end of the second workshops all but a small minority (5%) felt they either knew a lot or a fair amount about the different benefits, harms and potential solutions to achieving the changes they wanted to see in online targeting. Almost all participants really enjoyed taking part, felt it was important for the public to be involved in such discussions and felt confident that CDEI would take their views into account in drawing up its recommendations to the Government. The vast majority of participants would be happy to get involved in a public dialogue again in the future. There may be an opportunity for CDEI to go back to a smaller group of participants to provide a sounding board for their future work.

### 7.1 PARTICIPANT SATISFACTION

Participant comments on their satisfaction with the process are summarised in *Box 7.1* while the Word Cloud shown in *Figure 7.1* summarises their feelings about being involved in the process.

**Figure 7.1 Participant views on taking part after Day 1 workshops**



### Box 7.1 Participant feedback on their satisfaction with the public dialogue

- 98% (140 out of 143 respondents after the first workshops) felt that they had been able to contribute their views and have their say.
- 95% (137 out of 144 respondents after the first workshop) felt that they had learnt something new by the end of the first workshops. Many reported that they had been surprised (and many alarmed or even terrified) to learn how personalisation worked, what data was being collected about them and how pervasive personalisation was.
- By the end of the second workshops participants were very enthusiastic about the overall experience with 99% (132 of the 133 who answered the question) agreeing that, overall, they had enjoyed taking part.

## 7.2 PERSONALISATION AND THE PARTICIPANT LEARNING JOURNEY

Almost all participants experienced a steep learning journey over the two workshop sessions. They assessed their level of knowledge before taking part in the workshops and then at the end of the second set of workshops. Almost all participants felt that they had started from a very low base of knowledge (despite 57% being identified as tech savvy during the recruitment process). Looking back at the end of the process only 4% of participants (6 of 137 answering the question) considered that they had actually known a lot about online targeting at the start: 37% (51) felt they knew a fair amount while 58% (80) considered they knew very little.

By the end of the second set of workshops only 7 or 8 individuals (5-6%) still felt they knew very little: almost all other participants had increased their knowledge so that they now felt they knew a fair amount or a lot. Participants tended to feel they had learnt quite a lot about the possible benefits and harms of using online targeting for individuals and for society. They told us they had learnt how personalisation works, how sophisticated it is and the extent to which their personal data was being collected, stored and used through social media. Some were shocked by the amount of personal data they were providing – for free - to internet companies. Many people were interested to learn about the role of algorithms. Many also reflected that thinking about the potential impact on vulnerable people had been particularly interesting. A few participants suggested that what they had learnt would really change the way they used the internet. For instance, one participant in Cardiff reported that *“I can't believe how much I have learnt ... and how much I have taken from it to apply to my personal life”* (participant, Cardiff) while another from Leeds reported that *“It will change the way I browse the internet”*. Most of the small minority of participants that did not feel their understanding had changed much were in the subgroups for BME and those with mental health issues.

By the end of the second round of workshops a slightly smaller group felt confident that they fully understood the potential solutions. Although the follow up depth interviews with a handful of participants suggested that none had tried to change their online privacy settings. The majority of participants felt that it is important to consult the public on such issues and felt confident that their inputs would inform CDEI's advice to the Government. Several commented on how pleased they were to have been involved in government decision-making in this area. *“I am glad to contribute to government policy”*. As a result of their positive experiences, about 95% of participants reported that they would get involved in these kinds of events in the future. A participant from Southampton reported that: *“I enjoyed the whole workshop immensely. Would love to do another”*.



### Box 7.2 Participant reflections on their learning journey and their role in the policy process

- **Understanding the possible benefits of personalisation:** 46.7% (63) felt they knew a lot, 47.4% (64) felt they knew a fair amount – only 5.9% (8) still felt they knew a little.
- **Understanding of the possible harms of personalisation:** 50.7% (69) felt they knew a lot, 43.4% (59) felt they knew a fair bit – only 5.9% (8) felt they still knew a little.
- **The best solutions for making sure that we get the most benefits while limiting the harms of personalisation:** 38.1% (51) knew a lot, 56.7% (76) knew a fair bit – 5.2% (7) still knew only a little.
- Almost all of the 131 participants who answered the question at the end of day two felt that it had been important to consult the public on these issues (97%, 127).
- The vast majority (92.5%, 125 of 135 respondents) felt confident that these events would help inform CDEI in its advice to government about what can be done to maximise benefits and minimise harms of online personalisation (6.4%, 87 strongly agreed and 28.1%, 38 tended to agree). The ten individuals who were more sceptical about how much their opinions would influence CDEI, and ultimately government, were mainly from the Tamworth (4) and Cardiff (3) workshops.

