Forward

The world of market research continues to rapidly evolve. CASRO expects this trend to continue and sees our industry’s metamorphosis as a challenge but also as a unique opportunity for our membership. Innovation is at the core of the change: new tools and techniques are being continually introduced; creativity and entrepreneurship are invigorating our industry; and new and different business prospects are ahead of us. This is an environment which we must embrace.

Our industry has high regard for and commitment to a set of rigorous research ethical and business standards as embodied in our Code of Standards and Ethics. With the advent of social media research, many of our members have requested that CASRO issue a set of guidelines that will address the associated ethical and pragmatic issues, as well as maintain research integrity and our industry’s continued self regulation. The guidelines that follow are the product of many thoughtful and often intense discussions, writing, and re-writing by and among a team of dedicated professionals with strong, relevant experience. Our task force also worked in cooperation and consultation with our colleagues in ESOMAR.

We see it as essential to recognize two key points. First, these are guidelines issued for use by our members and the industry during these early days of social media research. These are not mandated standards. It is our considered opinion that the discipline of social media research is too new to establish mandatory standards. Second, we expect these guidelines to evolve based on experience and the comments of our membership. As such, we welcome your continued input. We will be scheduling regular meetings to review the changes in the dynamic field of social media and to address your comments.

Let me take this opportunity to thank all those who provided commentary during this process, with a special thank you to the members of the task force listed in this document.

Wishing you continued business success.

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Social Media Task Force

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1. Background and Purpose

The emergence of social media has transformed the way people communicate online, providing forums in which we express opinions about products, policies, people and everything else that affects our lives.

Market researchers have devised and applied myriad technologies and techniques—including the creation of research communities, blog mining, text analytics, etc.—in an effort to observe and interact with individuals and extract sentiments expressed within this popular medium.

With unique formats, behavior systems, terminologies and varied expectations of privacy, the social media space requires a specific set of guidelines for research organizations determined to glean market intelligence data from it. It is the intent of the CASRO Social Media Research Guidelines to provide such a framework.

These guidelines describe the social media space and provide contemporary guidance for research organizations. They also acknowledge that the online space is a dynamic environment and they thus seek to establish continuing ethical principles that research organizations can apply to specific technologies and methods as they emerge and develop, rather than to provide detailed rules governing precise methodologies.

It is important to note that these guidelines are based on the CASRO Code of Standards and Ethics (“CASRO Code”). The CASRO Code is referred to often in this document as it provides a broad foundation which covers the fundamental ethical and professional principles that govern all forms of research and which separate research from marketing, sales, and advertising. This document underscores the need to maintain the distinction between market, opinion and social research, and marketing/PR activities within the social media context.

This document also recognizes that governmental regulations in this area are in their formative stages. Therefore, these guidelines are based on the principles underlying current laws and regulations, especially with respect to privacy, data protection, and intellectual property. It is critical for research organizations to be aware of applicable governmental regulations and laws, which may impose even stricter standards and rules in specific jurisdictions at the local, regional, national or international level.

In sum, these guidelines have been written to satisfy several needs: (a) they are consistent with the spirit and intent of existing laws; (b) they reflect the industry’s ethical and professional principles set forth in the CASRO Code of Standards and Ethics (Appendix 1); and (c) they are sufficiently broad and flexible to address both current and anticipated trends in social media.

Note: (a) While the CASRO Code uses the term “respondent,” these guidelines use the term “participant” since that term is more commonly used in the context of social media and more appropriately describes an individual who participates in social media research.

(b) The term research organization is used throughout these guidelines and refers to both research professionals as well as research organizations.

2. Scope

These guidelines cover the collection of social media data for market, opinion or social research purposes. They recognize that there are many different activities enabled by social media—to which market, opinion or social research is just one—and that these varied activities (including customer service, reputation management and crisis management, to name only a few) necessarily have different implications for those who make use of social media.

For example, if a consumer posts a comment about a product or service issue on a social media service (a social network or microblog for example), directly addressing a brand, the customer service function for that brand may be listening and may elect to respond for purposes of remediation. In this circumstance, along with similar instances such as those in which data may be collected for reputation management, crisis communications, R&D, HR or compliance outreach, the interaction between customers and companies is considered distinct from use of social media for market, opinion or social research.

