

# Proposed Revised ICC/ESOMAR International Code on Market, Opinion and Social Research and Data Analytics

# February 2025

# Introduction

Market, opinion and social research aim~~have long aimed~~ to provide objective, fact-based information and ~~valuable~~ insights into people’s ~~behaviours, needs, and~~ attitudes, needs and behaviours, helping businesses, policy makers and decision makers decide on the most appropriate course of action.~~governments and society make informed decisions.~~ To achieve this and strengthen~~to reinforce~~ our commitment to effective self-regulation, we prioritise ~~place a strong emphasis on~~ protecting ~~participants’~~ privacy, fulfilling~~upholding~~ our duty of care, ensuring~~maximising~~ transparency, ~~adhering to legal requirements and~~ promoting professional responsibility, and compliance with the law.

The ~~In recent years, the~~ research sector faces dynamic ongoing change,~~has faced significant changes~~ driven by ~~digital advancements,~~ the continued growth~~expansion of the internet~~ and diversification of social media, ~~the rapid rise of~~ Artificial Intelligence (AI) and other associated emerging technologies. The disintermediation[[1]](#footnote-2) of the ~~These developments, alongside streamlined~~ research process itself represents an important change which is~~processes, are~~ transforming the ways we collect, curate, analyse and interpret data. The client can therefore be both the person or entity commissioning

~~ESOMAR and the International Chamber of Commerce (ICC) have always endeavoured to keep pace with, and when possible, anticipate changes in technology, society, culture,~~ and conducting all or part of the research. ~~economic ecosystems that affect our sectors.~~

These developments, together with the consideration of the role of new technologies and the associated importance of oversight, mean that it is more important to identify who is commissioning the research programme, who is contributing to the work required to conduct the research programme, and the clear responsibilities and accountabilities of each in respect of adhering to this Code of Conduct.

This~~Our~~ Code, recognised by over 60 associations in more than 50 countries, was established over 70 years ago and has been developed in partnership with the ICC since 1977. The Code gains significant weight from the adoption of ICC representing over 45 million members in more than 170 countries. It has been revised several times to maintain its relevance;~~,~~ with the most recent update in 2016. This 2025 Code revision~~In light of the changes outlined above, we believe it~~ is intended~~time~~ to ensure that~~revise~~ the Code remains current and fit-for-purpose~~once again~~.

~~The 2025~~This revision is significant, emphasising ethical conduct, accountability, transparency, and the necessity~~growing need~~ for human oversight in a world navigating between~~that balances~~ optimism and caution regarding~~about~~ the transformative potential of digital advancements and emerging technologies, together with their~~and the~~ challenges and responsibilities ~~they bring~~.

This~~We are confident that the~~ updated Code continues~~will continue~~ to uphold research as a responsible global citizen, promoting high ethical standards and fostering public confidence worldwide.

# About This Code

**Code Responsibility and Interpretation**

This Code represents~~is~~ a comprehensive set of articles as a guide for ethical and professional conduct in market, opinion and social research, as well as data analytics. It sets standards to maintain public trust, ensure compliance with local and international laws, and to uphold industry best practices. Researchers and analysts — whether using traditional methods or emerging technologies — are expected to meet their ethical, professional and legal responsibilities to research participants, clients and the public at large. The Code also affirms researchers' rights to seek and share information, as established in Article 19 of the United Nations International Covenant on Civil and Political Rights.

The Code applies to everyone involved in market, opinion and social research and data analytics, qualitative and quantitative, including those using ~~cloud-based,~~ self-service platforms. Researchers~~Individuals~~ must adhere to the Code according to their role and level of influence. In this context, the revised code imposes an additional responsibility on the client or the commissioner of the research to ensure that any contractors they hire are both aware of the code and comply fully with it.

This Code is mandatory for all ESOMAR members and for those in other research associations and ~~other~~ self-regulatory bodies that adopt and implement it, together with all those involved or engaged with any part of the research process.

The Code should be applied both in its spirit and its specific wording. It must be applied~~read~~ alongside other relevant ICC and ESOMAR codes, guidelines, principles and framework interpretations that provide context for its application in specific research methods and practices. These and other similar documents are available at [www.iccwbo.org](http://www.iccwbo.org) and [www.esomar.org](http://www.esomar.org).

