

**Institute for Social Research
University of Michigan**

PLEDGE TO SAFEGUARD RESPONDENT PRIVACY

I have read the Institute for Social Research Policy on Safeguarding Respondent Privacy, and pledge that I will strictly comply with that policy. Specifically:

I will not reveal the name, address, telephone number, or other identifying information of any respondent (or family member of a respondent or other informant) to any person other than a member of the research staff directly connected to the study in which the respondent is participating.

I will not reveal the contents or substance of the responses of any identifiable respondent or informant to any person other than a member of the staff directly connected to the study in which the respondent is participating, except as authorized by the project director or authorized designate.

I will not contact any respondent (or family member, employer, other person connected to a respondent or informant) except as authorized by a member of the staff directly connected to the project in which the respondent is participating.

I will not release a dataset (including for unrestricted public use or for other, unrestricted, uses) except in accordance with policies and procedures established by ISR and the Center with which I am affiliated.

I agree that compliance with this pledge and the underlying policy is: 1) a condition of my employment (if I am an employee of ISR), and/or 2) a condition of continuing collaboration and association with ISR (if I am not an employee of ISR, such as a student, visiting scholar, or outside project director or co-principal investigator).

If I supervise non-ISR employees who have access to ISR respondent data (other than unrestricted public release datasets), I will ensure that those employees adhere to the same standards of protection of ISR respondent privacy, anonymity, and confidentiality, as required by this pledge and the associated policy.

Signature: _____

Typed or printed name: _____

Date: _____

University of Michigan

POLICY ON SAFEGUARDING RESPONDENT PRIVACY

Policy:

The Institute for Social Research (ISR) promises those who participate in its surveys and other studies that their responses will be kept completely confidential. The Institute takes this obligation very seriously and requires that all Institute staff, and other persons associated with the Institute's research, read this Policy and sign a Pledge promising compliance with the Policy. Failure to comply with the Policy may result in discipline up to and including termination of employment for Institute employees, and severance of any relationship with the Institute and the applicable research project for all other affiliates.

The Institute widely disseminates anonymized datasets based on information provided by respondents. However, the utmost care is taken to ensure that no data are released which would permit any respondent to be identified, except in those rare cases in which the respondent specifically authorizes the identification. Thus, the Institute requires that all Institute employees, and affiliated non-employees sign pledges agreeing to safeguard respondent privacy, anonymity, and confidentiality. No individual or entity will be permitted to work with any Institute research data (other than unrestricted public release datasets) unless this pledge has been formally signed by the individuals involved.

This policy applies to all written and electronic forms of data, and to data collection, management, and storage. It applies to all persons who have access to information about ISR respondents, regardless of whether that access has been specifically authorized.

Definitions:

As used in this policy and associated pledge:

"Affiliate" means a non-employee of the Institute for Social Research who has, or might have, access to information provided by ISR respondents, including contractors and their employees, consultants, visiting scholars, informal visitors, teaching assistants, co-Investigators and project directors from other University of Michigan departments or other institutions, and custodial and security staff assigned to ISR.

"Anonymity" means that the name and other identifying information about a respondent, a proxy for a respondent, or about other persons on whom the respondent or proxy provides information, will not be revealed.

"Confidentiality" means that specified information provided by a respondent or a proxy for a respondent will not be disclosed without the permission of the respondent. Names and other identifying information regarding respondents, proxies for respondents, or other persons on whom the respondent or proxy provides information, are presumed to be confidential. Other information may be designated as confidential by specific agreement of the respondent and ISR staff.

"Employee" means an employee of the Institute of Social Research, including regular employees, temporary employees, contingent employees, Graduate Student Research Assistants, Research Fellows, and other employees.

"Privacy" means the ability of a respondent to control the dissemination of information about the respondent or a proxy, or provided by the respondent about others.

"Promise of confidentiality" means a promise to a respondent that the information the respondent provides will not be disseminated without the permission of the respondent; that the fact that the respondent participated in the study will not be disclosed; **and** that disseminated information will include no linkages to the identity of the respondent. Such a promise encompasses traditional notions of both confidentiality and anonymity.

"Respondent" means a survey respondent or informant, experimental or observational subject, focus group participant, or any other person providing information to an ISR study or on whose behalf a proxy provides information.

Rationale:

The mission of the Institute for Social Research is to advance the understanding of human behavior and social life through research designs which measure attributes of individuals, organizations, and their social contexts. These research designs are usually implemented by the collection, analysis, and publication of data from scientific samples of local, national, and international populations. Most ISR studies require interviewing human subjects (respondents) in order to obtain the necessary data.

ISR recognizes and appreciates that respondents should be given assurances that information provided by respondents will be confidential and the respondents remain anonymous; and that the loss of confidence by respondents in ISR's promises of confidentiality could significantly threaten the Institute's ability to conduct accurate scholarly research studies. The Institute values each respondent's right to privacy, to decide voluntarily when to participate in Institute research, and to be informed about the purpose, scope, and importance of their participation. ISR study procedures are designed to ensure that individual respondents are protected at each stage of research.

The confidentiality and anonymity of information collected or held by ISR personnel must be assured through careful design and implementation of safeguards throughout all stages of the research process. All information obtained during the course of the research about respondents, their families, or the organizations they represent, is protected information, subject to the promises of confidentiality, regardless of whether that information is derived from the respondent or is otherwise learned by researchers incidental to the performance of their work. ISR employees and others are obligated to respect as confidential and anonymous all such information, and never to discuss it for any reason not directly related to the project.