Research organizations must not permit personally identifiable information (as defined in Section 3) they collect in a market research project to be used for direct marketing, sales, or advertising, nor is it permissible to take any direct action toward an individual based on his or her participation in research. Any personally identifiable information collection must be done in accordance with the CASRO Code. If research organizations collect social media data that can be used to identify an individual (contains personally identifiable information) for other purposes, they must clearly differentiate this activity from research activities and not represent it as research. (See section 4.1 for more on this issue.)

3. Definitions

For the purpose of these Guidelines, social media is defined as internet-based platforms and technologies that permit social interaction and facilitate the creation and exchange of user-generated content. A common concept is the blending of technology and social interaction for the creation of content that has value. It is continually changing in its scope. Activities include:

- Online forums/discussions, blogs, social networks (e.g., Facebook or other websites where people can communicate with friends or people with similar interests)
• Video/photo sharing sites or services (e.g., YouTube or other websites where people can upload videos/photos or other content they have created)
• Multi-person/group communication and/or collaboration platforms (e.g., Twitter or other websites where people can leave short comments or messages about any topic. Note: These are also sometimes referred to as micro blogs.).

Social media data specifically refers to information that people share through online services. Such information may include comments, images, status updates and profiles, to name but a few.

Social Media Research (SMR) covers all research activities where the information being used is derived from the social media space. The main currently practiced methods include:

• Monitoring social media (including, for example, automated monitoring, aggregating and analyzing sentiment and ad-hoc desk research)
• Online communities specifically for the purposes of market, opinion and social research (including both dedicated researcher created communities and “natural” or user initiated communities)
• Online ethnographic research (including observation of online behavior and use of social media platforms to collect primary data online in various forms), including netnography
• Co-creational techniques used for social media research

Throughout these guidelines, there are a number of specific terms, with the following meanings:

3.1. Cloaking – a “black hat” search engine optimization (SEO) technique in which the content presented to an automated search process is different from that presented to the user’s web browser. The purpose of cloaking is to deceive search engines so they display the page when it would not otherwise be displayed.

3.2. Client – an individual, organization, company, department or division, internal or external, that requests, commissions or subscribes to a research project.

3.3. Data Collection – the process of extracting data from a social media space, site or service. This can be automated or done manually.

3.4. Data Subject – person about whom data, including personally identifiable information, are held.

3.5. Friending – the action of adding an individual as a friend for social networking sites.

3.6. Informed Consent – agreement by a respondent or participant to participate in research, made with complete knowledge of all relevant facts, such as the risks involved or any available alternatives.

3.7. IP Address Spoofing – refers to the creation of Internet Protocol (IP) packets with a forged source IP address, called spoofing, with the purpose of concealing the identity of the sender or impersonating another computing system.

3.8. Masking – a technique where raw data (e.g., verbatim comments photos, video or other media) are changed specifically in order to make it more difficult for others to discover the identity of the person who made the comment or any identifying characteristics within the media.

3.9. Market Research – the systematic gathering and interpretation of information about individuals or organizations using the statistical and analytical methods and techniques of the applied social sciences to gain insight or support decision making. The identity of the research participant is never revealed to the user of the information without the participant’s explicit consent. In addition, no sales, marketing, or advertising approach is made to participants as a direct result of their having provided any information.

3.10. MROC (Market Research Online Community) – one of the more frequently used terms used to describe an online community created specifically for the purposes of market, opinion and social research. Others include DROC (Dedicated Research Online Community).

3.11. Personally Identifiable Information (PII) – information that can be used to uniquely identify, contact, or locate a single person or can be combined with other sources to uniquely identify a single individual.

3.12. Research – the practice of engaging in market, opinion or social research.

3.13. Research Organization – any individual, company or other entity (such as a not-for-profit organization or government agency) carrying out, or acting as a consultant on a market, opinion or social research project, including those working in client organizations.

3.14. Participant – any individual or organization from which information is collected for the purposes of a research project, whether or not the individual is aware of it. In the context of SMR, the Participant may also be referred to as an Author, Member, Poster or User. (Note: This term may be equivalent to a respondent in other market, opinion or social research modes.)

3.15. Terms of Use (ToU) – any policy, terms or agreement that a website or online service requires its users to accept.

3.16. Walled Garden – an online service that requires users to register or apply for membership before being permitted to participate. A walled garden can only be accessed after the user has obtained a login and/or password, even if entry is automatic.

