

UBC Office of Research Ethics

Using Online Surveys

Researchers planning to use online survey companies should acquaint themselves with the relevant laws. In particular, section 30.1 of the BC **Freedom of Information and Protection of Privacy Act (FIPPA)** states:

A public body must ensure that personal information in its custody or under its control is stored only in Canada and accessed only in Canada, unless one of the following applies:

- (a) *if the individual the information is about has identified the information and has consented, in the prescribed manner, to it being stored in or accessed from, as applicable, another jurisdiction;*
- (b) if it is stored in or accessed from another jurisdiction for the purpose of disclosure allowed under this Act.
- (c) If it was disclosed under section 33.1 (1) (i.1).

Under FIPPA, “personal information” is defined as “recorded information about an identifiable individual.” This includes directly identifying information (e.g. SIN number, student number, etc.) as well as indirectly identifying information (e.g. postal code, date of birth) that alone or in combination with other information might reasonably be expected to identify an individual.

Please be aware that an IP address constitutes indirectly identifying information. Collecting someone’s personal opinions about something is only considered “personal information” if the information is linked or could possibly be linked to the individual. Personal opinions alone do not constitute “personal information” for the purposes of BC FIPPA. For further information please consult the Office of the University Counsel [Privacy Fact Sheet: What is Personal Information?](#)

If you are not collecting any personal information in your survey, then you are free to use whatever online survey tool you prefer as long as the survey is completely anonymous – i.e. the online survey tool you are using has the capability to switch off the IP tracking feature (online survey tools collect this information from users as a matter of course).

If you are collecting personal information from respondents, then survey tools hosted and serviced in Canada should be used. UBC strongly recommends that you use the UBC-hosted version of Qualtrics, which is fully compliant with the BC Freedom of Information and Protection of Privacy Act (FIPPA) because the survey data is kept secure and is stored and backed up in Canada. For more information, please go to <https://it.ubc.ca/services/teaching-learning-tools/survey-tool>. The survey tool is available to all UBC faculty, staff, students, and sponsored guests with a valid CWL account.

However, under the FIPPA and UBC guidelines, it is also acceptable to use online survey tools located outside Canada (e.g. the United States, Europe) as long as respondents have consented to having their information stored in a jurisdiction outside Canada (note: “click-through” consents are acceptable). If the server is located in the USA, then the respondent must be made aware of the fact that the data is potentially subject to the Patriot Act. In such instances, the consent information must clearly indicate the location of the survey company’s server and include a description of any associated limits to confidentiality. See the following for an example

of a typical statement which can be edited to meet the needs of your survey:

This online survey company is hosted by a web survey company located in the USA and as such is subject to U.S. laws, in particular, the US Patriot Act which allows authorities access to the records of internet service providers. If you choose to participate in the survey, you understand that your responses to the survey questions will be stored and accessed in the USA. The security and privacy policy for the web survey company can be found at the following link: _____.

Please be aware that if you are conducting a survey on a highly sensitive topic (especially a politically sensitive one), the REB may deem the use of a US-based survey tool inappropriate.

If you have any questions regarding FIPPA legislation and online surveys please consult the Legal Counsel, Access and Privacy at the Office of the University Counsel access.and.privacy@ubc.ca).

PARTICIPANT CONSENT FOR ONLINE SURVEYS

If the study is limited to an online survey, a cover letter may be used instead of a full signed consent form, provided that it includes the information needed by the participant to make an informed decision about participating in the survey study. If you are using a cover letter instead of a full consent form, ensure to include the following or similar wording in the letter: “By completing the questionnaire, you are consenting to participate in this research.” For most basic survey studies, the cover letter needs to include: the study title, contact information of the PI, a short description of the study, risks and benefits, limits to confidentiality, a statement that participation is optional, and the UBC Research Participant Complaint Line text. Where possible, the cover letter should also include UBC letterhead. If you are unable to include any of these elements in the cover letter because of the study design, ensure that this is clearly described and justified in your application, e.g. in box 6.6. Obtaining Consent.

For quick reference, the UBC Research Participant Complaint Line text is as follows:

If you have any concerns or complaints about your rights as a research participant and/or your experiences while participating in this study, contact the Research Participant Complaint Line in the UBC Office of Research Ethics at 604-822-8598 or if long distance e-mail RSIL@ors.ubc.ca or call toll free 1-877-822-8598.

OTHER SAMPLE ONLINE SURVEY TOOLS

Canadian-hosted

Hosted in Canada Surveys (uses LimeSurvey) – www.hostedincanadasurveys.ca
SimpleSurvey – www.simplesurvey.com

US-hosted

SurveyMonkey – www.surveymonkey.com
SoGo Survey – www.sogosurvey.com
SurveyGizmo – www.surveygizmo.com

European-hosted

LimeSurvey – www.limesurvey.org