(Some ISR research projects may use informed consent statements that make clear that certain types of information obtained from or about the respondent will **not** be subject to the promises of anonymity and confidentiality. Even as to information apparently included in such exemptions, however, decisions about whether and under what circumstances the information will be disclosed may be made only by project directors and Center and ISR officials and not by any other employees or affiliates.)

When confidentiality as to specified information has been promised to a respondent, the authority to give permission for release of the information belongs to the respondent, rather than to a proxy for the respondent or to the persons on whom the respondent provided the information.

It is the responsibility of the Institute, and its employees and affiliates, to protect the anonymity of respondents and the confidentiality of its research documents and data at each stage of the research process: data collection, storage, processing, analysis, and dissemination.

The sanctions for violations of this policy do not apply to releases of data pursuant to a valid court order, provided the release is made with the approval of the appropriate project, center, ISR, and University of Michigan officials.

(1) *Data Collection*: All persons associated with data collection must endeavor to conduct interviews or other data collection activities in situations that do not compromise the respondent's privacy. Data and documents in which individuals, families, or organizations are identified, must be maintained so that access by unauthorized persons is prevented. Data should not be collected from persons the staff knows personally, except with prior approval of the research project directors.

(2) *Data Storage, Processing, and Retrieval*: All information that identifies an individual respondent -- such as name, address, telephone number, or other identifying information available to persons outside ISR -- must be separated from the substantive information collected, and placed in secured files as soon as possible after data collection from the respondent is completed. Research documents that identify respondents or organizations must be kept in areas with restricted access. When such documents are being handled and used, they must never be left unattended, and they should be locked away when not in immediate use. Access to identifiable survey data should be limited to appropriate personnel who have signed the pledge associated with this policy.

Contractors and other non-employees of ISR who process information with respondent identifiers, such as for data entry or respondent location services, must comply with the same rules as ISR staff. It is the responsibility of Institute staff coordinators to secure written promises from such contractors that they will comply with this policy, and that they will return all originals and copies of any ISR data provided to them. Institute staff has the responsibility to monitor the compliance with this policy of contractors and other non-employees of ISR. Non-ISR collaborators or co-investigators of Institute investigators, and their staffs, have the same responsibility as to outside contractors they use.

Research documents such as completed questionnaires, coversheets, data tapes, printouts, photocopies, electronic files, or any other documents with respondents' names or other identifying information, must be stored securely, used exclusively in a manner for which they were intended, and disposed of in a secure manner.

More detailed standards for data security appear in ISR and Center policies and guidelines on that subject.

(3) *Data Dissemination:* The utmost care must be taken to prevent the dissemination of research datasets containing information that would permit any respondent to be identified. Research results must be presented only in summary form without names or other identifying information. Unrestricted public use data sets must be anonymized, and every effort must be made to prevent deductive identification of respondents. Where such deductive identification seems a realistic possibility, special restrictions must be placed on access to the data to protect anonymity and confidentiality of respondents. More detailed standards for data release appear in ISR and Center policies and guidelines on that subject.

Institute staff must treat all information linked to identifiable respondents as protected information, except in those cases where respondents or organizations waive anonymity or confidentiality for specified uses. In such cases, respondent information will only be released for those specified uses. Sponsoring agencies will be provided with respondent names or other identifying data only if such release is clearly specified in the research proposal, and is specifically authorized in writing by respondents.

Procedures:

All employees and affiliates of the Institute for Social Research are required to sign the pledge associated with this policy as a condition of their employment and affiliation.

All newly hired or appointed employees in the Institute are required to sign this pledge, as a condition of their employment, at the time of hiring. All hiring supervisors and primary research recruitment committees are required to communicate this policy and the need for a signed pledge during the recruitment process, so that all candidates are fully advised of this requirement early in the interviewing process.

All new affiliates are required to sign the pledge associated with this policy as a condition of their affiliation with ISR, at the time of their affiliation. For contractors and their employees, the signing must be done at the time of the signing of the formal contract for their services.

A special case exists where an ISR project director is supervising an ISR-funded project, the data or subjects of which are being utilized by research staff in another campus unit. Before those staff can handle the data collected under ISR auspices, they must sign the ISR pledge. An "equivalent" pledge provided by the campus unit is not sufficient.

The relevant Center directors' offices are responsible for overseeing the process and will initiate the initial signature process for all current employees and affiliates on June 1, 1997, and will require that all initial pledges be signed and returned by October 1, 1997. Procedures for ensuring that all new employees and affiliates (hired after June 1, 1997) sign pledges will be implemented by July 1, 1997.

The relevant Center directors' offices (and the ISR Director's office for employees and affiliates not associated with any Center) are responsible for ensuring that all employees and affiliates renew the pledge at least once each year. Although the timing of this renewal is left to the discretion of the Center directors' offices, it is recommended that employees renew their pledges during their annual performance and salary review process.

Project and other ISR administrative staff are responsible for identifying affiliates in their areas subject to this policy, and reporting the names of those individuals to the relevant Center director's office, and for forwarding all signed pledges to those offices.

All signed pledges will be maintained in the central Institute personnel files for ISR employees, and in a central file in each Center director's office for affiliates of that Center.

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