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Moral bureaucracies and social network research

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ABSTRACT

In the wake of Europe's General Data Protection Regulation (GDPR), research ethics governance does not just affect the ethical dimensions of social research but also the range of scientific decisions available to researchers. Because of the sensitive status of personal data and the aversion to even minimal risk by what we call "moral bureaucracies", we are concerned that social network researchers will increasingly limit their research decisions to "safe" options, like reusing anonymized datasets, choosing target populations based on convenience rather than theoretical relevance, and routinely subcontracting fieldwork to professional data collection companies, among others. We also suggest that scientific associations and social scientists in general need to adopt a proactive role in preserving both scientific freedom and genuine ethics advice within this new regulatory framework.

Introduction

While social sciences and humanities have traditionally faced ethical dilemmas by relying on professionalism and deontological codes, since World War II, biomedical research has developed a set of principles (such as informed consent, right to opt out, right to anonymity, etc.; see World Medical Association, 2001) that have been adopted progressively by national regulators and research funding bodies. These regulations gave rise to Institutional Review Boards (IRBs, Department of Health, 2014), and Research Ethics Committees (RECs), that have broadened their scope during recent decades to the social sciences and humanities, spreading widely across countries, academic disciplines, and research institutions (Israel, 2015). IRBs and RECs are part of a system of research ethics governance which we refer to here as "Moral Bureaucracies" for (a) their monopoly on the legitimacy of ethics (taken away from researchers and/or professional bodies), (b) the normative creep that supersedes prior self-regulation, and (c) their aversion to even minimal risks. These moral bureaucracies —as we will see later— are two-faceted: on the one hand, committee members serving mostly on a voluntary basis provide valuable ethics advice; on the other, the bureaucratic nature of the system results in the growing dissociation between what we call "genuine ethics advice" (i.e. recommendations based on the balance between potential risks and scientific knowledge), and norm compliance primarily serving bureaucratic needs (Haggerty, 2004).

Concern with privacy in the digital age and the new data protection regulations in Europe in particular (General Data Protection Regulation, GDPR; The European Parliament, 2016) have given moral bureaucracies a whole new set of hazards to deal with involving personal data protection. Massive extraction, processing, and profiling of personal data from often unaware digital users has become a global trait, dubbed by Soshana Zuboff as the era of "Surveillance Capitalism" (2019). Scandals like those by Cambridge Analytica (Isaak and Hanna, 2018) and previous Facebook "experiments" (Zimmer, 2010), have raised public concern about how user data is protected. In this situation, the GDPR is intended to prevent the misuse of personal data by establishing a core of principles based on (i) lawfulness, fairness and transparency, (ii) purpose limitation, (iii) data minimization, (iv), accuracy, (v) storage limitation, (vi) integrity and confidentiality, and (vii) accountability (Chassang, 2017). These principles also apply to personal data collected for research purposes within the EU, and the transfer of personal data to or from "Third Countries" is strictly regulated.

The GDPR distinguishes between the "data controller" (universities and research centers in our case), and the "data processor" (typically the researcher, but also subcontracted organizations). The data controller appoints the "data protection officer" (DPO), responsible for setting up the organizational procedures for applying the GDRP, and especially the data protection impact assessments. RECs rely on this new authority for

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personal data management, and at least in the case of Spain, the DPO is a native member of the RECs dealing with biomedical data[1] .

The GDPR allows six lawful modes of personal data processing (Art. 6): when (a) the data subject has *given consent* to one or more specific purposes; (b) when processing is necessary for the performance of a *contract*; (c) to comply with a *legal obligation*; (d) in order to protect vital interests; (e) for *public interest*, and (f) for the purposes of the *legitimate interests* pursued by the controller. Therefore, universities and research centers pursuing public and legitimate interest (i.e. scientific research) may process personal data lawfully under the DPO supervision. Note that (e) and (f) modes of processing could supersede the (a) mode —given consent— lawfully. The GDPR also leaves room for the potential development of national exemptions for journalist, academic or artistic expression (Art. 85) —possibilities that have not yet been developed.