4. Key Ethical Principles

All fundamental principles of the CASRO Code of Standards apply to Social Media Research. The following section explains their implications in this context.

4.1. Distinguishing Market, Opinion and Social Research from Other Purposes
Research organizations must not permit personally identifiable information they collect in a market research project to be used for direct marketing, sales, or advertising or permit any direct action can be taken toward an individual based on his or her participation in research. Disclosure of any personally identifiable information must be in accordance with the limitations and responsibilities described in the CASRO Code.

Under the CASRO Code, if quotes containing personally identifiable information are passed to the client, the following conditions must apply:

i. the participant has given his/her permission to do so, having been told that he/she will be protected from unnecessary and unwanted intrusions;

ii. the researcher has obtained written agreement from the client assuring that no other use will be made of the personally identifiable information; and

iii. there is assurance from the client or data end-user that no commercial activity will be directed at the participant as a direct result of personally identifiable information having been provided or made accessible.

In some cases, those taking part in research communities could be exposed to sales and PR messages as part of the research process. This is permissible under the CASRO Code provided the purpose is for research. In cases where participants are exposed to sales and PR messages for purposes other than research, these activities cannot be referred to as research.

Research organizations must be transparent in their dealings with social media participants, and not represent as market research any project that has another purpose. To promote clarity and protect the reputation of both the researcher and market research, the research services (and the organization carrying them out) must be presented in such a way that they are clearly differentiated from any non-research activities. To ensure the public is not confused when social media data are being used by an organization involved in both research and non-research activities, it is recommended that:

- the company’s privacy policy and promotional literature differentiate the different services that are being offered, and clearly separate market research from other activities;
- it be easy for participants and others to contact the research organization carrying out the research;
- people making inquiries not encounter obstacles or organizational structures that create confusion about research sponsorship (e.g., by having to interact with a non-research organization or deal with non-research staff when they raise queries or complaints about market research activities); and
- the introduction used when contacting a participant clearly defines the purpose, never leaving the impression that the exercise has a research purpose if it does not.

These requirements do not prevent research organizations from being involved in non-research activities provided that the purpose of collecting personally identifiable data is not misrepresented. Nor do they in any way restrict the right of the organization to promote the fact that it carries out both market research and other activities, provided that the activities are clearly differentiated and conducted separately, in a manner consistent with the relevant laws and local professional rules of conduct.

4.2. Participant Confidentiality

Research organizations are responsible for protecting from disclosure to third parties – including clients and members of the public – the identity of individual research participants as well as their personally identifiable information, unless the participant expressly requests or permits such disclosure. In the context of SMR, research organizations should adhere to these principles by adapting them to the unique context and dynamics, as well as the implicit and explicit expressions of participant privacy expectations, that social media presents. Accordingly, where participant privacy or their expectation of privacy may be violated, a researcher should take particular care to mask responses to ensure that the research participant cannot be identified.

4.3. Privacy and Avoidance of Harassment

Research organizations have a responsibility to strike a proper balance between the need for research in contemporary life and the privacy of individuals who become the participants in the research. To achieve this balance:

i. Research participants will be protected from unnecessary and unwanted intrusions and/or any form of personal harassment.

ii. The voluntary character of the research activity should be stated explicitly whenever the participant might have reason to believe or suppose that cooperation is not voluntary.

4.4. Compliance with Law and Regulation

Research organizations must comply with existing state, federal, and international statutes and regulations governing privacy, data security, and the disclosure, receipt and use of personally identifiable information. Of special consideration is the compliance with legal measures (e.g., Safe Harbor requirements) relating to international transfer of personally identifiable information where data from which personal identifiers have not been removed is transmitted across national borders, as well as considerations as to whether the country to which the data is transferred offers an adequate level of data protection.

By accessing virtually all online services, research organizations will be subject to the service owners’ Terms of Use (ToU). Most ToU have intellectual property rights clauses that explicitly forbid the unauthorized copying of material. Many go further to bar all forms of social media data collection. It is important to note that in some cases, content may be aggregated from other or multiple sites and it may be unclear which ToU might apply. In such cases, researchers must take the necessary steps to ensure that privacy rights or copyrights are not violated. Subject to ‘fair use’ exceptions in certain countries, such ToU...
could prevent research organizations from copying material to their computer for further analysis and forbid any form of selling of that information to their clients, without permission.

