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10 Questions to Consider When Using AI in the Research Process

Responsible and transparent use of AI in market, opinion and social research and data analytics

How this document fits

This document replaces part of Esomar's existing 20 Questions to Help Buyers of AI-Based Services for Market Research and Insights. It provides an introductory framework for considering material uses of AI across the research process. It sits alongside a separate buyer checklist, the Esomar AI Glossary, and the **Companion Guide on Using Research Data to Develop and Improve AI**.

It is not intended to be a complete solution for every AI application. More detailed ICC/Esomar Code Applied guidance is being developed for synthetic data, research design, data collection, analysis, and the internal use of AI by research organisations and insight teams.

Purpose and audience

This guidance is for researchers, clients, suppliers, platforms, internal insight teams, self-service users and others involved in any part of market, opinion and social research or data analytics. It applies whether AI is supplied by an external provider, embedded in an established platform, or developed and operated within the organisation.

The questions should be applied proportionately. A routine drafting aid does not require the same controls as an AI interviewer, an automated analytical system, a synthetic sample or an interactive client-facing agent. Materiality, sensitivity, the degree of automation, participant impact, and the consequences of error should guide the level of review and documentation.

Relationship to the ICC/Esomar Code

These questions should be read alongside the ICC/Esomar International Code on Market, Opinion and Social Research and Data Analytics. Where the Code imposes a requirement, this document supports its application and does not amend or replace it. The Code applies to all parties according to their activities, expertise, influence and control, including clients and users of self-service platforms.

Use of research data to develop or improve AI systems

Research data, client materials and research outputs should not be used to train, test or improve an AI system unless the researcher has established that the use is consistent with the information and permissions given to data subjects, the agreement with the client, applicable law, contractual and intellectual property restrictions, and commitments made by upstream suppliers. A party cannot grant rights that it does not hold; for example, a research agency could not grant permission to a platform to use the data if that permission is inconsistent with the permission given to the agency by the research participants.

Anonymising personal data does not by itself remove obligations relating to client confidentiality, intellectual property or agreed restrictions on use. The **Companion Guide on Using Research Data to Develop and Improve AI** provides further guidance.

The 10 buyer questions at a glance

No.	Question
1	Why is AI being used, and is it appropriate and fit for the research purpose?
2	Where in the research process will AI be used?
3	Who is responsible for each use of AI?
4	What data, materials and outputs will AI access, use, retain or create?
5	Are the permissions, lawful grounds and contracts sufficient?
6	Will research data or outputs be used to develop or improve AI systems?
7	What will participants, clients and other stakeholders be told?
8	How will privacy, confidentiality, security and re-identification risks be managed?
9	How will AI outputs be checked for quality, fairness and fitness for purpose?
10	How will AI use be documented, reviewed, disclosed and corrected?

1. Why is AI being used, and is it appropriate and fit for the research purpose?

Why this matters: AI should be used where it supports research that is fit for purpose and meets the quality agreed with the client, not simply because the technology is available.

Points to consider

- Define the research purpose and the role AI is expected to play.
- Consider whether the AI approach, alone or alongside a non-AI approach, can meet the required standard of quality and validity.
- Identify the expected benefit, such as improved access, speed, consistency, coverage or analytical capability.
- Consider whether the use could affect the integrity, transparency or public credibility of the research.
- Identify higher-risk uses that require senior, methodological, legal, privacy, security or ethics review.

Code connection: Article 7 requires research to be fit for purpose, appropriate for the target population and transparent about limitations.

2. Where in the research process will AI be used?

Why this matters: AI may be present in tools and platforms without being obvious. Identifying material uses across the lifecycle helps prevent unexamined or accidental use.

Points to consider

- Identify material uses in research design, recruitment, fieldwork, moderation, data preparation, analysis, reporting, publication and later reuse.
- Include uses by clients, researchers, internal teams, suppliers, platforms and subcontractors.
- Distinguish low-risk support uses from uses that affect participants, data quality, findings or decisions.
- Identify whether the output is a fixed deliverable or an interactive system that will continue producing outputs after handover.
- Revisit the assessment when tools, models, methods, suppliers or intended uses change.

3. Who is responsible for each use of AI?

Why this matters: The research process is often fragmented. Responsibility and authority need to be clear, even when several organisations or systems contribute to the work.

Points to consider

- Identify who commissions, conducts, supplies, configures, reviews and approves each material AI use.
- Allocate responsibility in line with each party's activities, expertise, influence and control.
- Define who can challenge or override an output, pause the process, correct an error or resolve a dispute.
- Specify the qualifications, authority and level of involvement required of those providing professional oversight.
- Ensure that subcontractors and technology providers are subject to appropriate obligations, and that clients ensure their contractors are aware of the Code.

Code connection: Fundamental Principle 5 and Article 12 allocate responsibility and oversight according to activities, expertise and control.

4. What data, materials and outputs will AI access, use, retain or create?

Why this matters: AI systems may use more than obvious survey responses or transcripts. Inputs, prompts, recordings, metadata, client materials and generated outputs can all carry privacy, confidentiality, quality and intellectual property implications.

Points to consider

- Identify participant data, client data, secondary data, prompts, transcripts, recordings, images, metadata, reference materials and research outputs.
- Establish whether the AI can access, store, retrieve, share, learn from or retain those materials.
- Distinguish observed human data from inferred data, synthetic data and other AI-generated material.
- Identify confidential, commercially sensitive or special-category material requiring additional controls.
- Remember that anonymisation or aggregation may protect participants but does not necessarily remove client confidentiality, contractual or intellectual property restrictions.