This context poses a challenge to the social sciences and the humanities, especially in Europe, but also in other countries. Social network research is especially exposed to this connection between ethics review and personal data protection because —except in socio-centric roster-style surveys— people who are named by respondents as network members did not give their consent and lack the right to opt out. In fact, "most IRB guidelines specify that "third parties" (people about whom research participants give data) should be considered research participants" (Borgatti & Molina, 2005, p. 343). In addition, complete anonymization may simply not be possible when network/-geographical data are involved, as sometimes individuals can be identified with a small number of personal attributes, time-space traces (Blondel et al., 2015) or by occupying given structural positions in a whole network (like having a high centrality score). Finally, prospective participants are now starkly aware of the potential risks of providing personal data or even eliciting alters from their social networks, which make traditional data collection methods harder to apply. This predicament is especially relevant when using respondent driven sampling, hard-to-count-populations or link-tracing methodologies (Bernard et al., 2010; Heckathorn, 1997; Thompson, 2012; Verdery et al., 2015). These methods are based on participants recruiting other participants among their own contacts, often receiving economic incentives, which poses additional ethical concerns (Scott, 2008).

In short, from the perspective of IRBs and RECs (especially in Europe), social network researchers have become a source of moral hazard (real or imagined) instead of being safe contributors to the public good, and this hazard is managed by moral bureaucracies enforcing measures intended to avoid any kind of liability. These measures impose practical limitations on the freedom to choose research problems, target populations, and sites of enquiry, and pose a burden especially on qualitative methods of enquiry (Van Den Hoonaard, 2011), which need both context and personal details to make interpretation possible. In addition, we suggest that moral bureaucracies may not be just an academic phenomenon, but that this growing attempt to regulate multiple spheres of human (and non-human) behavior is a pervasive trend of global society, the so-called "Risk society" (Beck, 1992) or "Audit society" (Power, 2000), and may be a reflection of anomie and societal distrust (Inglehart, 2018).

All of these circumstances (normative creep, dissociation between ethical reflection and normative compliance, etc.) have been highlighted by the academic literature during recent decades, but to our knowledge there is no comprehensive account of the objective factors that explain this situation, namely the characteristics of moral bureaucracies in a context of deregulation of labor, the institutional competition for access to research funding, and the system of individual assessment of academic merits, among others. We will address these factors in the next section. After that, we will discuss what we foresee to be the practical consequences of this new governance for social network researchers, including the preference for "anonymized" datasets, preference for subcontracting fieldwork by default (and subcontracting the ethics of data collection at the same time), and avoiding research in a long list of "third countries". Finally, we will suggest some measures that could be taken by scientific societies and bodies in order to protect what remains of the probably outdated scientific ethos (free, open, ethical, empirical, peer-reviewed, and systematic enquiry), in which we still believe. Research integrity issues (i.e. misconduct or questionable research practices) are beyond the scope of this paper.

Moral bureaucracies

Concept

In using the term "moral bureaucracies", we mean to emphasize the growing regulation of spheres of human and non-human decision-making based on moral values. "Values" are by definition *desirable final states of existence or behaviour* (Inglehart, 1977; Kilby, 1993; Kluckhohn, 1962; Rokeach, 1973), acquired by individuals during the socialization process, which can be applied in situations for which there is no established rule about how to proceed. In this sense, moral bureaucracies try to regulate potential outcomes as much as possible, assuming the capacity to interpret what is morally desirable. This bureaucratic form has at least four characteristics, some of which have already been mentioned.

The first characteristic is the *legitimation monopoly*, which exists regardless of the individuals who may compose the organization (and who may come from a variety of disciplines). The mere constitution of a "morality office" entails this monopoly, whether or not the organization is a government or other public administration. The acts of moral bureaucracies are authoritative and difficult to contravene. This monopoly confers real power to moral bureaucracies whose *ethics* approval is often *conditio sine qua non* for obtaining research funds or authorization to operate, with subsequent consequences for successful careers and the growth of scientific understanding.

The second characteristic is the natural *proliferation of norms*. Michel Crozier (2010 [1965]) describes the "bureaucratic phenomenon" as an organization structurally incapable of correcting its malfunctioning, which implies that dysfunctional rules are not discarded or updated (see also Selznick (1957:17) with regard to organizational structures becoming "infused with value beyond technical requirements of the task at hand"). In addition, impersonal rules have another function: they are used in practice as a defensive mechanism for obtaining autonomy from the chain of command (practical discretionality or freedom of action is hidden behind formal compliance). Therefore, bureaucratic organizations allow committee members to exercise power, and to develop new norms, without taking responsibility, which explains this inflationary process (Graeber, 2014). Kevin D. Haggerty (2004) refers to this trend in the ethics review industry as "mission creep", i.e., the colonization of new areas and the intensification of control "of practices deemed to fall within its official ambit" (p.394).