For example, the following popular social media ToU can be found on the web at:

Twitter: [http://twitter.com/tos](http://twitter.com/tos)
LinkedIn: [http://www.linkedin.com/static?key=user_agreement](http://www.linkedin.com/static?key=user_agreement)

Research organizations should therefore check to confirm what conditions apply to the content whenever they use social media and respect any requests for privacy (including robot. txt file requests, secure pages, etc.). They must seek permission to collect data from any source where this might breach the ToU and to abide by that service’s ruling. Where permission is not granted, reading of such information and summarizing the issues without copying anything is permissible, subject to the guidelines in section 4. Researchers should not engage in efforts to circumvent web sites’ protection of the data they hold (e.g., IP spoofing, fictitious user ID’s, etc.).

Where research organizations use third party aggregators for data collection services, the responsibility is with the researcher to check with their supplier that permissions have been obtained and the data has been sourced lawfully. In cases where the research organization performs the aggregation, the researcher must make sure that permissions have been obtained and the data have been sourced lawfully.

The ToU will usually also address copyright issues and the use of material on the website. Often the website owner will also be the copyright owner; however copyright laws are complex. They also vary across jurisdictions and researchers must acquaint themselves and observe the relevant laws on this topic.

Finally, specific governmental regulation of SMR is evolving as social media itself evolves; research organizations should bear the responsibility of following and complying with such regulation as it develops. In addition, research organizations must recognize that ToU express the expectations of participants relative to the privacy protections afforded any personally identifiable information they may share on the service and ensure that those protections are observed in the research process.

### 4.5. Informed Consent

Where participants and researchers directly interact, including the case of private spaces (see section 5.2) and MROCs (see section 5.3), informed consent must be obtained in accordance with applicable privacy and data protection laws and regulations and the CASRO Code. In all situations where informed consent must be obtained, participants must understand the purpose and use and voluntarily choose to participate.

In the case of SMR conducted in public spaces (see section 5.1), the research organization must have a reasonable basis to conclude that most users would be aware that the information they provide could be viewed by anyone with relative ease.

When research organizations, or their automated agents, are working in social media spaces, they must provide an email address and a telephone number and/or mail address to facilitate contact and verification. For additional transparency, and to meet data collection notice requirements, research organizations must publish a privacy policy on their website explaining how any personally identifiable information they collect are handled, offering appropriate measures to ensure that users can exercise their rights to require that their personally identifiable information are deleted or rectified, or that their personally identifiable information are not made available to others.

### 4.6. Transparency

Transparency to the research participant is critical in connection with market, opinion, and social research of any kind, including research conducted in the social media space. Wherever possible and applicable, including in the case of private spaces (see section 5.2) and MROCs (see section 5.3), research organizations must disclose all applicable information about their activities to research participants in a timely and open manner and must provide details on how the researcher uses and shares the data subject’s information. Research organizations must never cloak their IP addresses and must always respect user privacy settings.

### 4.7. Data Stewardship

Stewardship of the data subject is critical. Research companies must take steps to protect information collected from research participants in a manner that is commensurate with the research participant’s reasonable expectation of privacy, use and onward transfer, based upon where and to what extent they have placed such data in online social media.

### 4.8. Children

Research organizations must take special care when carrying out research among children and young people.

This is a particular point of sensitivity with many social media services as their users can include very young people. Where a market research online community (MROC) is designed to include young people, reasonable efforts to obtain prior parental permission must take place. Such efforts must be in accordance with applicable international laws and regulations. Where it is suspected that the participant is a young person, a research organization should take particular care to mask responses to ensure that the research participant cannot be identified. In such cases, a research organization must comply with relevant national laws and regulations when determining the definition of a young person.

### 5. Defining the Social Media Space

As preamble to detailed recommendations for working within the social media space, it is necessary to identify the three different areas that comprise the space, since the nature of those spaces has implications for how participants may behave within them and what expectations they bring:
5.1. Public Space
A public space is one in which most participants have a reasonable expectation that anyone can read, cite, reproduce, link, collect and share their contributions, statements and media. Most social media environments fall within this definition. Examples include public profile pages of social media sites and services, public blogs, micro blogs, some natural communities, comment areas on news websites and many other forums (including those where a username may be required, but is automatically granted and where the forum is not subject moderation where the moderator can effectively limit or control access).

