

## Purpose

To clarify how online spaces—especially social media groups—should be classified for IRB purposes and to ensure appropriate ethical standards when recruiting participants through social networking sites (SNS). This document will also provide requirements and sample language for IRB submission.

## Why This Matters

The use of SNS (e.g., Facebook, Reddit, LinkedIn) in recruitment has surged—but **not all digital spaces are created equal**. Whether a group is "public" or "private" affects:

- The expectation of privacy for users,
- Whether permission is required to recruit from that space, and
- Whether IRB oversight (or even informed consent) is required.

## Definitions

### *Community Guidelines or Norms*

On social media platforms, there are sets of rules and expectations that define acceptable behavior and content for users. These guidelines aim to foster a safe, positive, and respectful environment for all community members. They outline what is prohibited, such as hate speech, harassment, and spam, and detail the consequences of violating these rules, which can range from warnings to account suspension or deletion.

### *Public Group/Page/Account*

Content is accessible to anyone, without login or group membership. The user has no reasonable expectation of privacy. Public groups are visible to anyone online, no login or membership required. Recruitment still requires IRB submission and approval, even in public spaces, especially when identifiable or sensitive information is collected

### *Semi-Public (Restricted Access) Spaces*

Spaces that require login to a platform (e.g., Facebook, Reddit, LinkedIn), but do not require admin approval or vetting to view or interact with posts. While not visible to the open web (i.e., via Google), these spaces are broadly accessible to most logged-in users and generally do not convey a strong expectation of privacy. This category applies to the vast majority of 'public' spaces. Examples include:

1. Facebook pages that can be followed without moderator approval but requiring login to post
2. Reddit threads visible to all users but requiring login to post
3. Publicly listed LinkedIn groups that require joining but no moderator approval

*IRB Consideration:* Facebook doesn't acknowledge a middle ground between 'public' and 'private', but from a research ethics perspective, that middle ground clearly exists, based on:

- How easy it is to join (open join vs. admin approval)
- Whether content is visible after login even without being a member
- Whether group norms convey an expectation of privacy, regardless of settings

Recruitment may be permitted without group admin approval, but researchers should still review community norms and post transparently. If the topic is sensitive or involves potential identifiability, err on the side of treating the space as private.

Note: Logging in to a platform (e.g., Facebook, Reddit) allows general access but does not confer group-level membership. Researchers must distinguish between simply accessing a platform and being granted entry into a moderated or member-restricted group.

### *Private (closed) Group/Page/Account*

Access to content requires:

- Logging into the platform,
- Group membership approval (e.g., moderator/admin),
- Or attesting to specific characteristics (e.g., being LGBTQ+, living with cancer, etc.).
- Merely requiring a simple gate question or screening (e.g., ‘are you a teacher?’) does not automatically render a group private. However, if membership is conditional on attesting to specific traits, experiences, or identities, especially those of a personal or sensitive nature, then the group should be treated as private for IRB purposes.
  - If membership is granted based on answering a simple affiliation question (e.g., ‘Are you a teacher?’) but no verification or vetting occurs, treat with caution. Consider the sensitivity of the community’s content and norms to determine whether participants may expect privacy.

### *Platform-Specific Classifications*

#### *Facebook*

- **Public Group:** Anyone on and off Facebook can see the group's name, what people post, comment and share in the group.
- **Semi-Public (restricted) Group:** Although Facebook classifies groups only as “Public” or “Private,” many “public” groups require a user to be logged into Facebook to view content. While technically public by label, these groups create practical access barriers that may place them in a restricted or limited access category for IRB purposes. Researchers should assess not just technical settings but also group norms and content sensitivity.
- **Private Group:** Only members can see the group's name, members, and posts.

#### *Instagram*

- **Public Account:** All users can view posts, stories, and profile information.
- **Private Account:** Only approved followers can view posts and stories.

#### *X (formerly Twitter)*

- **Public Account:** Tweets are visible to everyone, including non-followers.
- **Protected Account:** Only approved followers can view tweets.

#### *LinkedIn*

- **Public Group:** Anyone can view group content and member lists.
- **Private Listed Group:** Group is visible in search results; only members can view content.
- **Private Unlisted Group:** Group is hidden from search; only accessible via direct link or invitation.

### Reddit

- **Public Subreddit:** Anyone can view and participate.
- **Restricted Subreddit:** Anyone can view content; only approved users can post.
- **Private Subreddit:** Only approved users can view and participate.

