REB Requirements for doing online surveys

When collecting data from participants with online tools, there are risks to anonymity, confidentiality, and privacy, which researchers must address in their REB proposals. Researchers planning to use online surveys should be familiar with the relevant policies of any survey companies used for data collection, especially if you are collecting personal information. Even if you are not collecting personal information, you should ensure the survey is completely anonymous and that that survey tool you are using has the capability to switch off the IP tracking feature.

Yukon University (YukonU) recommends the use of online survey tools whose servers are located in Canada. Researchers employed at YukonU should contact the Institutional Research Office (dmacdonald@yukonu.ca) to explore the option of using the institution's SurveyMonkey enterprise solution with servers in Canada.

The use of tools with servers in the USA is highly discouraged in Canada, as confidentiality is limited by the US Freedom Act. Protocols indicating the use of tools with servers in the USA must include the following statement in their Informed Consent Form(s): "*Please note that the online survey is hosted by [name of provider] which is a web survey company located in the USA. All responses to the survey will be stored and accessed in the USA. This company is subject to U.S. Laws, in particular, to the US Freedom Act that allows authorities to access the records of internet service providers. If you choose to participate in this survey you understand that your responses to the questions will be stored and accessed in the USA. The security and private policy for [name of provider] can be viewed at [URL].*"

Ensure that you have reviewed the Terms of Use and Terms of Service of the survey provider, demonstrate its details to the YukonU REB in your application, and inform your participants of such details in your Informed Consent Form/Script.

Overall, researchers use various types of software and cloud services to collect their data, and must communicate the relevant details of these systems to their participants during the consenting process. The larger questions revolve around understanding **the system you intend** to use so you can have a dialogue about the system and its details with potential or current participants of research, and be able to demonstrate your understanding to others such as the REB.

You must inform the REB about the:

- Web application / tools to be used for online surveys. Be clear and provide all details on how you will be conducting the survey.
    - Is the data stored directly on your local server, or will it be stored on the cloud and then transferred? (There is additional risk of a data breach with the latter). Best practice is to directly store the data to a secure password-protected server on the YukonU hosted site. Note that archived or backup copies may still be present in the cloud. Researchers should be familiar with the data retention/deletion policies of the online platforms they are using and should provide the details to the REB in their application.

- How will you protect personally identifiable information (PII) of participants, or information that when combined with other information could become personally identifiable? You must demonstrate to the REB that:
  - Any PII is stored on Canadian servers.
  - If the PII is not stored on Canadian servers, then the risks to participants of having their data stored outside of Canada (and potentially subject to access by foreign governments), must be clearly presented in the consent documents.
  - The risk of identification of otherwise anonymous participants through the combination of their responses is low, or if not low is adequately managed.
- IP addresses – researchers must indicate in their proposal and on the informed consent, whether IP addresses are recorded by the online survey tool or service. If so, how will confidentiality be assured?
- If recruiting online, researchers must specify:
  - Platforms to be used
  - Where the link to the study / survey will be placed online (forums, Facebook, etc.)
  - Recruitment notice / information