

Keeping Sensitive Client Information Confidential: A Checklist for QRCs and Facility Managers

Members of the MRA/QRCA Task Force on Security and Confidentiality describe how to protect sensitive client information during the planning and conduct of qualitative research studies.

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Given all the pressures moderators experience while working on a qualitative project, security and confidentiality may become a low priority. However, even an inadvertent or minor breach of security can have far reaching consequences and threaten the moderator's and the facility's continuing relationship with the client.

The MRA/QRCA Joint Committee commissioned a task force to look into this issue. The following list of best practices is the outcome of their work. The purpose of these recommendations is to help facility managers and moderators maintain proper security and confidentiality of sensitive client information during the planning and execution of a qualitative research project.

The recommendations made here are not meant as rigid rules that every moderator and facility must follow for every project. Sometimes it may not be practical, feasible, or necessary to follow every recommendation made here. Rather, moderators and facilities should consider these to be general guidelines. In each section, recommendations are suggested for shared responsibilities (tasks to be completed jointly by the moderator and facility manager) as well as specific responsibilities for each party.

During Project Planning

Shared Responsibilities

- Review MRA/QRCA guidelines and clearly communicate expectations to each other.
- Create a code name and job number for the project. In all subsequent written or oral communications, refer to the project only by its code name or job number.
- Review Security Considerations form together.
- Verify shipping address in advance for all materials to be mailed.

Responsibilities of Facility Managers

- Facilities are often in a position to bid on the same project with multiple moderators. When this occurs, keep all financial information for these respective bids confidential.
- If at all possible, do not schedule competitive projects simultaneously at the same facility. Note: "Competitors" are companies conducting research within the same business category.) When this is unavoidable, be sure clients are in totally separate areas and that the separation of these areas is closely monitored. Consider informing the respective moderators that their client's competitor will be in the building at the same time. In addition, remind all staff to exercise a heightened degree of caution.
- Store all samples/lists in a secure area. Facilities should never retain any information from samples/lists without the expressed consent of the moderator. Never make copies of any samples or lists without the prior consent of the moderator.

- Arrange for safekeeping of all materials received before the project begins:
- Do not open these materials, unless instructed to do so by the moderator.
- Inventory the materials and label them "Hold for [moderator] or [project code]."
- Place the materials in a locked area that is inaccessible to anyone not directly involved in the project.
- Secure any paperwork associated with the project in areas where it cannot be viewed by anyone—other staff, moderators, or clients— not directly involved with this project.
- When typing respondent profile sheets: – Use respondents' first names only - Do not include addresses, telephone numbers, or other identifying information.
- Modify the autoexec.bat files on all computers that clients might use. Reboot these computers at the end of each day.
- Develop and consistently implement a policy for discarding sensitive documents— shredding or providing clients with a "burn bag" or special container for collecting materials that will be destroyed.
- Remind recruiters and other personnel that all project information is confidential and should not be discussed with anyone who is not directly involved with the project.
- Have recruiters, video operators, note-takers, and other appropriate personnel sign confidentiality/non-disclosure agreements.

Moderator Responsibilities

- For any materials sent before the project begins, inform facility manager of when to expect their delivery. Identify project only pre-arranged project code name on the shipping labels.
- Review security procedures with observers.
- Clarify with client/observers what materials, such as handouts, they consider confidential. Reach agreement about how to handle confidential materials during and after the project. Determine, for example, which materials should be returned to the client and the method of disposal if materials are to be discarded.
- For all materials to be discarded, clarify with facility manager what can be treated as trash and what should be shredded or burned.
- Stipulate a final date by which any materials left at the facility will be discarded or disposed of at the facility manager's discretion.

At the Facility

Shared Responsibilities

- Upon meeting at the facility, review security policies, precautions, and expectations of each other's roles.
- When the project is over, the moderator and the facility manager should inspect all focus group rooms, observation areas, copiers, flip-chart easels, client lounges, and trash containers in focus group rooms, observation areas, and other areas for materials left behind. Check for floppy disks in computers in any areas accessible by moderator or observers.

Responsibilities of Facility Managers

- Discreetly ask observers for the code name of the project they are attending. Check photo ID to verify identity.
- Personally escort each observer to the proper area of the facility.
- Clearly explain security procedures at the facility.
- Make sure all secure areas are locked and inaccessible to observers.
- If an observer requests copies of documents, facility staff should make the copies and return them to the observer, who should not leave the observation area.

- Provide a separate waiting area for respondents.
- When re-screening respondents, do so in a private area, so that other respondents and passersby will not overhear the conversation.
- Conceal incoming faxes, phone messages, or other communications intended for observers and moderators in a folder or envelope and deliver only to the person to whom the communication is addressed.

Moderator Responsibilities

- Provide facility manager/hostess with a final list of all clients or other observers who might visit the facility. Designate a “back room leader” to approve any observers not on the list who request admission to the back room.
- If the project will last more than one day, arrange for any materials left overnight at the facility to be stored in a locked area.
- Remind observers not to discuss the project while in unsecured locations in the building.
- Report any suspicious activity in the building to the facility manager.
- At all times, keep the doors to the focus group room and the observation area/lounge closed.
- Use first names only with participants and discourage them from identifying themselves in any way to the observers, particularly during introductions or icebreakers at the start of the group or IDI.
- For all materials to be discarded, separate materials that can be treated as trash from materials that require special disposal.

At the Conclusion of the Project

Shared Responsibilities

- Review the project with counterpart, discuss how security/ confidentiality issues were handled. Brainstorm any changes or improvements that could be made in the future.

Responsibilities of Facility Managers

- Dispose of materials as previously agreed—some to be treated as general trash, others to be burned or shredded.
- Keep all materials to be shipped to the moderator or observers in a locked area prior to shipping.
- Return these materials to the appropriate party as soon as possible.
- Check any computers that may have been used by the moderator or observer. Delete any files saved to hard drive.

Moderator Responsibilities

- Check computers in the area for CDs or floppy disks inadvertently left behind.
 - Ask client observers to sign for tapes
 - Do not display confidential materials or work on sensitive elements of the final report in public places—in airport waiting areas or on a plane, for example.
 - Clearly mark all reports and other sensitive work products confidential, whether delivered electronically, as a hard copy, or a fax.
 - Do not discuss the results of any project with an outside party other than the client.
 - When developing sales and marketing materials, do not list previous clients by name or discuss, even in general terms, the work done for them without their permission.
- For sample documents you can use to outline security procedures with clients, facilities, and others, please email Mark Herring at: mherring@compuserve.com*