The third characteristic is the *aversion to even minimal risks*. Moral bureaucracies systematically avoid any kind of liability, always anticipating the worst of scenarios, whatever the cost for the research project. Needless to say, these scenarios are not based on empirical observations or probability calculus, but are "just in case" (Haggerty, 2004, p. 412). The way to avoid liabilities is to request additional measures in order to safeguard every possible aspect of the project. These measures can be reasonable or not, such as requesting administrative authorizations in non-democratic countries without first discussing with professional researchers what the best way to conduct safe and reliable research might be in these contexts, or requesting parental consent from people older than 16 years in an observational study, even though biomedical law

[1] "Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales". 16th additional provision.

may acknowledge this age as valid for consenting to serious surgery (personal observations). The Oxford Central University Research Ethics Committee (Feb 2017) puts it tellingly in one of its best practices documents[2] :

It is also important to appreciate that the ethical review process, as well as protecting the interests of participants, *is intended to avoid any potential reputational risk to the University* through public concern or objection that might arise in connection with a research project (p.3, italics added).

In addition, when moral bureaucracies approve something, the wording of the approval letter or communication is often conditional on higher authorizations (Van Den Hoonaard, 2011) or external assurances, such as approvals issued by other authorities. For instance, a moral bureaucracy may approve a project with serious implications for the privacy of people on the condition that another specialized committee issues a positive report on the matter (personal observation). The rationale behind this behavior is that it is the assessment of institutional risk, and not the assessment of informant risk or the potential scientific knowledge gained with the research project, that is at stake.

Finally, but importantly, the fourth characteristic is the *disconnect between respectable general goals and values, and the everyday practice* of these principles. This characteristic was pointed out by Michael Lipsky (2010 [1980]) in his book *Street Level Bureaucracy*. Lipsky describes the existence of two levels in public bureaucracies, the normative one, looking for legitimization in the realm of philosophy, moral values, and common good, and the practical one, where often well-meaning people struggle futilely against the bureaucratic maze, trying to do their best in order to provide a reasonable service to their clients. This disconnect is apparent in bioethics manuals (e.g. Hughes et al., 2010), which uncritically discuss the role of ethics committees in solving ethical dilemmas (often focused on outlier cases). The solution to these dilemmas involves a sophisticated reasoning based on different philosophical traditions, such as Consequentialism, Deontological rules, Virtue Ethics, and so on. It is interesting to observe that this normative, sophisticated, and value-oriented level contrasts with the almost total absence of these "ethical dilemmas" or "discussion about ethics" during the IRB or REC meetings (Parker et al., 2005). Instead, detailed discussions about formal procedures or potential liabilities (the "second level") take place systematically (Van Den Hoonaard, 2011: 162).

This disconnect between the two levels can be explained by the fact that risk avoidance and maximization of control are typical features of bureaucratic organizations (Pfeffer, 1992). In this context, applying philosophical reasoning or discussion about ethics dilemmas to the resolution of practical cases does involve taking into account the scientific value generated, and, consequently, the potential of assuming a risk greater than zero. Why should anybody assume even a minimal risk when it is possible to avoid it? Only when, and this is a point we will develop later, IRB/REC members are aware of the consequences of systematic risk avoidance on the scientific enquiry. Given this predicament, ethics advisers try to help researchers to navigate the growing corpus of regulations in order to achieve the ethics approval instead of engage themselves in truly ethical discussions.

The development of moral bureaucracies

Moral bureaucracies govern science in the name of ethics. They provide value and guidance but also affect the creation of scientific knowledge, especially in the case of social sciences, and in particular qualitative, ethnographic and social network research. The recurring question is: how we did get here? (Sleeboom-Faulkner et al., 2017).

There is extensive literature about the negative effects of both the bureaucratic phenomenon and the blind application of principles taken from the biomedical field to the social sciences (e.g., the concepts of "harm", tacit individualism, anonymity, see Unger et al., 2015; Bell, 2014; Hammersley, 2009; Van Den Hoonaard, 2013; Gunsalus et al., 2007; Hamilton, 2005). Nevertheless, this consensus has produced no action. Van den Hoonaard, for instance, asks why academics "did not protest when the regime was established" (2011:206).