# Definitions

For the purpose of this Code the following terms have this specific meaning:

**Artificial Intelligence (AI)** is a set of technologies that are designed~~enables computers and machines~~ to simulate human intelligence and problem-solving capabilities. ~~On its own, or combined with other technologies, AI can perform tasks that would otherwise require human intelligence or intervention.~~

**Child** refers to a person aged 12 years and under[[2]](#footnote-3). See also “Young person” below. **~~Children~~** ~~means individuals for whom permission to participate in research must be obtained from a parent, guardian or responsible adult. Definitions of the age of a child vary substantially and are set by national laws and self-regulatory codes to which all research must comply~~.

**Client** means any individual or organisation, department or division - internal or external - that requests, commissions or subscribes to all, or any part of research.

**Consent** means an individual’s freely given, specific and informed indication of agreement in response to ~~a conspicuous and~~ clear information~~notice~~ regarding the collection, processing and any use of their data.

**Data analytics** means the process of integrating and/or interrogating~~examining~~ datasets to uncover hidden patterns, unknown correlations, trends, preferences and other useful information for research purposes.

**Data subject** means any individual/person whose data, whether qualitative or quantitative, is~~personal data are~~ used in research.

**Harm** means tangible or material harm (such as physical injury or financial loss), intangible or moral harm (such as damage to reputation or goodwill), or excessive intrusion into private life.

**Individual/person** refers to a human being to differentiate from a synthetic, virtual/digitally created persona or entity.

**Non-research activity** means~~involves~~ any direct engagement with an individual whose personal data has been collected or analysed, with the intent to influence~~primary purpose of influencing~~ their attitudes, opinions or behaviours~~, including the purchase of products~~, rather than contributing to generalisable knowledge or scientific inquiry.

**Passive data collection** means the collection of personal data by observing, measuring or recording an individual’s actions or behaviour.

**~~Person~~** ~~refers to a human being to differentiate from a synthetic, virtual/ and digitally created persona or entity.~~

**Personal data** means any information relating to an individual (data subject)~~a living person~~ that can be ~~used to~~ directly~~[[3]](#footnote-4)~~ or indirectly[[4]](#footnote-5) identified by ~~identify that person (~~the holder of the data. ~~subject).~~

**Primary data** means data collected by a researcher directly from or about an individual for the purpose of research.

**Privacy notice** (sometimes referred to as privacy policy) means a published summary of an organisations or individual operator’s,~~organisation’s~~ privacy practices describing the ways the organisation gathers, uses, discloses and manages a data subject’s personal information~~data~~.

**Research,** which includes all forms of market, opinion and social research, including data analytics applied for research purposes, means~~, is~~ the systematic gathering, analysis and interpretation of information about individuals and organisations. It uses the statistical and/or analytical methods and techniques of the applied social, behavioural, data and other~~data~~ sciences to generate insights and support decision-making by providers of goods and services~~corporations~~, governments, non-profit organisations and the general public.

**Researcher** means any person or organisation conducting all or any part of a research program~~or contributing to research, including those working in client organisations and any subcontractors used~~.

**Secondary data** means data collected by another party, whether for a research or non-research purpose, and data that have already been collected, and are available from another source.

**Synthetic data**: Information that has been created to replicate the characteristics of real-world data.

**Synthetic persona/respondent**: Digital representations of a person or group of people created to mimic the behaviours, preferences, and characteristics of real people or groups.

**Vulnerable person~~people~~** means an individual/person who may have limited capacity to make voluntary and informed decisions, including those with temporary or permanent cognitive impairments or communication disabilities.

**Young person** means an adolescent aged 13 to 17[[5]](#footnote-6).~~in the developmental stage between childhood and adulthood - capable of some degree of independent decision-making but still requiring guidance.~~

# Fundamental Principles

This Code is based on five fundamental principles that encompass the role and relevance of market, opinion and social research and data analytics in the current environment. They are intended as underpinning guidance to the interpretation and application of the Articles of the Code. While legality is the foundation, the Code upholds ethical standards that go above and beyond legal requirements. ~~:~~

1. All research must be legal, honest, transparent and truthful.
~~.~~
2. All research must be conducted with due care. The interaction must be fair,  ~~and interact with data subjects in a fair and~~ respectful and avoid harming~~way, protecting them against any adverse effects as a direct result of~~ the data subject.
~~research.~~