### Lessons learnt:

- Many participants reported they would be happy to continue being involved and gave permission to be re-contacted. This pool of informed and willing members of the public is a resource that CDEI could go back to as a sounding board for future research and recommendations.

## 8. COSTS AND BENEFITS OF THE DIALOGUE

This section presents findings on the relative costs and benefits of the dialogue. The findings are based on evaluation interviews with CDEI, Ipsos MORI and oversight group members and comparison of the costs with any potential economic benefits which might result.

**The financial budget, including the independent valuation and an extension to cover a follow quantitative survey was about £236.7k. Sciencewise contributed 59% of the overall costs. In addition, CDEI, oversight group members and stakeholders invested an estimated additional £100k of time in-kind.**

**It is too early to identify and value the economic benefits of the public dialogue, but it seems likely that the recommendations will chime with policy solutions that government is currently considering to protect individuals and the wider economy from potential harms of online targeting, while ensuring that the digital online sector continues to make a major contribution to the UK economy. The research findings could also help to reduce costs by encouraging proportionate regulation and avoiding duplicative or over-regulation. In addition, recommendations which are taken on board by the internet industry to develop their own Codes of Conduct and to empower users to take control of their own privacy settings or online advertising preferences could help to reduce the costs of regulation.**

### 8.1 COSTS

#### 8.1.1 Financial costs

The total cash costs for the public dialogue delivery, evaluation and additional quantitative work was £236.7k. Sciencewise provided £128.2k of the total financial cost (59.1%) and the CDEI provided £108.5k (of which £19.7k was for a contract extension to cover quantitative survey work with 2,200 members of the public, which was met entirely by the CDEI). In addition, the CDEI made provision for £30k of in-kind support and directly commissioned a literature review equivalent to £10k.

The original proposal was based on three large groups of up to 150 participants in three locations. During the scoping stage the core management team agreed to reallocate resources to allow for reduction in size of the large groups (about 30 each) and for four additional small subgroups (12-20 each) in Southampton, Leeds, Newcastle and Falkirk in response to findings from the literature review and advice from the oversight group and stakeholder workshop. The budget covered participant recruitment, incentive payments, hire of venues, food and facilitator team travel and subsistence. A necessary compromise to cover the additional locations within the agreed budget, was that the smaller workshops would be half the length of the larger workshops (three hours each on two weekday evenings).

The budget also included provision for stakeholder engagement, meetings to share the findings and a £6,000 license fee for an app and transcription of participants' video diaries. The budget also included a contingency for a handful of follow-up depth interviews with individual participants to pick up on any issues not fully covered in the public workshops. Follow up interviews proved time consuming to arrange (requiring calls to more than 20 individuals in order to secure five interviews). This low response rate may partly have been affected by the elapsed time (about three months) between the workshops and follow up calls.

Commissioning the quantitative survey within the Sciencewise framework contract provided good value for money, helping to reduce overhead costs (procurement costs and time taken for a contractor to understand CDEI's objectives and how to communicate online targeting to the public) and at

competitive fee rates compared to commissioning a standalone piece of work. The survey results were incorporated in the final report and added an extra layer of analysis for CDEI.

The contractors managed to deliver all the required elements within the agreed budget through a combination of factors: fielding a mixed-seniority team of facilitators and locally recruited note-takers and facilitators for the workshops; a small senior team involved in final reporting; and great flexibility in reallocating resources between tasks. The complexity of the project required significant senior staff inputs during the scoping and design stage. Regular weekly progress meetings over a lengthy project and many iterations of the final report (about seven versions compared to three drafts budgeted for) meant that project management costs for contractors have probably not been fully covered in the financial budget.