A full explanation of this question is beyond the scope of the present work, but a few basic mechanisms can be pointed out: (1) the "horror stories" strategy for legitimizing the new regime, (2) the thriving sector of research ethics audits in a competitive research market, and (3) the existence of coping alternatives. We discuss each of these below.

a) The horror stories strategy

The history of biomedical research ethics starts with the Nuremberg Code as a reaction against Nazi experiments (Kottow, 2007) and the need to gain free informed consent from patients. The Declaration of Helsinki (1964–2000) and the Belmont Report (1979), among others, countersigned this principle, and it was then applied to social science, even though the risks in social science are not quite comparable. Without denying the existence of cases of malpractice, treating social research as equal to medical research contributes to the over-regulation of social science research, because:

Based on the ratio of studies conducted to abuses committed, social science may be one of the safest activities on earth: It is apparent that no social science- related atrocities near the magnitude of medical ones have ever occurred. Milgram's (1974) study involving deceiving participants into thinking they were applying electric shocks, and Humphreys' (1975) study, in which he failed to gain informed consent of participants in his study of impersonal public sexual behavior, and similar social science infractions, do not compete with the horrors of Tuskegee (1932–1973, during which treatment was withheld from syphilis victims), or Willowbrook (1956–1972, when children were injected with hepatitis), or the 1963 study in which elderly patients in New York City were injected with live cancer cells (Lemonick & Goldstein, 2002). (Hamilton, 2005, p. 194)

Today, even medical research adheres to remarkably good practices in general. The physician E. L. Pattullo (1982) noted that only 7 % of medical research subjects surveyed in 1974 experienced problems, most of them quite trivial: "Despite the handful of horror stories, the record of the professions in protecting their human subjects is remarkably good" (cited in Hamburger, 2004:338). What we want to stress here is that outlier cases are presented as "instances" of malpractice, instead of arbitrary selections in a context where a reasonable assessment of the general practice is not easy or possible because of the lack of data. Horror stories are self-justified and play a role in the process of legitimizing the new research ethics regime. In this regard, it is interesting to note that moral bureaucracies are not just the way society governs research ethics but probably the way it will govern "moral machines" such as artificial autonomous agents endowed with moral reasoning based on outlier cases (Awad et al., 2018).

a) The ethics audit sector

The so-called "Audit Explosion" or "Audit Society" (Power, 2000, 2003) describes a process that started at the end of the last century and that applied the supervision methods of the financial sector (i.e. "accountability" and "transparency") to practically all sectors and types of organizations in society, including universities and research centers, establishing a pervasive "audit culture" (Shore, 2008; Strathern, 2000), shared by scientists as well.

Although there is no systematic assessment available today of the ethics audit sector at the international level, we do know that the cost of operating IRBs and RECs in Canada, the United States, the United Kingdom, and Australia amounted to approximately $432 million dollars a year almost a decade ago (Van Den Hoonaard, 2011: 75), with

[2] https://researchsupport.admin.ox.ac.uk/sites/default/files/researchsupport/documents/media/bpg_04_competent_youths.pdf. Accessed 22 Sept, 2019.

more than fifty thousand people involved as IRB or REC committee members (estimate obtained by multiplying the number of IRBs in these countries by the average membership size reported by the aforementioned author). The very size of the audit sector suggests that it may be very difficult if not impossible to dislodge (Van Den Hoonaard and Hamilton, 2016).

Moreover, this sector, although modest compared with others, is expanding. In Europe, the European Commission (H2020 and ERC programs) recommends hiring external ethics advisors for their funded projects, implementing at the same time an elaborate system of ethics screening, evaluation and follow-up (European Commission, 2014). In the same vein, European programs that co-fund other public and private research programs impose the same ethics requirements, forcing these funders to hire the services of already established ethics auditors.

Ethics auditing is becoming a professional field on its own. It is important to bear in mind that staff working in moral bureaucracies benefit from the expansion of the regulatory system as a way of developing their professional careers. This is not a trivial issue as stable jobs are scarce at the global level (Inglehart, 2018). In this context, imposing new rules is objectively desirable: they reduce institutional risks and increase opportunities for professional development.

