



<b>Guideline Title</b>	<b>Conducting Surveys</b>
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<b>Approving Body</b>	Provincial RITHIM Committee
<b>Responsible Officer</b>	Director, RITHIM

## 1 INTRODUCTION

This document outlines guidelines in regards to privacy considerations while conducting surveys, based on information provided by the University of Manitoba's current procedures as of November 21, 2019. Surveys conducted in the process of health research on aware participants are essential to the creation of meaningful data and analysis, and have the potential of personal health data information being shared with the investigator.

## 2 CONFIDENTIALITY

A survey may be classified as either Confidential or Anonymous. If a survey is classified as Confidential, a Privacy Notification Statement will be required by the Primary Investigator. The below information will help an investigator determine the status of a survey and aid in the process of decision of whether a privacy statement is required in their research. The reviewing officers at CHIPER may classify the survey differently than the investigator has and can request a statement be provided if it has not in the initial application.

### 2.1 Confidential Surveys

2.1.1 A survey can be classified as Confidential if:

- The survey includes open text-based answer fields;
- The survey includes demographic questions that could identify the participant;
- The survey collects IP information or email addresses of the participant; and/or
- Contact information about the participants is collected.

2.1.2 If a survey is believed to be Confidential, a privacy notification statement will be required. There are two main types of notification statements, either or both of which may be required. These are the Personal Health Information Act (PHIA) and Freedom of Information and Protection of Privacy Act (FIPPA).

2.1.3 If the survey involves or is being conducted by a third-party such as a market research firm, the survey disclosure is required to indicate that this information will be made available to the third-party.



- 2.1.4 A survey will require a PHIA statement if personal health information such as Personal Health Identification Number (PHIN) or other identifying symbol of the participant is collected.
- 2.1.5 A FIPPA statement will be required if non-identifying personal information is collected about the participant, including, but not limited to, the participant's:
- Age;
  - Marital status;
  - Culture;
  - Blood type;
  - Genetics;
  - Education;
  - Employment;
  - Prejudices;
  - Legal history; and/or
  - Finances.

## 2.2 PHIA Statement

A PHIA statement if required is required to be placed on the surveys before the participant's signature line and after the Primary Investigator's contact information. The institution of the primary investigator will provide the required statements that are unique to each institution, and often are a combination of standardized information and customized text for each research project.

## 2.3 FIPPA Statement

A FIPPA statement if required is required to be placed on the surveys before the participant's signature line and after the Primary Investigator's contact information. The institution of the primary investigator will provide the required statements that are unique to each institution.

## 2.4 Anonymous Surveys

- 2.4.1 A survey can be classified as anonymous if:
- The survey does not include open text-based answer fields;
  - The survey does not contain questions about demographics that could identify the participant;
  - The survey collects no electronic personal data about the participant (IP addresses or email addresses for example); and
  - No future identifiable contact information is collected in the survey.