### **8.1.2 In-kind contributions**

CDEI estimates that their time inputs were equivalent to one full time equivalent (FTE) post over a year spread across 4-5 staff who were deeply involved at different points. Tasks included drafting of the initial business case through procurement, convening of the oversight group, recruitment of stakeholders and specialists, attending workshops as specialists, inputting to the workshop design and stimulus materials and reviewing project outputs. This also included time for drafting the CDEI review report and disseminating the research findings.

The oversight group organisations also contributed about 20 person days of time. Most members read preparatory materials, attended two of three meetings and reviewed stimulus materials and the final report, equivalent to about 10 hours per member. A few members (and their colleagues) such as ICO spent considerably more time, fielding specialists for six of the 14 workshops. A few oversight group members also attended the launch event and have since spent time disseminating findings by social media or briefing colleagues. No oversight group members received honoraria. Most oversight group members interviewed reported that the time they put in was commensurate with the benefits of the project: organisations such as ICO that invested a lot of time reported that they got some benefits in terms of organisational learning.

Finally, stakeholder organisations, including NGOs and academics contributed about 10 days of time in attending the stakeholder workshop and participating in dialogue workshops as specialists.

A very approximate valuation of in-kind inputs, based on an average opportunity cost of £350/day for a long term post and £500 per person day for specialist inputs suggests that in-kind contributions have been just under £100k, equivalent to about an additional 40-45% on top of the financial costs of the total project.

## **8.2 BENEFITS**

It is too early to identify and value the economic benefits of this public dialogue and how the findings have informed the CDEI's advice to government and its impact on policy. However, it is clear that the findings are timely and could make a valuable contribution to ongoing policy discussions about how to improve competition and transparency in the online advertising sector, in improving the efficiency of delivery of public sector services, such as health and social care advice and in feeding into proposals for regulation of online harms.

Digital advertising plays an important role in eCommerce and in the delivery of online services and content, including internet search, social media and news journalism. Typically, consumers do not pay directly for these services, rather platforms and content publishers earn revenues by using consumers'

attention and data to sell targeted digital advertising<sup>8</sup>. As the primary source of revenue for major online platforms, digital advertising spend has almost quadrupled in size since 2008 to reach an estimated £13.4 billion in 2018. The UK digital market is the third largest in the world.

As part of its Digital Markets Strategy, the Competition and Markets Authority (CMA) has launched a market study into online platforms and the digital advertising market in the UK<sup>9</sup>. The study shows that two platforms - Google (including YouTube) and Facebook (including Instagram and WhatsApp) – attract over a third of UK internet users’ time spent online and dominate the major digital advertising sectors. Google dominates the £6 billion search advertising market in UK with an estimated 90% share while Facebook has almost half of the £5 billion display advertising market. Both companies are highly profitable, have enjoyed market growth rates well in excess of 10% pa, and are major contributors to the UK economy.

UK government wishes to see the digital advertising sector continuing to make a positive contribution to the UK economy but is simultaneously exploring measures to limit potential online harms and encourage competition in the market which keeps prices competitive, ensures that valuable online services (such as newspapers) are not lost, and that individuals are not forced to give up more data than they are comfortable with. The CMA is considering a range of potential solutions including: a code of conduct to govern the behaviour of platforms; rules to give consumers greater control over their data; and interventions to help curb the power of the largest players (such as measures to increase interoperability).

It is not yet clear how CDEI’s recommendations will be received by the Government and the internet industry. However, in providing robust evidence that informed members of the public would like to see change and greater protections in how their data is collected and used, the research could help strengthen the case for the role of an independent regulator, the development of an industry-led Code of Conduct for online advertisers and greater user empowerment. The research findings could help to reduce costs by encouraging proportionate regulation and avoiding duplicative or over-regulation. The message that users would like to be able to control their own privacy and personalised advert settings through access to simpler terms and conditions, simpler navigation through settings menus and interoperable controls between social media platforms and search platforms may encourage the internet industry to develop its own Code of Practice and improve controls for users in preference to more costly regulation.

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<sup>8</sup> Based on Google’s submissions in relation to its UK search advertising revenue, CMA has estimated that Google earns about £100 per individual user from its UK search advertising.