Many more examples of the growth of an ethics audit market could be given, but for the sake of simplicity, we will only mention the last piece of our rationale: the competitive scientific system. Today, researchers and research institutions compete for funds in order to survive. The extreme internal competition to obtain permanent positions or research grants in an increasingly competitive world, as well as the need to play the game of research indicators such as publishing in specific journals or getting as many citations as possible, create the fundamental need for the scientist to gain ethics approval despite the growing blizzard of paperwork. There is barely enough time to play the game, never mind try to amend it. This leads us to the next point.

a) Coping strategies

The mostly *ex-ante* nature of ethics review (except in cases where the budget allows for the existence of an ethics advisor) leads to a range of reactions. The first one is naturally, the most important and valuable: reflecting on the ethical dimension of one's research in order to make the necessary adjustments to improve participants' privacy, security, and dignity. This value is real, and necessary for scientific research. However, along with this basic and common reaction, researchers also have other, less salutary, responses to perceived unreasonable requirements. These include editing documents likely to be approved (but not necessarily the ones that will be implemented), introducing undesired changes to the methods, sites or populations, or simply quitting the intended research (Van Den Hoonaard, 2011, p. 226).

The existence of practical alternatives in order to gain ethics approval may help to explain why researchers agreed to the development of the new ethics regime. Why make a cause for the freedom of research, the right and the duty of producing sound knowledge about the world, when in most cases the intended research can still be conducted? This is a reasonable response, but the issue is that with the new regulations and the current means of supervision, it may no longer be possible to play the game.

Finally, it is worth mentioning that some authors have been especially critical of this governance system: Hammersley (2009) advocated against the legitimacy of ethics committees, and Hamburger (2007; Hamburger (2007; 2004) argued that the ethics regime violates the American Constitution's First Amendment. In this vein, the European Constitution states in Article 13 that "The arts and scientific research shall be free of constraint. Academic freedom shall be respected." From our experience, this right has been invoked by researchers only when their research projects have been denied, which rarely happens precisely because of the practical advice of ethics committee members who recommend ways of changing the original scientific design in order to avoid issues deemed problematic – especially those that may entail institutional liabilities.

Consequences of moral bureaucracies for social network research

Social network researchers —particularly those working with personal and egocentric networks— face a new era of institutional distrust aggravated, as we have already mentioned, by the practical difficulty of gaining consent from alters or giving alters the opportunity to opt out (removed reference) and of effective anonymization (Narayanan and Shmatikov, 2009; Zimmer, 2010). The main biomedical principles, namely *explicit consent* (Nuremberg Code), ability to *opt out* at any moment without consequences (Helsinki Declaration), and the right to *privacy* (GDPR, among many other regulations) are particularly cumbersome for social network research. In this vein, obtaining data from private companies (like Facebook, Telecom companies, and so on) will be increasingly difficult as a consequence of both legal limitations on the one hand, and the fact that this information constitutes the core of the firm's competitive advantage (Bastin and Tubaro, 2018) on the other.

In this context it is reasonable that network researchers will increasingly make "safe" decisions regarding their research proposals. We envisioned these coping strategies (not exclusive to social network analysts) as (1) reusing anonymized datasets, (2) preference for subcontracting fieldwork as a matter of course, (3) selecting convenient target populations, and (4) selecting convenient sites, among others.

Reusing anonymized datasets

The concept of Open Science (Nosek et al., 2015) promotes the sharing and reusing of both scientific texts and datasets. The advantages of such practices are undeniable: reproducibility, comparison, meta-analysis, controlling harking and p-hacking, and so on. Another convenient solution is to conduct anonymous web surveys, as fully anonymous data (along with organizations and deceased people) do not fall under the GDPR or, in general, under personal data protection laws. These web surveys can incorporate digital consent (by clicking the button "I Agree") without the need to negotiate a written or oral consent and to collect separate personal identifiers. Both the law and ethics committees currently accept digital consent. The digital culture in which we are embedded forces us to accept on a daily basis terms of service without having the time to read the long list of duties and rights that we are signing off on. Some authors have suggested the need to develop autonomous ethics agents who would be able to consent to the terms of digital services on our behalf (Etzioni and Etzioni, 2016; Jones et al., 2018).

Unfortunately, none of this solves the problem of how to share the qualitative information that accompanies egocentric (Perry, Pescosolido, & Borgatti, 2018) or personal network data (McCarty, Lubbers, Vacca, & Molina, 2019). The easy solution is to completely decontextualize the data, stripping it of its richness and accepting the consequent loss of scientific value (Mannheimer et al., 2018).

Kotsios et al. (2017, p. 19) describe their experience of trying to guarantee GPDR user rights in a study using Twitter data. After pondering several alternatives, they set up a Twitter account that automatically sent a tweet to monitored users containing a link to the research project information page, the types of data processing, and also information about their rights. After 45 tweets, the page registered one visit and the account was finally blocked by Twitter as spam. Actually, notifying 1 million users individually with the current API (which allows 2400 tweets per day) would have taken about one year and two months. This example is illustrative of the need to develop the scientific research exemptions foreseen in the GRPD, as we will see later.