Code connection: Articles 3, 6, 7(f) and 8 require data minimisation, secure handling, confidentiality and compliance with intellectual property restrictions.

5. Are the permissions, lawful grounds and contracts sufficient?

Why this matters: AI is a processing technology, and its use does not automatically require a new consent mechanism. However, the purpose, data, parties and consequences of the proposed use must be compatible with the relevant permissions, lawful grounds and contracts.

Points to consider

- Check participant information, privacy notices, consent where required, and any other applicable lawful grounds.
- Confirm that the use is compatible with the original research purpose and was not specifically excluded.
- Check client contracts, data-owner restrictions, platform terms, copyright and other intellectual property rights.
- Identify restrictions imposed by panel providers, recruiters, data suppliers or other upstream parties.
- Record relevant exclusions, withdrawal requests and client-specific limits. Do not imply a general right to opt out of all AI processing where no such right applies.

Code connection: Articles 4 to 6 set requirements for information, consent where applicable, secondary use, withdrawal, privacy and data protection.

6. Will research data or outputs be used to develop or improve AI systems?

Why this matters: Using project materials to improve an AI system is different from using AI to complete the project. The proposed use and who benefits from it should be made explicit.

Points to consider

- State whether participant data, client data, prompts, transcripts, survey data, coded data, reports or synthetic data may be used for AI development, testing, benchmarking or improvement.
- Distinguish use for the current project, a client-specific system, a supplier's shared system, and a general-purpose or third-party model.
- Do not use client materials or project outputs to improve a shared supplier or general-purpose model unless that use has been specifically authorised and contractually controlled.
- Confirm that the party giving permission has the necessary rights and that downstream terms do not exceed those rights.
- Consider minimisation, withdrawal, deletion and re-identification risks, and do not use research data for individual-level non-research action without the separate requirements being met.

Code connection: Articles 5, 6, 8 and 11 require respect for original purpose, restrictions, confidentiality, privacy and intellectual property.

7. What will participants, clients and other stakeholders be told?

Why this matters: Useful transparency helps people understand what matters to them. The required information depends on whether the audience is a participant, client, user of a deliverable or the general public.

Points to consider

- Tell the client when AI is to be used in compiling datasets, analysis, reporting or interpretation, including synthetic data and synthetic personas, and state the extent of human oversight.
- Notify participants at the beginning of the research when a synthetic persona is used for data collection.

- Where participants interact directly with other forms of AI, explain material features in plain language, including how and when a person may monitor or intervene.
- Explain relevant retention, re-contact, withdrawal, amendment and deletion routes.
- When findings are published, disclose significant AI or synthetic methods and the extent of human oversight.

Code connection: Articles 4(a)(ii), 7(e) and 9(b) contain specific disclosure requirements for synthetic personas, client reporting and published findings.

8. How will privacy, confidentiality, security and re-identification risks be managed?

Why this matters: AI can increase the risk of unauthorised disclosure, cross-border transfer, model leakage, deductive disclosure and inferred identification, especially with small samples or linked data.

Points to consider

- Minimise personal data and restrict access to approved, secure and controlled environments.
- Check hosting location, cross-border transfers, retention, deletion, access controls and model-improvement settings.
- Assess whether identities or sensitive attributes could be inferred through small cells, rare characteristics, cross-analysis or combination with public, secondary or client data.
- Protect client-confidential material, trade secrets and intellectual property as distinct from participant privacy.
- Ensure that subcontractors and other recipients maintain equivalent security and data-protection measures.

Code connection: Article 6 expressly addresses inferred identity, deductive disclosure, security, transfers, retention and equivalent protections by third parties.

9. How will AI outputs be checked for quality, fairness and fitness for purpose?

Why this matters: AI outputs may be plausible but wrong, incomplete, biased, culturally inappropriate or unsupported by the evidence. The checks should reflect the claim being made and the consequences of error.

Points to consider

- Check outputs against source data, research objectives, known benchmarks, independent human judgement or an established method.
- Use parallel testing, holdout testing, repeated runs or other independent checks where appropriate.
- Assess representation, accessibility, cultural context, language validity and known, potential or suspected biases.
- Check for fabricated verbatims, unsupported claims, hallucinations, overclaiming, false precision and omitted minority themes.
- Distinguish findings, interpretation, conclusions and recommendations, and revalidate after material system or model changes.

Code connection: Articles 7 and 8 require findings and interpretations to be supported by data, limitations to be disclosed and relevant biases to be identified.

10. How will AI use be documented, reviewed, disclosed and corrected?

Why this matters: Proportionate records support accountability, client confidence, correction and learning. Documentation should be useful and should not become a routine burden unrelated to the risk.

Points to consider

- Retain a proportionate record of the tool, purpose, data categories, material model or configuration information, validation checks and professional review.
- Record important restrictions, known limitations, changes, corrections and decisions to continue, pause or stop use.
- Provide routes for correction, complaint handling, re-analysis or withdrawal where appropriate.
- Notify affected parties when significant changes alter the agreed method, risk or permitted use.
- Scale the documentation to materiality, data sensitivity, participant impact, autonomy and the consequences of error.

Code connection: Articles 7, 9 and 12 require sufficient technical information, documentation for published findings, accountability and compliance throughout the research process.

Related material

- 10 Questions Buyers Should Ask Suppliers of AI-Based Research Services.
- Esomar AI Glossary.
- The Companion Guide on Using Research Data to Develop and Improve AI.
- ICC/Esomar International Code on Market, Opinion and Social Research and Data Analytics, 2025.
- Forthcoming ICC/Esomar Code Applied guidance on synthetic data and other research applications of AI.

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