



Origins Code of Conduct

Introduction

Origins is a system which infers the most likely heritage of the bearer of any combination of personal and family name, whether in terms of ethnicity, religion, culture or the interaction of all three.

The classifications used by Origins will often correspond with those which questionnaire respondents choose to identify themselves, but it is important to understand that the two measurement systems are not measuring precisely the same attributes.

Thus, whereas self-identification describes the group that a person feels he or she currently belongs to, or even aspires to belong to, Origins is indicative of the culture of a person's forebears.

In other words, Origins offers categories indicative of habitual, often unconscious or unprompted, behaviours influenced by family and tradition, whilst self-identification indicates the aspirational, usually conscious, identity sought by subjects.

The former correlates more closely with our underlying behaviours and preferences and tends not to vary over time. The latter corresponds with how we would prefer others to see us. Recent research comparing the last two censuses shows that in some groups up to 20% of individuals changed their classification between 2001 and 2011.

It is important that users are able to explain the reasons for this difference in the not unlikely event that questions are asked about the accuracy of the Origins classification.

The principal purposes of Origins are to enable organisations to:

- a) better understand the needs and preferences of different ethno-cultural groupings
- b) improve the appropriateness of their communication with members of minority groups, whether by making them more aware of products and services which they are particularly likely to consume or by communicating with them in a manner which they are likely to find appropriate.

Origins should therefore only be used to develop communication campaigns which improve the delivery of services sought by members of the communities to which they are targeted.

Given the sensitivities surrounding the use of information relating to ethnic origin and religion and to ensure that these objectives are met, a condition of the supply of Origins software and the coding of customer files by Origins is that users should accept the provisions of the following Code of Conduct.

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February 2019

1: The uses to which Origins will be put will comply with UK legislation, specifically the provisions of the Equality Act 2010 and the General Data Protection Regulation 2016/679 (GDPR) which came into force on 25 May 2018. Please refer to Webber Phillips FAQ 11 on GDPR with regards to this.

2: Users will take care to avoid giving the impression that any Origins codes held on their customer or citizen databases have been obtained other than by inference. In particular, they will avoid giving the impression that these codes are derived from personal information that consumers have divulged, whether to themselves or third parties, or that a person's ethno-cultural identity has been obtained from public sources, the census or research surveys.

3: When disseminating the results of analysis of behaviours or opinion cross tabulated by Origins, users will take care to avoid giving the impression that the categories necessarily match the ones with which consumers would have self-identified had they had the opportunity to do so, or that the categories are necessarily 100% accurate (assuming that there is always an accurate answer to an ethnicity question). In other words, ethnic or religious self-identification and ethno-cultural background are different aspects of a person's identity.

4: Where measures of behaviour are cross tabulated by Origins to target the promotion of specific products and services, or for other marketing purposes, users will apply the targeting system only to products with which specific communities have a particular affinity or cultural aversion (for example, targeting a banking product specifically designed to meet the needs of a particular cultural group, or avoiding promoting pork products to Muslims). Users will not use the system to deselect customers, prospects or citizens from the communication of products or services which are relevant to all communities merely on the grounds that previous communications campaigns have demonstrated low levels of take-up among that community or low levels of usage (for example, excluding Iranians from a mailshot to promote car insurance, or deselecting Somalis from a credit card promotion on the grounds that their average balance is low).

5: Users will not use Origins as an input to credit risk assessment or for adjusting insurance premiums for specific policyholders or prospective policyholders.

6: Origins will not be used other than in applications that can be justified on the basis of statistical evidence. In other words, targeting must be evidence-based and not based on stereotypes.

7: Users will not use Origins to drive communications which imply that an individual person's ethno-cultural background, religion or language is necessarily known as a result of Origins (for example, addressing them exclusively in Spanish).

8: Users will not use defamatory or inflammatory language or imagery in communication programmes targeted on the basis of Origins.