Subcontracting fieldwork as a matter of course

Hand in hand with the rapid expansion of systems' auditing ethics has been the expansion of systems' auditing research expenses. The development of the audit system of publicly funded research invites researchers to outsource fieldwork in order to avoid the cumbersome processes of justifying a myriad of small reimbursements of money for fieldwork expenses, including transportation, accommodation, meals, data collection equipment and respondent incentives. Of course there is a well-established market of mostly survey research companies that combine marketing research with other types of social research (Bowman, 2015). However, researchers tend to have limited capability to negotiate the ethics protocols of such companies, despite the requirements of the ethics committees. In this sense, subcontracting fieldwork also involves subcontracting ethics. All over the world, the PIs are being held responsible for the subcontracting companies' application of the applicable personal data protection legislation, among other concerns. This is typically handled by obtaining signed agreements with the subcontractors that specify these issues. Nevertheless, from our experience, companies are reluctant to uncover their recruitment processes, to open their IT systems to external audit, and to modify their terms of service. In the US, IRBs may require subcontractors to obtain Federal-Wide Assurance certificates (FWAs), which in turn may require individuals in the subcontracting companies to be trained and tested on human subject protocols. In Europe, subcontractors have to comply with the GDPR in order to operate by developing a Privacy Impact Assessment (PIA), collecting explicit consent, and granting EU citizens the right to rectify, limit, or delete their personal data, among other requirements (www.qualtrics.com/uk/platform/gdpr/). As in the case of the US, the existence of an external certificate issued by an authority reduces the institutional liability over the research project, easing both the economic and ethical audits, and making the subcontracting option preferable to conducting fieldwork directly. Obviously, we have nothing against subcontracting fieldwork but we simply observe that in some occasions this decision will be made on the basis of non-scientific motivations.

Selecting convenient target populations

Another important consequence of this ethics regime is the additional paperwork and procedures that are required when working with vulnerable populations such as minors, undocumented migrants, patients, or people in poverty, or with illegal or a-legal practices such as street-vending and other elements of the informal economy. While professional researchers are trained to deal with both the ethical and practical dilemmas of this type of research in order to collect reliable information in an ethically responsible way, they have to demonstrate the security, integrity, and privacy of participants through an enormous amount of paperwork.

At the local level, it is likely that fieldwork in poor or "dangerous" neighborhoods will be systematically avoided despite the long tradition of Anthropology and Urban Sociology, among other disciplines, to establish trustful and reliable relationships with local entities and informants in these circumstances. In addition, small monetary compensations for participating in research on poor, "illegal" migrants, or refugees can be deemed problematic, if not forbidden, in addition to the difficulty of obtaining written consent from these groups. Fortunately, many ethics committees will accept oral consent in specific cases.

Increasingly, IRB/RECs ask researchers to provide "incidental findings" policies regarding data collection. In the biomedical tradition, "incidental findings" are unexpected information discovered about a patient that can have potential clinical significance (a mortal disease, for instance). In these cases the patients have the right not to be informed, except in extreme situations that may involve third parties (Andorno, 2004). In the social sciences, researchers are also being asked to provide these kinds of protocols, which may involve, for instance, telling gang members that researchers are under the obligation to report to the police any act deemed illegal committed by ego or her alters, which obviously makes the research impossible (personal observation). Again, we have nothing against incidental findings protocols provided they are applied for scientific reasons and not just to protect institutional liabilities.

These circumstances will probably lead researchers to choose less vulnerable populations (such as university students) or choose less problematic research questions, with the consequent loss of empirical validity and diversity in social research.

Selecting convenient sites

As we have already mentioned, collecting data in foreign countries can be problematic. At the international level we envision three possible scenarios: first, selecting countries based on purely strategic reasons calculated to avoid red flags in the ethics screening; second, working through partners in these countries; and third, avoiding countries where it is not possible to obtain ethics approvals from local committees without endangering the project. As it is easy to imagine, the list of "difficult" countries can be quite large, with unforeseen consequences for the development of scientific knowledge about our diverse world. In the case of the European Union, to date only 11 countries (including the Isle of Man, the Faroe Islands, Jersey, and Andorra) are deemed to have an adequate level of data protection[3] . Also, studies conducted in developing countries are increasingly asked to provide ethical approval from "local" ethics committees when available. What is undoubtedly good practice can become problematic if the country in question does not have stable democratic institutions or is subject to a process of radical political change.