<sup>9</sup> [www.gov.uk/cma-cases/online-platforms-and-digital-advertising-market-study](http://www.gov.uk/cma-cases/online-platforms-and-digital-advertising-market-study)

## 9. OVERALL FINDINGS AND LESSONS LEARNT

This section summarises the overall findings on what worked well and what might have been done differently based on the independent evaluation and the findings of the end of project wash-up meeting.

**This has been a large, complex dialogue with many different elements, including large and smaller subgroups of participants, supplemented with follow-on depth interviews and a quantitative survey of 2,200 members of the public. An experienced contractor delivered a high-quality public dialogue with innovative elements, within budget. The dialogue findings were timely in feeding into CDEI's recommendations to government. CDEI's own report is likely to have significant policy impacts in an area where government is actively considering how to retain the economic benefits of use of online targeting while minimising potential harms to individuals and society as a whole. The dialogue findings will also help to inform ongoing qualitative research in related online data areas. Due to the number of CDEI staff who gained experience in the project management of this public dialogue, CDEI now seems well placed to commission and project manage smaller, more tightly defined public dialogues without the need for further Sciencewise support.**

The evaluation has highlighted a number of lessons for future public dialogues. Recommendations for Sciencewise, commissioners and contractors are summarised in *Table 9.1* and below:

- **Literature review.** A commissioner-led review worked well to help frame the dialogue and ensure the design addressed current gaps in knowledge positioning the commissioners to lead in developing technical content while allowing contractors more time for process design and producing accessible stimulus materials. Ideally commissioner-led reviews should be completed before the inception stage.
- **Oversight group.** A medium sized, fully representative group increased confidence of industry representatives that the dialogue would be objective, balanced and robust. The group made valuable inputs in ensuring that potentially vulnerable subgroups were covered and that the information and language were balanced and accurate. In future, Sciencewise could guide commissioners on setting the expectation that oversight group members will also participate in dialogue workshops. It can also advise on how to keep members engaged over an extended project lifetime, and how to maximise policy and research impacts by agreeing dissemination roles.
- **Subgroups with vulnerable people or those likely to have markedly different opinions were a particular strength of this dialogue.** Where subgroups are included in future designs the commissioners and contractors should consider whether tailoring workshop design and the stimulus materials for specific subgroups would yield richer findings and help surface more examples of lived experience.
- **Mix of techniques and materials.** The broad scope of the dialogue and the large number of technical applications and solutions to be considered presented a challenge for this dialogue. The materials developed worked but contractors should try to use a mix of different approaches so that exercises do not become repetitive and participants do not become disengaged.

- **Challenges in getting specialist representation at all workshops were well anticipated and planned for** through a combination of pre-recorded talking heads videos, handouts and the presence of the commissioners or close collaborators at almost all events. Sciencewise should provide guidance where there are likely to be challenges and commissioners and contractors should agree how to leverage their networks to best effect.
- **Institutionalising experience of running public dialogues in the commissioning body.** In order to ensure lessons learnt are embedded in commissioning organisations it would be helpful to run an internal ‘wash-up’ session. This process could be supported by the independent evaluator if required.
- **Ongoing involvement of informed participants.** Many participants reported they would be happy to continue being involved in public dialogue in this area and gave permission to be re-contacted. This pool of informed and willing members of the public is a resource that commissioners could go back to as a standing panel/sounding board for testing future policy and research recommendations.