It

1. ~~All research must be honest, truthful and transparent as to how it is designed and implemented; it~~ must be clear to data subjects how personal data will be collected and used. All personal data must be fully protected.
 ~~against unauthorised access and use and must not be disclosed without proper consent.~~
2. Researchers must behave ethically and not do anything that may undermine the public’s trust and confidence in ~~market, opinion and social~~ research or the reputation of the research industry~~and any related data analytics~~.
3. Researchers have the overall responsibility and oversight for the research they undertake, irrespective of the technique and technology applied. Those~~including research using AI or emerging technologies. All, including any subcontractors or other third-party service providers~~ who contribute to the research have a degree of responsibility depending on their activities, expertise and control.

# Articles

## Responsibilities to Data Subjects

# **Article 1 Duty of Care**

1. All individuals (including children, young people and other vulnerable individuals) –~~),~~ who are approached directly or indirectly ~~(including as secondary data subjects and where feasible)~~ to participate as data subjects –,~~,~~ have the right to decline participation. This includes secondary data subjects, where feasible. ~~right must be respected at all times.~~
2. Regardless ~~Researchers must ensure that data subjects are not harmed as a direct result~~ of whether~~their~~ personal data is~~, whether~~ gathered for quantitative~~directly, indirectly~~ or qualitative ~~passively, being used for~~ research, researchers must ensure that participation does not result in~~.Researchers must consider the data subject’s well-being and not cause any mental or physical~~ harm, whether data is~~. Special care must be exercised when the nature of the research is sensitive or the circumstances under which the data are~~ collected directly or indirectly.
3. Essential personal~~might cause a~~ data may be disclosed~~subject~~ to ~~become justifiably upset or concerned. Researchers may disclose essential private information to appropriate~~ emergency services in~~if they encounter an~~ exceptional ~~circumstance, such as a~~ life-threatening~~, self-harm~~ or abusive situations, as defined by local law~~situation, during their research~~.
4. Researchers must remain mindful that research relies on public confidence in the integrity of research and the confidential treatment of the information provided. Researchers must ~~, for its success, and~~ therefore ~~must~~ remain diligent in maintaining the distinction between research and non-research activities.~~[[6]](#footnote-7)~~ [[7]](#footnote-8))
5. Data subjects must be informed of any ~~If researchers intend or anticipate engaging in~~ non-research activity – ~~activities (~~for example promotional, commercial or customer experience follow-up –~~activities) directed at individual data subjects, this must be made clear to all data subjects~~ before ~~the start of~~ data collection begins. Separate consent~~. Consent for the non-research use~~ must be obtained for non-research purposes. These applications must be clearly distinguished from the ~~data subject and the non-~~research activities~~application separated from any research activity~~.

# **Article 2 Children, Young ~~People~~Persons and Other Vulnerable Individuals**

1. Consent from a parent, guardian or responsible adult must be obtained whenever children are involved as data subjects, and also whenever such consent is required under applicable law.

Researchers must initially determine the data subject’s age and obtain ~~the~~ consent ~~of the parent, or legal guardian,~~ before collecting any further personal data from children. The nature and extent of the information to be collected must also be presented at this time, together with a clear means to provide consent.

1. Researchers must take special care when considering whether to involve children and young people in research. The content and nature of the research must be appropriate with respect to age, level of maturity and differing cognitive abilities. During the entire research process, due care must be exercised with respect to any susceptibility that the child or vulnerable person may have or exhibit.
2. Personal data must only be disclosed by researchers to third parties after obtaining consent from a parent, ~~or~~ legal guardian or responsible adult or where disclosure is authorised by law.
3. When working with other vulnerable individuals, researchers must ensure ~~these individuals~~they are capable of making~~fully informed about the research purpose, can make~~ informed decisions ~~regarding their participation,~~ and are not unduly pressured~~subjected~~ to cooperate~~undue pressure to comply~~ with a research request.

# **Article 3 Data Minimisation**

1. Researchers must limit the collection and/or processing of personal data in any type of research project to only those items that are reasonable and relevant to~~, and not place any burden on~~ the purpose of~~data subject beyond that which is necessary and compatible with~~ the ~~intended use of the~~ research (also see Article 6.e).
~~.~~
2. Where data is provided to subcontractors~~,~~ or other third-party suppliers, only the minimum amount of personal data ~~that is~~ necessary for them to perform the agreed services must be transferred. Such data must not be used for any additional purpose.