## Expectation of Privacy

If an individual *reasonably expects their content won't be public*, even if it's technically visible to others (e.g., in a closed group), IRBs treat this as private information.

## Three-Tiered Framework

Category	Criteria	Example	IRB Consideration
<b>1. Fully Public</b>	No login* or group membership needed	Public Twitter posts, public Facebook pages	OK for passive observation; no permission needed.
<b>2. Semi-Public (restricted access)</b>	Login required to view or post, but no group membership or admin approval needed.	Facebook posts visible to logged-in users. <b>Examples:</b> <i>Spaces where content is viewable after login but do not require explicit group membership, such as some Reddit threads, Facebook events, or public forums behind login screens, fall into a limited or restricted access category.</i>	Researchers should consider both platform access rules and user expectations when classifying these spaces.
<b>3. Private/closed</b>	Login + group membership or qualifying criteria	Private Facebook groups, subreddits requiring approval	Treat as private space; <b>must</b> get admin/moderator approval for research recruitment

\*Login = platform-level access (e.g., logged into Facebook, Reddit, etc.), not group-specific approval. These spaces exist in a gray zone; researchers must assess whether users perceive the space as private despite technical access, especially if dealing with sensitive topics or vulnerable groups.

## Ethical Considerations for Internet-Based Recruitment

The use of social networking sites (SNS) and other online platforms for research recruitment introduces unique ethical complexities. Even when online spaces appear publicly accessible, investigators and IRBs have a shared responsibility to protect participant autonomy, privacy, and well-being.

### 1. Expectation of Privacy vs. Technical Access

Participants may reasonably believe that their disclosures within certain online communities, especially around sensitive identities or experiences, are private, even if the platform is publicly viewable.

**IRB Reminder:**

Do not rely solely on group settings to determine privacy. Assess the *intended audience, group norms, and sensitivity of information* shared. If participants post in a context that implies confidentiality (e.g., an LGBTQ+ support group), treat the space as private, even if it's technically open.

**2. Public ≠ Automatically Exempt**

Even in "public" forums, IRB oversight may still be required.

*Example:*

Observing or collecting responses about gender identity, trauma, or health status from a public blog or group may still trigger Exempt Category 2(iii) or require full review if identifiable information is recorded and disclosure could result in harm.

**3. Identifiability is Contextual**

Partial identifiers, like age, location, group affiliation, or institutional ties—can combine to make a subject readily identifiable, even if names are removed.

*IRB Tip:*

Always assess **re-identification risk** in combination. Avoid including unaltered quotes, usernames, or screen captures unless explicitly consented to and justified.

**4. No Lurking or Covert Recruitment**

Passive observation or recruitment from online communities without disclosure (e.g., "lurking" in a private group) is considered ethically inappropriate, even if technically feasible.

*IRB Standard:*

Recruitment must be transparent. PIs should identify themselves and their study when engaging with online communities and obtain permission from group admins before posting.

**5. Consent Must Still Be Meaningful**

Even when consent is waived or provided via checkbox, participants must receive *clear, understandable information* about:

- Who is conducting the research,
- What data will be collected and how it will be used,
- Potential risks and limitations to confidentiality (especially online),
- Whether and how recordings will be used or stored.

For studies collecting sensitive data, consider a brief comprehension check or summary restatement to ensure informed participation.

## Recruitment Best Practices

### 1. Verify group privacy settings before posting

- Screenshots alone aren't sufficient; check the actual group description and rules.
- If it says "private," it **is** private, even if the PI is already a member.
  - Being a group member does not automatically grant ethical permission to recruit. While casual posts (e.g., selling a bike) are often welcome, research recruitment may raise concerns about participant vulnerability, data use, or community disruption. Always request permission for posts that solicit participants, even in spaces you can otherwise post freely.

### 2. Get explicit permission when required

- If posting in a private or restricted group, **written permission from the group admin/moderator** is required and should be submitted with the IRB application.
  - If you are a group member and can post without admin oversight, that may lower administrative hurdles, but it does not remove ethical obligations. If your post asks people to join a research study, it must be clearly identified as research and still requires permission from the group moderator unless the group has an explicit policy allowing such posts.

### 3. Document everything

- As part of your IRB submission, include:
  - Screenshot of group settings,
  - Copy of admin or moderator permission (email or message),
  - Recruitment post text.

### 4. Include privacy classification in your application

- Clearly indicate whether each recruitment group is public, semi-public (restricted access) or private,
- Describe how privacy risks are minimized,
- Include a statement on how participant confidentiality will be protected if recruitment occurs in sensitive spaces.