**Table 9.1: Recommendations for how lessons learnt can be reflected in future public dialogues**

	Sciencewise	Commissioners	Contractors
<b>Procurement</b>	<ul style="list-style-type: none"> <li>• Allow for preliminary talks between commissioners and potential contractors and allow flexibility for options</li> </ul>	<ul style="list-style-type: none"> <li>• Invite contractors to suggest options and variations (# locations, size of groups, number of times reconvened, quantitative research etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• Freedom to propose variations and options e.g. for involving hard-to-reach or potentially vulnerable groups</li> </ul>
<b>Framing and design</b>	<ul style="list-style-type: none"> <li>• Advice on pros and cons of commissioner or contractor-led lit reviews</li> </ul>	<ul style="list-style-type: none"> <li>• If literature review is independently commissioned, ensure it is available to contractors at inception meeting</li> <li>• Early agreement on specific objectives for days 1 and days 2 (and sessions within) them and timetable for developing stimulus materials including a design session, piloting (ideally before each round) and sign off</li> </ul>	<ul style="list-style-type: none"> <li>• Flexibility to change design based on lit review, OG and stakeholder inputs</li> </ul>
<b>Stimulus materials</b>		<ul style="list-style-type: none"> <li>• Resist scope creep, last minute additions</li> <li>• Mix up techniques, avoid over-reliance on table-based or repetitive tasks</li> <li>• Test how questions are asked, not just if materials are accessible and balanced</li> </ul>	
<b>Involving specialists</b>	<ul style="list-style-type: none"> <li>• Highlight recruiting specialists as a time-consuming task to be started early as possible</li> <li>• Guidance on how to secure early buy-in from OG/ stake-</li> </ul>	<ul style="list-style-type: none"> <li>• Secure buy-in of specialists at the earliest stage – set expectation that OG / Stakeholders will contribute to workshops and that it will involve weekend travel</li> <li>• Agree who and how best to leverage relationships</li> <li>• Try and ensure commissioners (or close partners) attend all public workshops</li> <li>• Make contingencies for filling gaps – e.g. live remote presentations (Zoom, Skype etc.) videos &amp; handouts, Frequently Asked Questions (FAQs) - across all meetings</li> </ul>	

	Sciencewise	Commissioners	Contractors
	holders as specialists		
<b>Project management</b>	<ul style="list-style-type: none"> <li>Realistic budgets to allow for contractors to hold regular progress meetings</li> </ul>	<ul style="list-style-type: none"> <li>Recognise that PM role can take up to 1 FTE over project duration</li> <li>Designate one focal point of contact</li> </ul>	<ul style="list-style-type: none"> <li>Allow for weekly progress meetings throughout project</li> </ul>
<b>Oversight Group &amp; stakeholders</b>	<ul style="list-style-type: none"> <li>Guidance on how to keep an OG fully engaged over a long process</li> </ul>	<ul style="list-style-type: none"> <li>Agree whether commissioners or contractors best placed to lead on engaging with OG or stakeholders respectively</li> <li>Maintain regular communications as outputs produced including roles for disseminating findings and reaching different audiences .</li> </ul>	
<b>Final report drafting</b>	<ul style="list-style-type: none"> <li>Working session with core team after initial analysis /coding by contractors so that findings are presented in a policy-friendly format</li> <li>Rationalise process for feeding in and responding to comments to reduce number of drafts</li> </ul>		
<b>Embedding Learning</b>		<ul style="list-style-type: none"> <li>Internal reflections on future opportunities for PD, skills developed &amp; any gaps, and best practice lessons learnt, assisted by evaluator if required</li> </ul>	
<b>Maximising policy &amp; research impact</b>		<ul style="list-style-type: none"> <li>Define OG roles in disseminating findings</li> <li>Consider using pool of willing participants as a future resource to go back as a sounding board</li> </ul>	

## Annex A: Oversight Group Members

Participants	Organisation
Harriet Pickles	Which?
Anya Skatova	Alan Turing Institute
Adrian Weller/ Jen Boon	CDEI Targeting Review Steering Group
Reema Patel	Ada Lovelace Institute of the Nuffield Foundation
Katherine Mayes	TechUK
Carl Wiper	Information Commissioner's Office (ICO)
Oscar Tapp-Scotting	Department Culture Media and Sports (DCMS) Security and Online Harms Team
Jacob Ohrvik-Stott	Doteveryone
Christie Dennehy-Neil	Internet Advertising Bureau (IAB)
Olivier Thereaux	Open Data Institute

## Participants in Stakeholder workshop

Participants	Organisation
Jay Harman	5Rights
Christie Dennehy-Neil	IAB UK
Malcolm Phillips	ASA/CAP
Eliot Bendinelli	Privacy International
Jon Hatfield	Shpock
Tom Miller	Facebook
Alexander Kallman	Gamble Aware
Julie Hamshire	GrapM
Chia Seiler	Ofcom
Reema Patel	Ada Lovelace Institute
Katie Evans	Money and Mental Health