# **Article 4 Primary Data Collection**

1. When collecting personal data directly from a data subject for the purpose of research:
	1. Researchers – regardless of whether representing an organisation, company or as an independent practitioner – must identify themselves promptly, and data subjects must be able to verify the identity of the researcher without difficulty. The data subject must also be able to ~~quickly and easily~~ contact the researcher’s~~research~~ organisation quickly and easily with any concerns or questions they may have about the research.
	2. The use of a synthetic persona/agent for data collection must be clearly notified to the data subject at the outset of the research.
	3. Researchers must clearly state the general purpose of the research at the outset. If this is not possible due to methodology, data subjects must be informed of the purpose at the earliest opportunity.
	4. Researchers must ensure that participation is voluntary and based on clear and accurate information about the general purpose and nature of the research ~~that is adequate and not misleading~~.
	5. Researchers must inform data subjects if ~~there is~~ any activity ~~that~~ will involve re-contact and seek the data subjects’s agreement~~subjects must agree~~ to such~~be~~ re-contact~~contacted~~. The only exceptions~~exception~~ to this are~~is~~ re-contact for quality control and the reporting of adverse events~~purposes~~.
	6. Researchers must provide a clear statement as to~~on~~ how long, and for what purpose, personal data is~~are~~ retained, including that by subcontractors and clients.
2. When collecting data indirectly from a data subject:
3. Where possible, ~~passive~~ data collection must be based on the consent of the data subject and meet all the conditions (a) i-vi above.
4. Where it is not possible to obtain consent, researchers must have legally permissible grounds to collect the data, and they must remove or obscure any identifying characteristics as soon as operationally possible.
5. Researchers must allow data subjects to withdraw from the research at any time.
6. Data subjects must have access to ~~correct~~amend their personal data where technically and operationally feasible and where this does not impact the research results.

# **Article 5 Use of Secondary Data**

When using secondary data that includes personal data, researchers must ensure that:

1. The intended use is compatible with the purpose and the quality for which the data was originally collected and that there are clear grounds for its re-use for any additional data collection or processing.
2. The data is~~was~~ not collected in violation of restrictions imposed by law, ~~or this Code,~~ through deception~~,~~ or in ways that were not readily apparent to~~,~~ or reasonably discernible and anticipated~~,~~ by the data subject.
3. The intended use was not specifically excluded or disguised in the privacy notice, provided at the time of original collection, nor does it violate ~~or~~ any contractual restrictions, copyright or intellectual property rights.
4. The use~~Use~~ of the data will not result in direct harm to data subjects, and there are measures in place to prevent~~guard against~~ such harm.

# **Article 6 Data Protection and Privacy**

1. Researchers and subcontractors must not share or transfer a data subject’s personal data to a client unless the data subject has consented~~given consent and agreed~~ to the specific purpose for which the data will be used and agreed to such transfer.
2. Researchers must provide~~have~~ a privacy notice that is clear and readily accessible to~~by~~ data subjects. If tracking tools are used, notice of this must also be given before any data is collected from the data subject.
3. Researchers must take steps to ensure that personal data~~,~~ including ~~an individual’s~~a person’s inferred identity is not traceable via deductive disclosure even when ~~. This includes via the use of~~ advanced analytic techniques are used. Such techniques may involve ~~such as~~ cross-analysis, small samples, other forms of inference or combining~~combination~~ with additional~~other~~ data such as a client’s records, ~~or~~ secondary or publicly available data sets~~in the public domain~~.
4. Researchers must take all reasonable precautions to ensure that personal data is held securely. It must be protected against risks such as loss, unauthorised access, e.g. cyberattacks, hacking, destruction, misuse, manipulation, modification, disclosure or any other act that could compromise data.
5. Personal data is to be held no longer than is necessary and only for the initial purpose for which it was collected or used. After this, the data must be anonymised or deleted.
6. Before transferring~~If~~ personal data ~~is to be transferred~~ to clients, subcontractors, or other third-party service providers, researchers must ensure that such~~the~~ recipients maintain~~employ at least an~~ equivalent ~~level of~~ security measures, and comply with~~are aware of~~ this Code, and all~~follow any~~ applicable data protection and data breach laws.
7. Researchers must take particular care to maintain the data protection rights of data subjects whose personal data is transferred from one jurisdiction to another. Such transfers must not be made without the consent of the data subject or on other legally permissible grounds. In addition, researchers must take all reasonable steps to ensure that the security measures and data protection principles of this Code are complied with by all parties.
8. In the event of a data breach involving~~containing~~ personal data, researchers have a duty of care responsibility to~~for~~ the data subjects involved. Those data subjects, along with any necessary authorities, ~~and they~~ must be informed of the breach as required by applicable laws.