### 5. Terms of Service compliance

- Always consult the platform's terms of use.
  - For example, Twitter allows researchers to use tweets publicly, while other platforms may restrict external use or scraping of content.

### 6. Snowball sampling considerations

- Researchers are responsible for their initial use of online communities, not for how participants organically share posts. However, PIs should avoid encouraging participants to re-share recruitment posts in private or closed groups without first confirming that those groups permit research-related content
- Do not encourage 'viral' or snowball sharing into groups where you don't have posting permission. If others share your post organically, document it if relevant, but don't treat that as a backdoor to recruitment.

## Confidentiality Tip

Even in public spaces, avoid collecting identifiable usernames, avatars, or images unless it's necessary and approved by the IRB. And always de-identify quotes where re-identification could occur.

## Sample IRB Language (for proposal document or IRB application)

### For Public Groups:

*“Participants will be recruited from social media groups classified as public. These groups do not require login credentials or membership approval to view content or posts. The PI has verified that group settings allow open posting and public visibility. As such, no additional permissions are required to post recruitment materials.”*

### For Semi-Public (Restricted Access) Groups:

*“Participants will be recruited from social media groups classified as semi-public. These groups may require users to log in to the platform and/or request to join, but do not involve administrator vetting or restrict access based on identity or group membership. The PI has reviewed the platform and group settings and determined that while the space is not indexed by search engines, its content is broadly visible to most platform users. Where possible, the PI will respect community norms and notify group administrators before posting recruitment materials, but written permission is not required for recruitment in these spaces. All recruitment will be clearly identified as research related.”*

### For Private (Closed) Groups:

*“Participants will be recruited from social media groups classified as private. These groups require membership approval and are not accessible to the general public. The PI has obtained written permission from the group administrator(s) to post recruitment materials and will retain documentation of this approval in the study file. Recruitment posts will be limited to those explicitly authorized by group moderators.”*

## Additional Considerations

- Avoid assuming user consent just because a group appears open: Just because a group or platform allows public viewing or posting does not mean that its users have consented to be part of a research study, or to be contacted for recruitment. Researchers must distinguish between content accessibility and ethical permission, especially when the group involves vulnerable populations or sensitive topics.
- Always err on the side of caution when the privacy setting or user expectations are ambiguous.
- If in doubt, contact the IRB for a case-specific determination.

## Responsibilities

### *PI*

- Accurately classify recruitment platforms (e.g., distinguish between public, semi-public (restricted access), and private groups).
- Secure permission from group administrators when posting in private or closed spaces.
- Document access rights or permissions clearly in the IRB application.
- Ensure recruitment respects the privacy expectations of group members and complies with site terms of use.

## IRB

- Evaluate whether the proposed recruitment plan aligns with ethical standards and respects participant privacy.
- Verify internal consistency in the submission (e.g., claiming a group is public, but show it's private).
- Request clarification or corrections when discrepancies are noticed—but not proactively investigate or fact-check each claim unless something flags it as inconsistent.

## Resources

- **45 CFR 46 – The Common Rule**  
U.S. Department of Health and Human Services regulations for the protection of human research subjects.  
<https://www.hhs.gov/ohrp/regulations-and-policy/regulations/45-cfr-46/>
- **SACHRP (2013).**  
[\*Considerations and Recommendations Concerning Internet Research and Human Subjects Research Regulations\*](#)  
Final report by the Secretary's Advisory Committee on Human Research Protections (SACHRP).
- **Advarra IRB.**  
[\*Differentiating "Public" and "Private" Internet Spaces in IRB Review\*](#)  
Practical guidance on privacy expectations and recruitment ethics in digital environments.
- **College of Charleston IRB.**  
[\*Guidance on Research Using Social Networking Sites\*](#)  
Clarifies researcher responsibilities and platform-specific expectations.
- **Facebook Group Privacy Settings**  
<https://www.facebook.com/help/220336891328465>
- **Instagram Privacy and Visibility**  
<https://help.instagram.com/517073653436611>
- **X (formerly Twitter) Protected Tweets**  
<https://help.x.com/en/safety-and-security/how-to-make-x-private-and-public>
- **LinkedIn Group Privacy Descriptions**  
<https://www.linkedin.com/help/linkedin/answer/a548061>
- **Reddit Community Types**  
<https://support.reddithelp.com/hc/en-us/articles/360060416112>