## Annex B: Summary of evaluation feedback from dialogue workshops (7 locations and 14 workshops)

First round workshops		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	Total
1	The recruitment <b>process and advance details</b> for the event were well-handled	92	47	4	0	0	143
	Percentage	64.3	32.9	2.8	0.0	0.0	100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
2	I am aware of and understand the <b>objectives of these workshops</b>	104	38	1	0	0	143
	Percentage	72.7	26.6	0.7	0.0	0.0	100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
3	I was given <b>enough, clear information</b> on personalisation of online products to enable me to contribute to the discussions	107	35	1	1	0	144
	Percentage	74.3	24.3	0.7	0.7	0.0	100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
4	I felt that the information provided was <b>fair and balanced</b>	101	39	3	1	0	144
	Percentage	70.1	27.1	2.1	0.7	0.0	100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
5	The pen portrait scenarios were helpful in helping me think about both <b>benefits and potential harms of personalisation</b>	92	46	4	0	0	142
	Percentage	64.8	32.4	2.8	0.0	0.0	100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
6	<b>There was enough time</b> to take in the information and discuss the issues	78	58	5	2	0	143
	Percentage	54.5	40.6	3.5	1.4	0.0	100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
7	The <b>specialists in the room</b> were helpful in answering questions in a way that was easy to understand	118	19	5	0	0	142
	Percentage	83.1	13.4	3.5	0.0	0.0	100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
8	I was able to <b>contribute</b> my views and have my say	104	36	3	0	0	143
	Percentage	72.7	25.2	2.1	0.0	0.0	100.0

		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
9	I learned something new about personalisation of online data as a result of taking part today	111	26	1	5	1	144
	Percentage	77.1	18.1	0.7	3.5	0.7	100.0

Second round of workshops		worked very well	worked quite well	Neither	Didn't work that well	Didn't work well at all	Total
1	How successful do you feel different aspects of the events have been?						
	Information shared by specialists	91	45	0	0	0	136
	%	67	33	0	0	0	100
	Information I collected myself (through the video or written diary homework)	37	46	16	9	0	108
	%	34	43	15	8	0	100
	Amount of time available	78	54	2	1	1	136
	%	57	40	1	1	1	100
	How the sessions were organised	94	41	1	1	0	137
	%	69	30	1	1	0	100
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
2	The <b>facilitation</b> has been independent, professional and effective	102	34	0	0	0	136
	%	75	25	0	0	0	100
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
3	All <b>participants</b> were treated equally and respectfully	119	16	1	1	0	137
	%	87	12	1	1	0	100
		I knew a lot	I knew a fair amount	I knew very little			
4	How much do you feel <b>you knew about personalisation online before</b> these events?	6	51	80			137
	%	4.4	37.2	58.4			100.0
5	How much do you feel <b>you now know</b> about the following?	I know a lot	I know a fair amount	I know very little			
	– The <b>possible benefits</b> of using online personalisation for individuals and for society.	63	64	8	0	0	135
	%	46.7	47.4	5.9			100.0
	– The <b>possible harms</b> of using online personalisation for individuals and for society?	69	59	8	0	0	136

	%	50.7	43.4	5.9			100.0
	– <b>What the best solutions might be</b> for making sure that we get the most benefits, while limiting the harms of personalisation.	51	76	7	0	0	134
	%	38.1	56.7	5.2			100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
<b>6</b>	I feel it is <b>important to consult the public</b> on these issues	104	23	2	2	0	131
	%	79.4	17.6	1.5	1.5	0.0	100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
<b>7</b>	I am confident that these events will <b>help inform CDEI</b> in its advice to government about what can be done to maximise benefits and minimise harms of online personalisation.	87	38	10	0	0	135
	%	64.4	28.1	7.4	0.0	0.0	100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
<b>8</b>	Overall I <b>enjoyed taking part</b>	101	31	1	0	0	133
	%	75.9	23.3	0.8	0.0	0.0	100.0
		strongly agree	tend to agree	neither	tend to disagree	strongly disagree	
<b>9</b>	I am likely to <b>get involved</b> in these kinds of events in future	105	19	5	2	0	131
	%	80.2	14.5	3.8	1.5	0.0	100.0