## Responsibilities to Clients

# **Article 7 Fit for Purpose**

1. Researchers must design research that is fit for purpose, meets ~~and to~~ the requirements and quality agreed with the client and complies~~in accordance~~ with Article 9(a). If this is not considered to be the case, the client should be informed and the issues resolved.
2. Researchers must ~~take special care to~~ design studies~~research~~ that are appropriate~~is fit~~ for the population in question~~being studied~~ and reflect the intended target group as accurately as possible. They must also be transparent about any limitations — such as potential gaps in data sources or population representation — ~~gaps~~ that may affect how well the research captures the defined target group. ~~exist in representing that population due to trade-offs in design decisions.~~
3. Researchers must provide clients with sufficient technical information, including method, sources~~source~~ of data, quality controls, analysis used and possible limitations about the research to enable them to assess the validity of the results and any insights and conclusions drawn.
4. Researchers must ensure that findings, results and any interpretation of them are clearly and adequately supported by data. They ~~and~~ must also make a clear distinction between the findings, the researchers’ interpretation of those findings, and any insights and conclusions drawn or recommendations made.
5. The client must be informed when AI or other emerging technologies are to be~~have been significantly~~ used in the datasets, analysis or interpretation of findings. This includes the use of synthetic data and synthetic personas/respondents. In such situations, the extent of human oversight must be stated.
6. Researchers must ensure that~~declared. Additionally,~~ any research data, or collateral materials, whether from surveys or client-related sources, remain confidential when submitted to~~significant differences between the analysis and interpretation produced by~~ AI or ~~other~~ emerging technologies. Access must be strictly limited to a secure, controlled environment.  ~~and those from human oversight should be clearly indicated.~~
7. Researchers must, on request, permit ~~allow~~ clients to arrange for independent checks on the quality of data collection and data preparation, subject to appropriate confidentiality agreements.

**Article 8 Transparency and confidentiality**

1. Researchers must identify any known, potential or suspected biases in the research that may have an impact on the collection, curation, processing, analysis or interpretation of the data and the findings.
2. Researchers must comply with any~~ensure there are no~~ intellectual property (IP) restrictions, such as copyright, or privacy issues associated with the re-use or application of the data.
3. Researchers must declare the use of ~~identify~~ subcontractors upon request~~providing it is feasible and does not create a competitive disadvantage or conflict of interest~~.
4. All parties must work in good faith to resolve ~~all~~ disputes whether they involve~~it be with~~ researchers, clients, subcontractors or data subjects.
5. Researchers must keep all communications with the client and all research results confidential~~secure~~, unless ~~otherwise~~ agreed with the client.

## Responsibilities to the General Public

# **Article 9~~8~~ Publishing Findings**

1. When publishing research findings, researchers and clients must ensure that the public has access to sufficient ~~basic~~ information, including data source, sampling, and methodology, to assess the ~~quality of the data used and the~~ validity of the conclusions. This must be in a form that is easily understood by the general public.

~~If advanced analytics, such as AI, have been employed in the research, researchers and clients must indicate this and if human oversight has been applied.~~

1. Researchers must, upon a reasonable request, make sufficient technical information and clear documentation available in a timely manner to validate ~~assess the validity of~~ any published findings.  ~~when a legitimate request is made, unless contractually prohibited.~~ Researchers and clients must disclose whether AI, synthetic data, or other emerging technologies played a significant role in sampling, deployment, analysis, or interpretation of the research, and to what extent human oversight was involved.
2. Researchers~~their organisation~~ must not disseminate – or allow their name, or that of their organisation, to be associated with the dissemination of – research and/or conclusions ~~from research~~ unless ~~those conclusions~~they are adequately supported by the data.
3. Researchers~~When the client plans to publish research findings, researchers~~ must ensure that they are consulted as to the form and content of any publication of the research findings by the client. Both the client and the researcher have a responsibility to ensure that published results are not misleading and that there is no undue selectivity of the findings.
4. When research ~~potentially~~ involves publishing the identity or personal data of data subjects, researchers must inform them~~the data subjects~~ in advance, specify which data will be published, and obtain their consent prior to any publication.
5. Researchers and clients must check~~ensure~~ that there are no ~~potential~~ privacy, or intellectual property (IP) infringements, such as copyright breaches, including those related to the application of AI and the training data in the published~~publishing of~~ research results and findings.

