The purpose of this SOP is to clarify when and how researchers may use electronic sources while conducting human subjects research.

## I.     General Requirements

The internet is widely used to conduct human subjects research during the recruitment and consent processes, as well as in data collection.  Research using the internet must provide the same level of protection as any other type of research involving human participants.  However, it presents its own unique set of issues and concerns during the IRB review process.  Researchers may conduct research using electronic sources such as online survey software, social networking sites (Facebook, Twitter, etc.) or online marketplaces (Craigslist, eBay, etc.) provided they observe certain requirements as outlined below.

## II.     Scope

This SOP pertains to all human subjects research reviewed by the UNCW Institutional Review Board (IRB).

## III.     Applicable Definitions

A.     Anonymous

Of unknown authorship or origin; not named or identified; lacking individuality, distinction, or recognizability.

B.     Distress

Pain or suffering affecting the body, a bodily part, or the mind; a painful situation.

C.     Internet Protocol (or IP) Address

A unique identifier associated with every computer connected to the Internet. On many networks, the IP address of a computer is always the same, i.e., fixed or static. On other networks, a random IP address is assigned each time a computer connects to the network, i.e., dynamic. Knowing a fixed IP address is equivalent to knowing the identity of its users.

D.     Privacy Policy

A statement that declares a firm's or website's policy on collecting and releasing information about a visitor. It usually declares what specific information is collected and whether it is kept confidential or shared with or sold to other firms, researchers or sellers.

E.      Upset

To trouble mentally or emotionally.

## IV.      Procedures

A.      Anonymous Online Surveys
1. Anonymity
   a. When a researcher conducts an online survey, the researcher may not refer to the survey as "anonymous" if IP or email addresses are collected from subjects, as they are considered identifiers.
   b. To maintain anonymity of data, researchers should set survey software so that no IP or email addresses are retained.

2. Recruitment or Introductory Statements
   a. The IRB may require researchers to add the following statement if the online survey involves collection of sensitive or private information, such as financial information or information disclosing illegal activity, and subjects complete the surveys at locations of their choosing (rather than in UNCW-controlled computer labs), "The researchers will keep your responses secure once they are in the researchers' possession. However, the researcher(s) cannot guarantee security during transmission of data due to keylogging and other spyware technology that may exist on any computer used by the subject to respond to the survey/questionnaire."
   b. If a researcher must collect IP or email addresses in order to determine if a subject has completed the online survey, the researcher must inform the subject in the opening statement of the survey that these identifiers will be collected.
   c. Other requirements for recruitment/introductory statements may apply. Researchers should review ***UNCW IRB SOP 6.3 Anonymous Surveys/Questionnaires*** to view additional requirements.

B.      Collecting Data from Social Media Sites
When a researcher plans to observe comments posted on blogs or other social media websites, the researcher must:
1. Do so in accordance with the site's privacy policy, and;
2. Identify him/herself as a person conducting research who will be gathering information from the site for a specified period of time, or;
3. If, due to the nature of the study, it is not possible for the researcher to identify him/herself, this must be justified on the IRB application along with a description of appropriate opt-out and debriefing procedures.

C. Privacy Policy of Website
1. The UNCW IRB will consider websites with no privacy policy to be public sites. Using data from public sites is akin to observing public behavior which does not meet the definition of research using human subjects.
2. When a website has a privacy policy, the IRB will assume that the users of the site have a presumption of privacy. Using data from sites that have privacy policies meets the definition of research using human subjects.
3. When a website has a privacy policy, the researcher must attach a recent copy of the site's privacy policy (printed within thirty days of protocol submission) to their IRB application.
4. When a researcher plans to collect data from a website that has a privacy policy, the research design must conform to all requirements of the site's privacy policy.
5. If the researcher is unable to find a copy of the site's privacy policy, the researcher must contact the site to determine if a policy is available.
6. If after contacting the site the researcher learns a privacy policy is not available, the researcher must state this on the IRB application.

D. Email Recruitment
1. Researchers wishing to recruit UNCW faculty, staff and/or students to participate in human subjects research by email must submit a proposed email recruitment message to the IRB for approval.
2. Researchers may be required to obtain approval from other UNCW offices to access email addresses or distribution lists, such as the Registrar's Office, the Office of University Relations, or the Office of Institutional Research and Planning.
3. Researchers wishing to email all faculty and staff or all students are subject to the UNCW Mass Emails policy 07.200.14.
4. IRB staff will guide researchers on proper procedures as needed.

## V. References to Other Applicable SOPs

| SOP Title | SOP # |
|---|---|
| Anonymous Surveys/Questionnaires | 6.3 |

## VI. Responsibilities

| Title | Responsibility |
|---|---|
| IRB Co-chair | Responsible for reviewing applications to conduct human subjects research that qualify for expedited review. |
| IRB Staff | Responsible for conducting initial reviews of applications to conduct human subjects research, assisting PIs with including relevant information in |

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| | applications and attachments, and for directing applications appropriately for determinations of exemption or approval. |
| Research Compliance Manager | Responsible for reviewing applications for determinations of exemption. |
| Principal Investigator (PI) | Responsible for submitting applications to conduct human subjects research to the IRB prior to initiating activities, representing proposed activities accurately, and conducting research in accordance with methods and procedures identified in the approved application. |

## VII. Resources

A. UNCW IRB Website: http://uncw.edu/sparc/integrity/irb.html

B. UNCW Mass Emails Policy 07.200.14: http://uncw.edu/policies/documents/0720014MassEmail2014.pdf

C. U.S. Department of Health & Human Services, Office of Human Research Protections website: https://www.hhs.gov/ohrp/

D. 45 CFR 46 ("Common Rule"): https://www.ecfr.gov/cgi-bin/text-idx?SID=75addf8360492a28075e3a218631fcdc&pitd=20180719&node=pt45.1.46&rgn=div5

E. Belmont Report: https://www.hhs.gov/ohrp/regulations-and-policy/belmont-report/index.html