Certain social media services permit users to specify which content is accessible to the public at large and which is restricted. The term “public space” refers here to areas of a website where there is an expectation, determined by privacy settings and or ToU, that data will be publicly accessible.

5.2. Private Space
A private space is one that is available only to other space members in a location where users would expect their comments to be private. These are sometimes referred to as “walled gardens”. Although the process for gaining access may be nearly instantaneous, these spaces can be accessed and viewed only after the user has obtained a login and/or password designed to restrict all forms of access. Examples include many private forums, communities and chatrooms, instant messaging systems and forums/groups where an administrator or moderator controls admittance where content cannot be accessed or viewed by the general public.

5.3. Market, Opinion and Social Research Space
A market, opinion and social research space is specifically created for research purposes where users have been informed of, and have affirmatively consented to, the collection, use, and disclosure of their content for such purposes. Typically (but not always) these are also private spaces. Examples include market research online communities (MROCs) as defined above and certain online ethnographic and co-creational techniques, which utilize social media platforms.

6. Recommendations for Researching in Social Media Spaces

6.1. Research in the Public Space
In public spaces, normal public conventions should apply. In the absence of facts that indicate otherwise (e.g., statements made by the participant or other participants), research organizations may make use of this information and collect/copy/use content subject to ToU policies, applicable data privacy laws, and the CASRO Code.

When quoting comments from this area, masking may be required when negative consequences to the participant could reasonably arise from disclosure that results in the violation of the privacy of the participants. Key considerations for determining if masking is used include:

- Sensitivity of the subject
- Inclusion of abusive or offensive language
- Discussion of anything unlawful, embarrassing, or likely to impact career opportunities
- Inclusion of personally identifiable information about the participant or others (except when it is about a well-known person in the public domain and it is not libelous)

Research organizations should be sensitive to the fact that the interpretation of embarrassing information is subjective and should, therefore, exercise an abundance of caution in this area.

Note: These Guidelines make use of the term “masking” and not “cloaking,” which describes a deceptive search engine optimization (SEO) technique (see section 2).

6.2. Research in the Private Space
Because private spaces can only be legitimately accessed with a username and password granted and controlled by an administrator or moderator, research organizations must obtain affirmative opt-in from such participants before using their content to conduct research, in accordance with the CASRO Code and these guidelines. In addition, researchers should include reference to their role in all interactions with members of the private space, so that existing and new members are never in doubt about the identity/role of the persons to whom they are talking.

Research organizations must observe great sensitivity when interacting with people in private spaces. As a general rule, they should not copy or collect content within private spaces, even if they have permission of the site owner, unless participants are fully informed and have opted in to the process. If a researcher wishes to collect content in these environments, there should be total transparency, and the researcher should provide members with a process by which they may be excluded from such data collection.

In a private space, researchers must seek explicit permission from participants to quote their comments and must mask comments before passing them on to clients, unless the creator has given explicit authorization to publish comments verbatim. As previously noted, the degree of masking required depends on the potential risk or harm that might result to the participant if they were identified.

6.3. Research in the Market, Opinion and Social Research Space
Market, opinion, and social research spaces are normally walled gardens to which members have entered with specific understanding of the purpose for which data are being collected, and have accepted the terms and conditions for participation. Accordingly, by definition, research organizations must obtain affirmative opt-in from participants in such spaces before using their content to conduct research, in accordance with the CASRO Code and these guidelines.
These terms must be simple, clearly worded, and easy to understand. Members must be fully aware of the following:

- the purpose of the space – that it is for research; and they may be exposed to marketing information for research purposes only which might include incentives for panel participation (noting that using the client’s products could be regarded as marketing in some countries)
- the fact that data may be shared with the client (especially important since some member activity will be sharing real names and photos/videos, etc.)
- how data could be used
- the rules for interaction (e.g., no cyber-bullying, defamatory comments)
- the relevant privacy policy

Content can be copied, collected, and utilized for any research purpose, subject to full disclosure to members regarding the nature of these applications, but the personal identity of those making comments must be protected, unless explicit consent is obtained. Clients must agree to abide by the CASRO Code of Standards and affirm that such use will be for research purposes only.