These are some of the dilemmas we are currently able to envision. Let us now turn to the role of scientific societies in the era of moral bureaucracies.

The role of scientific societies

In our current situation, we suggest three lines of action. First, empirical research must be conducted on the effect of moral bureaucracies on social science in general, and social network research in particular. To our knowledge, there are just a few empirical studies about the effects of ethics committees on the protection of participants, the research methods used, and the value created by the research, and none of these studies have focused on social network research. Only when we have this type of data will it be possible to assess the real hazards that network research entails, and ultimately suggest an insurance system that relieves unjustified pressure on research projects.

Second, scientific associations in the social sciences should adopt a proactive role vis-a-vis legislators and institutions, like other professional associations. This stance requires a realistic acknowledgement of the situation, along with a consensus that probably will be difficult to reach. In this regard, it is worth mentioning the EASA's Statement on Data Governance in Ethnographic Projects[4] which acknowledged the application of Article 85, which as we have mentioned, allows for the development of specific exemptions of the GRPD requirements for scientific research. Only scientific societies are in a position to take the lead in the development of these exemptions for research, and this development is crucial for protecting our rights to conduct appropriate social science research. Organizations like universities, research centers, and IRB/RECs do not have the incentives to invest in such normative development (at least in the social sciences), and individual researchers

[3] See https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en#dataprotectionincountriesoutsidetheeu

[4] https://easaonline.org/downloads/support/EASA%20statement%20on%20data%20governance.pdf

competing for scarce resources do not have the time and resources needed for such work.

Third, scientific associations and bodies in the social sciences should promote specialized ethics committees along with the extant ones (e.g. American Sociological Association (ASA) and the British Sociological Association, BSA), within and outside universities and research institutions, as other fields have done (e.g., the Australian Computer Society, the Catalan Association of Artificial Intelligence (ACIA), among others). These committees could provide specialized guidelines that IRBs and RECs might regard as authoritative, or could even conduct ethics reviews of projects that might be deemed "hazardous" by research institutions. Should the researcher be able to obtain the clearance of these expert committees, the liability of their respective institutional ethics committee would be mitigated, making institutional clearance more likely. The rationale behind this recommendation is precisely that the bureaucratic nature of research ethics assessment diverts the focus from ethical dilemmas (human dignity, researcher accountability and risk avoidance versus the scientific knowledge generated) to norm compliance as a means of avoiding institutional risks. This shift in focus relegates the value generated by research —scientific knowledge and/or technology— to a secondary role unless at least some ethics committee members are close to the field of enquiry and therefore very aware of the scientific consequences of proceeding in such a way. In fact, this is what happens in the realm of biomedicine, where committee members should include "individuals with scientific and medical expertise", although not exclusively (World Health Organization 2009, 15).

Other measures could be implemented as well. Our point here is that other kinds of research ethics governance are possible, including ones that provide value to researchers while avoiding at the same time unintended negative effects.

Conclusions

Today, social network research is entering a new and adverse era in which the efforts of moral bureaucracies to deal with human subject issues will have significant consequences for the type of scientific knowledge generated. The powerful insight that social network research provides to the study of social structures is deemed suspicious by ethics committees as they consider that the three main principles of biomedical research are not fully met: consent (namely, of alters mentioned by study participants), the possibility of opting out (again, for alters), and anonymity. This situation has been aggravated recently by the growing regulation of personal data protection in the era of big data (including the appointment of new supervision agents, like DPOs), and the reluctance of participants to give away personal information (including ties to alters) as a response to the extractive orientation of digital platforms. We have suggested that in response to this situation social network researchers will be tempted to make a number of strategic decisions —e.g., reusing anonymized datasets, subcontracting fieldwork, and selecting convenient target populations and sites— which are less than optimal for generating new scientific knowledge. In addition, we have advocated for scientific societies to have a proactive role in order to counterbalance the natural bureaucratic dynamics: aversion to taking risks by inducing censorship and increasing the control of paperwork over researchers. We suggest that scientific societies should actively defend scientific freedom, both for quantitative and qualitative methods, and should promote specialized social science ethics committees that are able to assess real ethical dilemmas for building sound scientific knowledge.

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