## Responsibilities to the Research Profession

# **Article 10~~9~~ Professional Responsibility**

1. Researchers must be honest, transparent, truthful and objective and ensure that their research is carried out, processed and analysed in accordance with appropriate scientific research principles, methods and techniques. ~~They must remain impartial as possible while recognising the inherent limitations of complete objectivity.~~
2. Researchers must always behave ethically and must not do anything that might unjustifiably damage the reputation of research or lead to a loss of public confidence in it.
3. Researchers must be straightforward and honest in all their professional and business dealings.
4. Researchers must not make false or otherwise misleading statements about their skills, experience or activities, or about those of their organisation.
5. Researchers must not unjustifiably criticise other researchers.
6. Researchers must conform to the generally accepted principles of fair competition.
7. Researchers must declare any potential conflict of interest associated with a research engagement to the client.

# **Article 11~~10~~ Legal Responsibility**

Researchers must conform to all applicable international and national laws, as well as~~and~~ local codes of conduct and professional standards or rules. Where the ICC/ESOMAR Code imposes a higher standard, that standard must also be met.

# **Article 12~~11~~ Compliance**

1. Researchers must ensure that research is carried out in accordance with this Code, that clients as well as other third parties to the research, including subcontractors, agree to comply with its requirements, and that the Code is applied, where appropriate, by all organisations, companies and ~~individuals~~people at all stages of the research.
2. Correction of a breach of this Code by a researcher, while desirable, does not excuse the breach.
3. Failure by an ESOMAR member to co-operate with a disciplinary investigation by ESOMAR into a possible breach of this Code, will be considered a breach of this Code. This also applies to members of other self-regulatory bodies implementing this Code and disciplinary investigations by their responsible bodies.

# **Article 13~~12~~ Implementation**

1. Once~~If~~ the Code~~,~~ and its underlying principles~~,~~ are adopted, they~~it~~ must be implemented at the~~, nationally and internationally by the appropriate~~ local, national and international levels by the appropriate self-regulatory bodies. Researchers and clients must also familiarise themselves with relevant local self-regulatory documents on research and with any decisions issued~~taken~~ by the appropriate self-regulatory body.
2. Requests for interpretation of the principles contained in this Code must be submitted to the ESOMAR Professional Standards Committee or the ICC Commission on Marketing and Advertising for interpretation.
1. Disintermediation represents removal of an intermediary in a research supply chain. [↑](#footnote-ref-2)
2. Applicable law, which must be observed, may define “child” differently. [↑](#footnote-ref-3)
3. ~~Example of direct identifiers are a name, specific geographic location, telephone number, picture, sound or video recording.~~ [↑](#footnote-ref-4)
4. Examples of direct identifiers are a name, specific geographic location, telephone number, picture, sound or video recording. Indirect identifiers are identifiers which combined can be used to identify the data subject. Examples of indirect identifiers include references to an individual’s physical, physiological, mental, economic, cultural or social characteristics. [↑](#footnote-ref-5)
5. Applicable law, which must be observed, may define “young person” differently. [↑](#footnote-ref-6)
6. ~~It is important that non-researchers also clearly distinguish research from commercial activities, attention is drawn to Article 7 of the ICC Advertising and Marketing Communications Code.~~ [↑](#footnote-ref-7)
7. As it is important that non-researchers also clearly distinguish research from commercial activities, attention is drawn to Article 7 of the ICC Advertising and Marketing Communications Code. ‘Marketing communications should be transparent about their true commercial purpose, and not misrepresent it. Hence, a communication promoting the sale of goods, or the contracting of a service should not be disguised, for example as news, editorial matter, market research, consumer surveys, consumer reviews, user-generated content, private blogs, private postings on social media or independent reviews etc.’ [↑](#footnote-ref-8)