Where spaces are communal, members should be warned about contributing personally identifiable information. For example, in a community, members should be given the option of using a disguised username and uploading a photo of an avatar, a pet or inanimate object, rather than requiring that they use their real name and a photo of themselves. In addition, research organizations should provide reassurance to community members at sign-up that they will never ask for information that could create risk of identity theft if lost, misused or disclosed to an unauthorized party, such as credit card numbers, social insurance/social security numbers, bank account details, etc.

The role of moderators and clients should be unambiguous. Moderators and clients must be identified as such in all their interactions and communications with members. However, care should be taken to protect clients and moderators from being easily contacted outside the community or project. Therefore, it may be necessary to withhold full names and/or emails and utilize appropriate techniques to limit access appropriately.

Where MROC’s are used to test products, advertising and/or communication of marketing messages, it is important that participants are made aware of this. For example, if participants are taking part in a simulated sales test, it must be clear that they are helping in a research project, not in some form of direct marketing or sales exercise. No personally identifiable information collected during the course of an MROC may be used for any non-research purpose such as subsequent direct marketing, CRM, or promotion to the individuals taking part.

7. Considerations for Panel or Sample Sourcing

Social media spaces are also being used for research panel recruitment and survey sourcing (e.g., web intercept, “river sampling”, “real-time sampling”). Researchers and research organizations utilizing the Social Media space for panel recruitment or survey sourcing must:

7.1. Clearly represent their activities, purposes and identities when contacting or interacting with potential panelists or research participants.
7.2. Obtain informed consent from potential panelists or participants.
7.3. Make available relevant panel and survey sourcing privacy policy and “terms and conditions” documents to potential panelists or participants.
7.4. Appropriately disclose practices regarding the use of cookies and device ID (a method to identify computer hardware that may also be referred to as digital fingerprinting).
7.5. Follow the applicable practices set forth in the CASRO Code regarding Active Agents, including unacceptable practices, transparency and data stewardship.
7.6. Make available information about the CASRO Code to potential panelists or participants.
Appendix 1: Fundamental Concepts of the CASRO Code of Standards and Ethics

1. Confidentiality: Research organizations are responsible for protecting the identity of individual Respondents (Participants in the case of SMR) as well as Respondent identifiable information (Participant identifiable information in the case of SMR).

2. Privacy and Avoidance of Harassment: Research organizations have a responsibility for striking a proper balance between the needs for Research in contemporary life and the privacy of individuals who become the Respondents (Participants in the case of SMR) in the research.

3. Internet Research: The unique characteristics of Internet research require specific notice that the principle of Respondent privacy (Participant privacy in the case of SMR) applies to this technology and data collection methodology. Specific areas of consideration here are informed consent, transparency and data stewardship.

4. Privacy Laws and Regulations: Research organizations must comply with existing state, federal, and international statutes and regulations and laws governing privacy, data security, and the disclosure, receipt and use of personally identifiable information.

Appendix 2: Terms of Use (ToU) Examples

Facebook: http://www.facebook.com/terms.php
Twitter: http://twitter.com/tos
LinkedIn: http://www.linkedin.com/static?key=user_agreement

Appendix 3: Contract/Policy Guidance for Subcontractors/Third Party Suppliers of Social Media Research and Related Services

A research provider may use subcontractors or third parties for fulfillment of portions of a social media project. When subcontractors are used, CASRO requires that the research provider must check to ensure that they follow appropriate practices and procedures, especially with respect to the privacy and data protection of personally identifiable information. These practices include:

- Performance of proper due diligence when identifying and selecting subcontractors;
- Execution of written Non-Disclosure agreements;
- Execution of written contracts that outline duties, obligations, and responsibilities of the subcontractors that address all parts of the research process, especially privacy and data protection; parties involved and address non-disclosure requirements; and
- Engagement in on-going oversight of subcontractors and their activities.

Policies and contracts relating to the research process and privacy and data protection are available from CASRO (www.casro.org) through the model documents, agreements, and contracts of the CASRO Privacy Protection Program (CASRO 3P). The CASRO 3P program has been designed to address the needs of various geographies, including the US and the EU.

Model contracts for transfer of personal data from the EU are available from the European Commission (http://ec.europa.eu/justice/policies/privacy/modelcontracts/index_en.htm)